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Rathgar
Residents' Association

PO Box No 9574, Dublin 6.

11/2/2022

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

Draft Development Plan 2022/2028

Dear Sirs/Madams,

The Rathgar Residents' Association (RRA) wishes to make the following submission on the draft development plan which has been placed before the citizens of Dublin for their comment and input.

Our Association represents up to 600 households in the Rathgar area.

The Association recognises the many achievements of City councillors, City management and staff over many years in advancing the city as an important economic and commercial centre as well as a pleasant place to live. It also recognises that at times there can be a major challenge in achieving a balance between these two objectives.

The Association also welcomes the continuing commitment in this draft city plan to the idea of Dublin as a low rise city and only permitting high rise developments in certain areas that are fitting for such development. The Association regrettably, has a sense from reading the draft plan that that commitment is a weakening ambition..

Dublin is a low rise city like many older European cities, Copenhagen, Paris, Madrid Frankfurt. These cities have maintained their core as low rise entities and have placed any high rise developments well away from that core.(it is worth noting that both Paris and Frankfurt do not allow buildings in their inner city to exceed 20m) The essence of Dublin is its low rise character both within the inner city and into its suburbs. That does not mean that it is low density. For instance it is also worth noting that the density of development in Georgian Dublin is 165 dwellings per ha. This compares with Copenhagen at 170 dwellings per ha and Amsterdam between 100/180.

However, we have seen in recent times many breaches of this objective. For instance the important historic area around Heuston Station, Royal Hospital Kilmainham, Kilmainham Gaol and the view of that area from the Phoenix park has been irretrievably damaged by a

high rise building that overhangs the Royal Hospital and its formal gardens and grounds. Also, in more recent years the developments of multi-storeyed residential blocks on the Clancy Barracks site are greatly intrusive on those views.

Areas of regeneration need to be planned properly with related heights which do not damage the existing built heritage. It doesn't make sense that developer led, site driven incongruous development such as the nine storey hotel proposed around the Cobblestone pub should have even got to the planning stage. This is due to the Specific Policy Planning requirements which has overridden all our planning rules. Compact growth can be achieved without the destruction of the city.

Looking at some other elements of the Draft Plan, particularly the thinking, planning and preparation for climate change, the RRA is concerned to note that a major development proposal for the Poolbeg area is now planned. This development of 34 hectares has been designated for fast-track planning permission for the construction of nine storey apartment blocks and up to 100,000sqm of commercial and retail space, including 3,000 homes and commercial space for 8,000 workers.

Climate change without doubt will present major challenges for the city. Arctic ice melt are forecast to add to sea heights of a metre or more. Increasing rainfall, with more severe storms and increasing tidal surges will most likely inundate existing coastal areas such as Clontarf and Sandymount. **Why then would Dublin City management even contemplate a coastal development such as this which within the next 15/20 years is going to be submerged beneath the waters of Dublin Bay?**

Turning to elements of the plan that would specifically affect the Rathgar area.

We believe that no plan for transport for the city should be left with another agency nor should the impact of The NTA's proposal for bus connect be ignored by any plans for the city

Rathgar Residents Association fully supports improvements to Dublin's bicycle lanes and public transport network, in particular from an environmental perspective. We strongly believe however that Rathgar's heritage and community should not be compromised by Busconnects, which - in its current form - at best promises to save commuters mere seconds off journey times. The price is too high for so little gain: historic railings, trees and curtilages are threatened in our area, particularly on Terenure Road East. Road-widening, which threatens the architectural layout of our streets is strongly opposed by the Rathgar Residents Association. Many of our smaller streets and their residents will suffer as a result of increased traffic flows and parking issues. This problem is not exclusive to Rathgar. Many villages across Dublin are at risk of losing their identity due to the current Busconnects design which is still based on outdated and inexplicable road widening. Rathgar Residents Association believes that a comprehensive underground metro would allow Dublin's residents, commuters and visitors to access the city and its environs whilst saving Dublin's built heritage and special character. As a short term solution there are many changes that could be made to make the current bus system more efficient at no cost to community and villages. These include policies aimed at reducing private cars on our roads for example implementing congestion charges and comprehensive park and ride facilities and also introducing, without delay, measures to improve bus journey times for example by

introducing priority bus lights and cashless fare on buses. The RRA believes that all non invasive improvements should be made before any irreversible and detrimental changes are made to our villages and streets.'

