

Submission in respect of the Dublin City Council (DCC) Development Plan 2022-2028

Community Health Organisation Dublin North City & County (CHO DNCC) provides community based health and social services to a population of **675,462** (census, 2022*) which incorporates all of Fingal and the north part of Dublin City. These services include primary care services, social inclusion services, health and well-being services and services for people with disabilities, older persons and people who require mental health supports. These services are delivered through the HSE and its funded agencies to people in local communities, as close as possible to their homes.

CHO DNCC have reviewed the Dublin City Development Plan 2022-2028 and welcome the targeted developments under a range of sectors that will collectively contribute to a better quality of life for the people of Dublin. These developments influence the wider determinants of health including, air quality, water quality, regeneration of villages and towns, employment, housing, transport, cycling and walking, local sport and physical activity participation, social inclusion, community development and sustainable energy solutions. CHO DNCC welcome continued engagement with Dublin City Council in relation to implementation of the Healthy Ireland and Sláintecare Plan to ultimately reduce health inequalities and enhance quality of life for the people of Dublin City. On reviewing the Development Plan, CHO DNCC would like to highlight some key recommendations for consideration when implementing this plan over the next six years.

Key Recommendations

CHO DNCC have utilised the chapters outlined in the Dublin City Development Plan to structure our submission. Throughout the remainder of this document we have numbered key recommendations we wish to highlight specifically under chapters 5, 6, 7, 8, 10, 12 & 15. For the most part, the key recommendations fall under the following themes;

- The need to support healthy placemaking by creating outdoor environments that prohibit and further de-normalise smoking particularly (e.g. outdoor dining areas, active travel routes, in parks and open spaces). This will reduce exposure to second hand smoke and limit tobacco litter and its impact on the environment.
- The need to support healthy placemaking by creating environments that make healthy eating the easiest choice, through limitation of access to high fat high sugar food outlets, prohibiting these food outlets nearby schools (as outlined in Chapter 15) and the promotion of healthy food options across Dublin City.
- The need to support healthy placemaking by creating a city that is supportive of young parents by creating breastfeeding friendly environments and access to affordable childcare.
- The need to ensure transport, housing and the general community are accessible for/ and meet the needs of older people and people with disabilities.
- The need to establish easy connectivity and movement to and from healthcare facilities including active travel opportunities ensuring accessibility for all and making these facilities an attractive place to work – in partnership with the HSE.
- The creation of Health Promoting Employers supported by HSE Health & Wellbeing.
- The need to upgrade existing provisions for Traveller sites.
- The need for CHO DNCC HSE representation on Dublin City Council steering committees/working groups, where relevant.
- The need to monitor population growth and subsequent demand for health services at Community Health Network level, this planning will support Health Needs Analysis for Community Health Networks.

Chapter 3: Climate action

CHO DNCC recognises the importance of education on climate awareness to all sectors. We support the commitment of DCC to providing education and training in relation to climate change through the WHO Breathe Life Campaign with the local Comhairle na nÓg and the MODOS training programme for small and medium sized businesses, the ongoing SEAI's Sustainable Energy Communities Initiative and continuing to prioritise climate mitigation and adaptation measures including green infrastructure. This demonstrates the commitment of DCC to ensure that Dublin is a city with clean air and clean water for future generations. These are the conditions that influence health outcomes and quality of life. CHO DNCC would like to highlight:

- The importance of providing sanitation systems, upgrades to sewage systems and water supply for traveller halting sites across Dublin City Council to support health needs of the Traveller Community.

CHO DNCC supports DCCs commitment to climate action and will promote climate mitigation and adaptation measures including sustainable transport (i.e. active travel) aligning to the 15 minute city concept, locally sourced food (through community gardens and allotments) and use of sustainable materials. CHO DNCC encourage:

- A collaborative approach between Local Authorities to extend the active travel network across the City and wider Dublin County.

Chapter 4: Shape and structure of the city

HSE Health & Wellbeing CHO DNCC have been working in partnership with local community organisations & DCC in North East Inner City, Cabra, Finglas, Darndale and Ballymun in implementation of the Sláintecare Healthy Communities initiative. The aim of Sláintecare Healthy Communities is to improve the long term health and wellbeing of people living within these communities aligned to SICAP areas. We support the consolidation of the city through investment to improve cycling/ pedestrian and green infrastructure and acknowledge that this contributes significantly to good health and improved quality of life. We will continue to work in partnership with DCC and the Local Development Officers in the provision of community supports for local people to support their health which will be enhanced by the improvements in infrastructure.

Chapter 5: Quality housing and sustainable neighbourhoods

CHO DNCC fully welcome the targeted developments in relation to quality housing and sustainable neighbourhoods and the "Health in All Policies" approach that is evident in this section through the consideration and inclusion of the Healthy Ireland Framework 2019- 2025 and the Sláintecare Plan.

