



## Inchicore Regeneration Consultative Forum

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 DCC South Central Area Office  
 Marrowbone Lane  
 Dublin 8  
 14<sup>th</sup> February 2022



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

### RE: IRCF Submission on Dublin City Development Plan 2022-2028

To whom it concerns,

On behalf of the *Inchicore Regeneration Consultative Forum (IRCF)*, we wish to lodge written submission in relation to the Dublin City Development Plan 2022-2028.

The *IRCF* work in collaboration with Dublin City Council supporting the development of a high quality, vibrant, stable mixed use urban quarter on the DCC Emmet Road site, Inchicore that will be managed in a professional manner. We believe the proposed Development should provide secure permanent homes to the Inchicore/Kilmainham Area. The IRCF's role is to facilitate the local community to influence the proposed development in an inclusive, meaningful and genuine way.

Below is a table of points we ask you to consider:

	Chapter	Section	Suggestion/Query
1	2. Core Strategy	2.3.1 Capacity at SDRA Lands	SDRA 9 Emmet Road - estimated capacity 1050 over 15 ha. IRCF have a query - given that the ERD is expected to have circa 500 units where are the other 550 units expected to be located?
2	2. Core Strategy	2.7.3 URDF Funding amendment and objective	The IRCF request that ERD regeneration project apply for URDF funding for Community and Civic Buildings capital and operational (initial few years) budgets as suggested by Minister for HPLGH Mr. O'Brien TD at his meeting with the IRCF meeting, 2.12.21. This should be included in the DCDP 2022-2028.

3	5: Quality Housing & Sustainable Neighbourhoods	5.5.4 Social Inclusion	<p><b>Change Objective QHSNO10 - Universal Design</b> which states:  <i>To require a minimum of 10% of dwellings in all schemes over 100 units are designed to accommodate people with disabilities and older people in accordance with the Universal Design Guidelines for Homes in Ireland 2015<sup>1</sup></i></p> <p><b>To:</b>  50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people and people with disabilities accordance with the standards set out in the Universal Design Guidelines for Homes in Ireland 2015 (see also section 15.9.2)<sup>2</sup>.</p>
4	10: Green Infrastructure and Recreation	10.5.8 Sport, Recreation and Play	<p><b>Policy GI49 - Protection of Existing and Established Sport and Recreational Facilities (pg. 382)</b>  The IRCF support this DCC Policy to protect existing and established sport and recreational facilities, including pitches... unless the loss would be replaced by equivalent or better provision in terms of quantity or quality in an accessible and suitable location.... the benefits of which would clearly outweigh the loss of the former." With regard to the Inchicore Sports Centre and the current pitch the IRCF would like assurance that the above policy is applied to plans for the ERD.</p>
5	10: Green Infrastructure and Recreation	10.5.8 Sport, Recreation and Play	<p><b>Policy - G151 Children's Playing Facilities in New Residential Developments</b>  <i>To seek the provision of children's playing facilities in new residential developments. To provide playgrounds to an appropriate standard of amenity, safety and accessibility and to create safe and accessible places for socialising and informal play. (pg. 383)</i></p> <p>IRCF believe that there is incoherence between this policy and the SDRA guidelines that DO NOT specify play spaces for children up to 18 years of age. The culture of 'no ball games' in gated apartment buildings needs to end, and it be made clear that well designed play space for children up to 18 is not optional. It is compliance with the law. If a development is only 1 and 2 bed apartments and studios, this is not a valid excuse to leave out children's play spaces. SDRA guidelines must comply with the law that protects children's right to play up to 18 years of age.</p>
6	13. SDRA	13.2 Overarching Principles	<p><b>CONSTRUCTION PROTOCOLS</b>  The IRCF seek the adoption of the Docklands Construction protocols for the redevelopment of SDRA 5, SDRA 7, SDRA 9 and SDRA14 and this included in the overarching principles of these SDRAs.</p>
7	13. SDRA	13.2 Overarching Principles	<p><b>MOBILITY PLAN</b>  The IRCF see the addition a traffic mobility plan for the area, especially given the impact that the proposed Bus Connects Routes that travel through the area will have on traffic movement in the neighbourhoods of Inchicore and Kilmainham. We request that this is included within the overarching principles of SDRA 5,7,9,and 14.</p>

<sup>1</sup> The CEUD Universal Design Guidelines for Homes in Ireland <https://universaldesign.ie/Built-Environment/Housing/>

Sets out three tiers of UD Home

- Standard UD Home – optimising flexibility, adaptability and usability for everyone;
- UD Home + - providing for greater accommodation of people's changing needs over time;
- UD Home ++ providing guidance and design tips to facilitate person-centred bespoke design.

<sup>2</sup> This target is in line with Housing Options for an Ageing Population Policy Statement 2021, Government of Ireland, and the Guidance in the Design Manual for Quality Housing 2022, DHLGH.