The following are some comments on the various chapters and appendices while critical we hope will be helpful.

Chapter 1 Strategic Context and Vision

There is a tendency in planning documents nowadays, in the public and private sectors, nationally and internationally, to always promise the best 'city in the world to live in', the best small country in the world in which to do business, the best company to work for' etc..

Our Association would settle for a well-run city. We would welcome the timely delivery of commitments made. Some local examples are the completion of Herzog park and the timely handing over of Marianella park to the city. Citizens are not seeking superlatives . It is counterproductive promising superlatives when the end result will always be less than superlative. DCC should be candid about this. Targets yes. Ambition yes. Unrealistic promises and language **no**.

Chapter 1 refers, for example, to the City Council's "commitment to promoting compact growth and ensuring the consolidation of the city ...". There is no evidence to suggest that that commitment will ever be met.

Chapter 2 Core Strategy

We support the compact growth principle but there is no reference in Chapter 2 to how compact growth would operate alongside the 15 Minute City concept. We welcome the reference in Chapter 2 to monitoring and evaluating the measures in the Plan. Monitoring reports should be robust, regular, candid and published, including about how political parties, vested interests, the courts and indeed the public are resisting the measures in the Plan. Turf wars with other state bodies should also be candidly acknowledged.

There is a great deal of text in Chapter 2 about the many pieces of legislation, strategies, frameworks and plans into which the City Development Plan must fit. That should underline the need for the Plan to be realistic in terms of what can be achieved. The Plan should refer as much to the challenges faced by the Council in meeting its housing objectives, e.g., political parties opposing projects of which they are in theory in favour because of the NIMBYism of their constituents, the involvement by the courts in planning issues, as well as to the opportunities. A bit of hard reality would give the Plan the kind of edge it must have to be credible. A great deal of Chapter 2 is about housing but the core strategy of a city extends beyond housing. The RRA does not get the impression that there is in reality a core strategy. There appears not to be a strategy for instance

- To limit the size of the city,
- To be specific about density (where and where not),
- To challenge vested interests,
- To question the involvement of the courts in planning issues,
- To be clear about the need for an underground in Dublin and the failure of the State to
- have one in place 100 years after independence, etc.,

None of the above in plain terms has made it into the Plan.

Chapters 3 and 9

Chapter 3 Climate Action

Climate change is going to severely impact the city (and the country), probably for several generations. The RRA agrees with DCC that climate change brings opportunities (e.g., new methods of generating power and the jobs that will arise from retro-fitting) as well as threats. We would welcome more emphasis on the opportunities whilst being candid about the threats. (See our reference above to the Poolbeg development)

We welcome the reference to mitigation and adaptation in the draft Plan. The year 2021 will probably be seen in retrospect as the year the world (governments and people) began to wake up to the reality of climate change although the RRA acknowledges that DCC has been planning for climate change for some time. The RRA would welcome a candid comment in the Plan that some national plans (which obviously have an impact on the city and its residents and businesses) contain unrealistic targets. The world's governments are trying to take shortcuts (e.g., by claiming that certain targets can be met by 2030) that they know are unrealistic. There are no shortcuts to dealing with major challenges like climate change. Planning and action will help mitigate the challenges ahead but it is too late now to avoid some of the consequences of climate change!

Chapter 9 Sustainable Environmental Infrastructure and Risk

Section 9.5.3 is important but very technical. More user-friendly language would be welcome. This is an area of the Plan that is very likely to impact significantly on the city in the future. Natural flood risk mitigation measures (or, as the RRA understands it, working with nature) could turn out to be as important, if not more important, than engineering schemes. Based on what we know about the likely direction of climate change, we suspect that engineering solutions, even large and expensive ones, might stand little chance against the forces of nature.