CHO DNCC ratify the commitment to provision of housing for older people, people with disabilities and traveller accommodations and provisions for people who are homeless and emphasise the importance of these provisions for the aforementioned populations. CHO DNCC welcome the integration of healthcare facilities in accessible locations and the commitment to supporting the Health Service Executive and other statutory, voluntary and private agencies in the provision of appropriate healthcare, as well as the focus on healthy

placemaking, social inclusivity, improved social infrastructure and commitment to providing high quality living environments. CHO DNCC propose the following further recommendations for inclusion in the development plan:

- The creation of a Breastfeeding Friendly Dublin City, strategically promoting breastfeeding friendly spaces and business and designing public environments to promote breastfeeding.
- A collaborative approach to ensure availability of accommodation for Healthcare workers to support sustainable recruitment in the sector.
- Provision of sanitation units, upgrades to sewage systems and water supply on halting sites as outlined in the Dublin City Council Traveller Accommodation Programme 2019-2024.
- The need for relevant HSE representation within DCC on relevant working groups and steering committees including an Occupational Therapist representation on the Housing Grants section.
- The need to predict and monitor population growth and subsequent demand for health services at Community Health Network level, this planning will support Health Needs Analysis for Community Health Networks.

Chapter 6: City economy and enterprise

CHO DNCC recognise that the commitment of DCC to job creation and education for marginalised groups, including those from disadvantaged areas, older people and people with disabilities. Within this chapter, tourism is identified as one of the key economic sectors. CHO DNCC recognise that events that promote tourism also have the potential to promote wellbeing, physical activity and social connectivity. CHO DNCC propose that;

- Events that promote physical activity, sport, exercise and positive mental health are increasingly supported across DCC and Healthy Food options are available at all events.
- Sponsorships for these events should not be accepted from high sugar and high fat food outlets (e.g energy drinks)
- Events should be delivered within environments that promote health and are smoke free.
- Events do not promote or endorse the use of alcohol and promote health protective behaviours: e.g. sun safety, positive sexual health.

In relation to healthcare and health related sectors, CHO DNCC propose;

- A collaborative approach to ensuring the Healthcare sector is an attractive place to work through consideration of mobility infrastructure to and from work.
- A collaborative approach to promoting workplace health, and health promoting employers (working with HSE, DCC and public and private sectors).
- An extension of the network of active travel infrastructure to and from healthcare facilities across DCC and the wider county working in partnership with other relevant Local Authorities.

- The monitoring of population growth and subsequent demand for health services at community health network level, this planning will support Health Needs Analysis for Community Health Networks.

Chapter 7: The city centre, urban villages and retail

In reference to section 7.5.1 General Retail Policy, CHO DNCC propose that the plan considers re-development of vacant units as social enterprise or community hubs for health and wellbeing activities. In reference to section 7.5.6 pg. 12, CHO DNCC urge Dublin City Council to ensure that:

- The smokefree policy is extended to outdoor dining areas to protect people from the dangers of second hand smoke and reduce tobacco litter.
- Cafes and restaurants provide opportunities for healthy food choices to be made.
- Limitations to access of unhealthy foods are in place i.e. high fat and high sugar food takeaway licenses in local areas.
- Limitations to access of alcohol through the limitation of off licences and bars in public epicentres.
- Public epicentres have links with grow your own schemes and fruit and vegetable market to support healthy eating opportunities.

Dublin City Council can support the promotion of healthy food policies by leading by example across all Council owned premises.

Chapter 8: Sustainable movement and transport

CHO DNCC endorse improved public transport and active travel infrastructure, an increased shift towards sustainable modes of travel and an increased focus on public realm and healthy placemaking, while tackling congestion and reducing transport related CO2 emissions as outlined in Chapter 8. Improvements in cycling and walking infrastructure both promote active travel, increase physical activity and recreation opportunities.

CHO DNCC acknowledges that consideration has been given to equality of to the built and external environment for all. CHO DNCC propose further consideration of active travel accessibility including:

- Bus stop locations designed to complement location of community facilities and health centres
- The provision of transport and active transport which is accessible for older people and people with disabilities.
- Working in partnership with other relevant local authorities to extend the active travel network across the county.
- Better cost-effective connectivity and movement at reasonable frequencies throughout the day will enable greater ease of use of healthcare services and support timely access to preventative care provided by mental health, primary care and disability services.
- Provision of Smoke free active travel routes particularly on active travel routes to schools, youth clubs, family resource centres etc.

Chapter 10: Green infrastructure and recreation

Accessible and inclusive green infrastructure and open spaces play an important role in the development of healthy sustainable behaviours. Opportunities to embrace open space, biodiversity, community gardening and growing your own are evidence based to promote health and wellbeing and improve quality of life.