8	13. SDRA 9 Emmet Road	13.11.3 ERD Site	In relation to heights, the current design is adhering to the DCDP 2016-2022 that limits the height on the build to less than 24 metres. The proposed DCDP 2022-28 states: "the Emmet Road site is considered capable of delivering baseline height of 8 storeys with locally higher buildings in specified locations as detailed in the Guiding Principles Map, figure 13.9, subject to detailed design and compliance with Appendix 3 of the development plan" pg. 539. Can we get clarification on whether the application to ABP will be delayed until the DCDP 2022-2028 is ratified and therefore will allow for this suggested increased height/density? Or will it be the case that there might be an alternation to the design after the application goes to ABP when the DCDP 2022-2028 comes into place?
9	13. SDRA 9 Emmet Road	13.11.3. ERD Site	SDRA Guiding Principles from DCDP 2016-2022 are no longer included in new proposed DCDP. This is a concern given that in DCDP 2016-2022 it stated that "variety of housing tenure and unit types will be sought in order to achieve a balanced and sustainable community" this needs to be altered to reflect the cost rental aspect of the ERD and then this guiding principle needs to be reinstated in the DCDP 2022-2028. Secondly another guiding principle that has disappeared from the new DCDP is "Innovative proposals that create a landmark destination within the city for combined facilities of a community, recreational, leisure and sports nature will be promoted, such facilities shall integrate positively with the existing sports facilities on the site". This is another guiding principle that needs to remain in the new DCDP.
10	13. SDRA 9 Emmet Road	13.11.3. ERD Site	IRCF suggest explicit "30% social; 70% cost rental units will be the tenure distribution" is added to the ERD guiding principles.
11	13. SDRA 9 Emmet Road	13.11.3. ERD Site	IRCF suggest that the same analysis as used for the Liberties sub area be applied, indicating that the demand for 2 and 3 bed units now exists, and that 2 and 3 bed units make up a significant number of apartments in the ERD. The Liberties are suggesting a minimum of 15% 3+bed in developments and a maximum of 25-30% one bed/studio apartments. (See Appendix 1, pg. 58 for Sub city residential mix requirements).
12	13. SDRA 9 Emmet Road	13.11.3. ERD Site	Request another guiding principle be added to the DCDP re the pepper potting (no segregation) of social and cost rental units within the ERD. This commitment has been stated by DCC to the IRCF. This is outlined as an assurance in Appendix 1, section 7.3, pg. 75 of the DCDP.
13	13. SDRA 14 St James Medical Campus and Environs	13.16 Land Use and Activity	Land Use and activity points out "The work of the St James's Hospital Community Benefit Oversight Group shall continue to ensure that as the campus is regenerated, so too are the benefits shared in the surrounding communities" (pg. 578). The IRCF request that a Community Benefit Clause and Oversight be added as a guiding principle to all the SDRAs to ensure community gain in regeneration areas.
14	15: Development Standards	15.4.1 Key Design Principles: Healthy Placemaking	The IRCF support that "The provision of active recreation and sports facilities in new neighbourhoods and public spaces will be supported" is outlined in the DCDP policy GI27 and objective GI05), pg. 651. This point does not go on to explicitly include sports facilities (see page 652).
15	15: Development Standards	15.9.2 Unit Size / Layout	The IRCF support that "The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%). The layout of the larger units of each type should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015." (See footnote 1 above) (DCDP 2022-2028 pg. 693) <b>Add:</b>

			50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people and people with disabilities accordance with the standards set out in the Universal Design Guidelines for Homes in Ireland 2015 (see also section 15.9.2) <sup>3</sup> , 25% designed to UD Plus and 25% to UD++.
1 6	15: Development Standards	15.9.14 Lifecycle Reports	"All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme", pg. 701. The IRCF believe that the long term maintenance and management of the ERD is a key concern, and request that a model of long term not-for-profit stewardship, maintenance and management is used and included as part of the design process. This model must insure that all cost rental income is reinvested in ERD and provides continuity, commitment and care to this public housing initiative and thereby create a flourishing community. The IRCF request that this is added as a guiding principle to SDRA 9 Emmet Road guiding principles.
1 7	15: Development Standards	15.9.15 Operational Management and Maintenance	The IRCF believe that the long term maintenance and management of the ERD is a key concern, and request that a model of long term not-for-profit stewardship, maintenance and management is used and included as part of the design process. This model must insure that all cost rental income is reinvested in ERD and provides continuity, commitment and care to this public housing initiative and thereby create a flourishing community. The IRCF request that this is added as a guiding principle to SDRA 9 Emmet Road guiding principles.
1 8	16: Monitoring and Implementation	16.2 Collaboration and Engagement	The IRCF support the believe outlined that "The skills, awareness and competencies of the city's residents and users in additions to agencies and stakeholders at city, regional and national level are critical to building and maintaining the city's momentum on achieving sustainability" (pg. 772). The IRCF request that a dedicated DCC Community Engagement Facilitator be assigned to SDRA projects such that meaningful, genuine and honest consultation will happen and that DCC take full ownership of the process. This will lead to compliance with the Aarhus Convention, promoting public participation in decision making.
1 9	Appendix 1	7.2.3 Meeting Social Housing Needs of Older Persons & Persons with disabilities	IRCF welcome DCCs commitment to implementing Universal Design models on all new developments including ERD, appendix 1, pg. 70 (see footnote 1 above). <b>Add:</b> 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people and people with disabilities accordance with the standards set out in the Universal Design guidelines for Homes in Ireland 2015 (see also section 15.9.2) <sup>4</sup> . 25% designed to UD+ and 25% to UD++.