The RRA welcomes the emphasis on surface water management. We would welcome the inclusion of a commitment in the Plan that the existing surface area of the city is as capable of absorbing heavy rainfall as it is possible to be. The RRA believes that DCC needs to visit every garden, every apartment complex, including their car parks, every office with outside grounds to check if their gardens and grounds need to be changed from concrete to gravel or grass to give them (and their neighbours) a reasonable chance of withstanding the inundation that we can expect regularly from now on. Also, it should be remembered that each open site that is built upon removes an area of absorption. Such needs to be counted as a loss in the capacity of the city's surface water management.

We note from our previous contact with DCC that the latter believes that it is up to each property owner (the RRA is thinking here, in particular, of basement properties) to judge the risk to their property from future heavy rainfall and protect it as they see fit. This is unacceptable to the RRA. Given the scale of the challenges ahead, including 100-year pluvial flood events, which might become regular and indeed occur once a year, it will not be acceptable to leave it solely up to each property owner to protect their basement properties. Our concern here is not with DCC's intentions but with how they will be achieved given the age of much of the city's drainage. This is not addressed in the Plan nor is there any reference to the usual objections to any planning initiatives that are likely to affect the capacity of DCC to address flooding issues.

It is because of the absence of information in the Plan about how the challenge of surface water management can credibly be met that the owners of properties/businesses with

basements (including the owners of apartments with underground car parks) cannot be left to deal with flooding on their own. It is not realistic to expect residents and business to study detailed documents, appendices and maps. The RRA believes that every household, business and organization in the city (and county, in co-operation with the other local authorities in the county) should receive a booklet, during the period of the next Plan, in plain English, about the likely impact of climate change on their location over the next thirty years. It should cover everything from coastal flooding to fluvial flooding, to the impact on underground rivers, to waste water management (the absorption capacity of the city) to deliverable plans for updating the city's drainage systems (under pressure anyway even without climate change), to basement living and more. It should leave no one in any doubt about the challenges that lie ahead.

DCC's modelling should be verified by an outside agency and the results included in the Plan's appendices, which should be revised, where necessary, to take account of the outside agency's opinion. Where the modelling is not updated to take accounts of the comments of the outside agency, this should be stated in the relevant appendix and property owners in the areas affected informed.

Chapter 4 - Shape and Structure of the City

The Plan should provide an outline of how the city compares today to, say, twenty years ago under specific headings (density/spread, housing, how previous Plans have been successful or not, public transport, etc., etc.). Chapter 4 lists the challenges – it presses all the right buttons about balance, sustainability, urban decay, the long-term resilience of the city centre. All are just platitudes, however, in the absence of the power and the will to meet those challenges. Increased height must be confronted but must not get out of hand. The fundamental decision that has to be confronted is: Does Dublin go up or outwards? If we go up, how and where do we go up? Under what criteria and with what safeguards? That is not a bureaucratic argument but a political and cultural argument. Areas set out for high rise must be clearly defined well in advance. Citizens must be consulted and persuaded that that is the right location and the present practice of “creeping highrise “ must end if citizens are to be satisfied.

Urban design and architecture are often seriously neglected by all concerned. Streetscapes must be respected. Frequently, streets seem to be architecturally anarchic. Likewise, there is no reason why there should be endless, dull, characterless housing estates, apartment development, hotels etc. The public areas of the city should be well designed, attractive, with appropriate signage. It is as easy to do things well as badly,

Chapter 5 Quality Housing and Sustainable Neighbourhoods

There are references to the Metropolitan Area Strategic Plan, Local Area Plans, Strategic Development Zones but in the absence of a concise document there is very little idea of what they mean. The RRA welcomes the reference to the 15 Minute City (page 167) as the policy of the City Council but we don't believe that the draft Plan makes clear what the 15 Minute City means for Dublin or how it will influence the development of the city. It appears to be just an idea that has not been fleshed out.

Chapter 8 Sustainable Movement and Transport

The RRA supports the transition away from cars and fossil fuel-based mobility **but it will take longer than the Government has suggested.** The lack of a comprehensive underground/metro system after 100 years of independence is inexplicable and makes any

Finally, the RRA trusts that the above comments, suggestions and ideas are helpful and will assist in making the final proposition a more concise, credible and deliverable plan that will support and set the direction for our city in the coming years.

Yours faithfully,

P.P. 

Sue Millar

Chairman