This development plan demonstrates strong commitment to health and wellbeing through provision of parks and open spaces, biodiversity, sport recreation and play opportunities through implementation of the Active Cities Project and the National Physical activity plan. Section 10.5.4 pg. 370 refers objectives in provision of amenities in open parks. CHO DNCC endorse these amenities and further encourage the inclusion of:

- Opportunities for healthy food choices to be made and limiting access to unhealthy foods such as limiting ice cream van permits beside parks and playgrounds, improving access to fresh locally sourced produce and limiting high sugar/high fat food takeaway licenses in towns and villages.
- Provision and promotion of smoke free outdoor policies and the policing of same to protect people and ecosystems.
- Provision of local opportunities for the avoidance of drug/alcohol use and antisocial behaviour through the design and commissioning of novel and innovative solutions in partnership with stakeholders such as Foróige, CYPSC, LSPs, community development organisations.

We fully endorse the provision of children's playing facilities that encompass local and public places and spaces for play that are accessible and inclusive for children and young people of all ages, abilities and socio-economic backgrounds and the provision of children's playing facilities in new residential developments. The following should be considered in the provision of children's play facilities:

- Creating more accessible age appropriate and disability appropriate recreation areas to cater for targeted ages and abilities such as skate parks, multi-use games areas, adaptable equipment, outdoor gym equipment, and early years playgrounds in areas based on community need.
- Supporting Interaction between young and old and across cultures: the creation of sustainable community spaces that facilitate intergenerational interaction, for example, by providing facilities for longer dwell times and a mix of active and contemplative public spaces. Activities that foster exchange, such as community gardening, can also help reduce isolation among the elderly and increase compassion and empathy among the young.
- Spending time together for longer: Development of areas that have facilities including places to rest and shelter, toilets, water fountains and food outlets (serving healthier food options) encourage the wider community to dwell and enjoy the space. Combining this provision with high-quality playable space encourages families to bring children outdoors and spend longer outdoors.
- Designing walking routes and pedestrian areas to encompass play, arts and community information with careful consideration for the design of routes to school.
- Making the roads safer in residential areas by enforcing a speed limit or through placement of ramps.

- Providing secure places to lock bikes and scooters beside playgrounds, libraries, shops and public areas.
- Consideration for open spaces to promote informal play and interaction include street art, climbable objects, play streets temporarily closed to traffic.
- Provision of local opportunities for the avoidance of drug/alcohol use and antisocial behaviour through the design and commissioning of novel and innovative solutions in partnership with stakeholders such as Foroige, CYPSC, LSP, community development organisations.

Chapter 12: Culture

CHO DNCC endorse the inclusion of adaptation of existing facilities, initiatives and investments that aim to enhance cultural engagement for minority groups; including Travellers, migrant communities and the LGBTQIA+ community. CHO DNCC propose that:

- Cultural events should not promote or endorse the use of alcohol.
- Cultural events should promote health protective behaviours; e.g. sun safety, sexual health.
- Rooms within existing cultural and heritage buildings could be used in more diverse ways such as to facilitate health and wellbeing groups or meet ups such as breastfeeding groups, active ageing groups particularly at off peak times. This would provide existing health and wellbeing/community groups the experience of meeting in a local historic setting, enhance the use of the existing facility, and demonstrate a collective approach to the promotion of health and wellbeing. This could support peer led groups such as active ageing groups, chronic disease support groups, mothers groups etc. to access low or no cost facilities but also to experience elements of culture they may not be exposed to normally.

Chapters 14, 15 and 16: Land-use zoning, development standards and implementation

CHO DNCC support that Healthy Placemaking, inclusivity and accessibility form key design principles within the development standards giving consideration for the impact that these factors have on health and wellbeing and giving consideration to older people and those with disabilities. CHO DNCC emphasise the importance of appropriate planning for provision of suitable accommodation for older people and those with disabilities. We endorse the adherence to design criteria in provision of public realm, open space and play infrastructure. CHO DNCC acknowledge and welcome the commitment to provision of adequate childcare facilities in section 15.8.4. CHO DNCC propose that these facilities are:

- Established in communities on a not-for-profit basis and are affordable.

CHO DNCC acknowledge and endorse the commitment of the development plan in preventing excessive concentration of high fat high sugar food takeaways and off licences in Dublin City and prohibiting facilities within 250 metres of school sites and provision of assisted living facilities, nursing homes and bicycle parking facilities.

Conclusion

In order to improve the health and wellbeing of the population of Dublin City we need to continue to build on the joint working relationships between Dublin City Council, the HSE and the community and Voluntary sector. CHO DNCC welcomes any opportunities to engage in key issues which impact on the health of the community in particular with regard to the key recommendations identified within this document.

*Preliminary results