Below are points we support within the DCDP:

Chapter	Section	Point:
1. Strategy - Context Vision	Strategy principles 1. Social /Residential	IRCF agree with creating a network of sustainable neighbourhoods, with 15 minutes city as well as a place that recognises social inclusion and integration at its core.

<sup>3</sup> This target is in line with Housing Options for an Ageing Population Policy Statement 2021, Government of Ireland, and the Guidance in the Design Manual for Quality Housing 2022, DHLGH.

<sup>4</sup> This target is in line with Housing Options for an Ageing Population Policy Statement 2021, Government of Ireland, and the Guidance in the Design Manual for Quality Housing 2022, DHLGH

1. Strategy - Context Vision	Strategy principles 6. Healthy Placemaking	IRCF support principles that insure quality architecture, urban design and green space allow for healthy place making.
1. Strategy - Context Vision	Develop a shared vision	IRCF believe that this a crucial and very important action - Include citizens and civic leaders in decision making process
2. Core Strategy	2.7.3 URDF Funding. Objective CSO13	IRCF support the funding application for Kilmainham Inchicore Development Strategy (KIDS) implementation (planning, detailed design and construction) under call 3 of the URDF (This non statutory strategy was funded by URDF identifying potential projects including enhancement of K & I Villages, the Camac River Greenway and a Greening Strategy, as well as improving connectivity between K & I Villages, strengthen public realm and enhance the landscape character of the area which in turn will act as a catalyst for the urban regeneration of the area).
5: Quality Housing & Sustainable Neighbourhoods	5.5.4 Social Inclusion	<p>Policy QHSN18 – Youth Friendly City (pg. 174)</p> <p><i>To promote and support a youth friendly city including the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure. To promote a built environment in the inner city, developing areas and Strategic Development Regeneration Areas which support the physical and emotional well-being of children and young people. To promote policies and objectives that have regard to the Children and Young People’s Plans prepared by the Dublin City North and Dublin City South Children and Young People’s Services Committees and any future DCC Youth Friendly City Strategy including any future youth homeless strategy.</i></p> <p>IRCF strongly welcome the inclusion of the section on a Youth Friendly City in the draft development plan. Young people have long been overlooked in our city and our hope is that this is the beginning of a culture shift that sees young people as central to the positive development of Dublin city. In Dublin city, particularly the inner city, there is a serious issue regarding the lack of dedicated youth work space where youth projects are unable to operate properly due to a lack of suitable premises. This is an urgent and basic need that needs to be addressed in any development that is happening across the city as well as addressing the issue in the already built environment. <u>Dedicated youth space and infrastructure where young people are free from intimidation and from where they won't be just moved on sends a message to young people that the city is somewhere they are valued and can find belonging in.</u> However, young people get consulted a lot, promised a lot and could be forgiven for thinking that nothing will come of it.</p> <p>Other aspects of our city's development, including culture, housing, environment, must also take account of young people. What their needs are, how they engage with our city, how our city engages with them. Young people need to feel real ownership of their immediate area and also of their space in the city, they need to be part of the planning, decision making and delivery process.</p> <p>We strongly welcome the future development of a Youth Friendly City strategy that would consider our young people in the city as a whole. We believe young people are the future of our city and that it is vital to bring them to the centre of the planning of the future development of Dublin. If we want to see the vision of Dublin as “an attractive place to live, work and visit” realised, we need to ensure that it is a place where our young people can flourish.</p>
5: Quality Housing & Sustainable Neighbourhoods	5.5.8 Social and Community Infrastructure	5.5.8 states: <i>Social and community infrastructure is an essential part of all communities. The RSES states that successful places support a wide range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. Facilities like schools, health centres, childcare facilities, libraries, recreation, sports, cultural facilities and playgrounds can function as a focal points within their neighbourhoods and can provide venues for social activities and events.</i>

		The IRCF welcome the acknowledgement that social and community infrastructure is ESSENTIAL
11: Built Heritage and Archaeology	11.5 .1 Policies and Objectives - RPS	IRCF support Policy BHA2, especially point (e) and (h) that protect the integrity of Richmond Barracks and Goldenbridge Cemetery when designing the ERD.
12: Culture	12.5.3 Supporting Cultural Vibrancy in the City	Policy CU022 - SDRAs and large Scale Developments (pg. 448). IRCF welcome that SDRA 9 at ERD-must provide 5% community, arts and cultural and artist workspaces internal floor space as part of their development at design stage.
13. SDRA	13.2 Overarching Principles	The IRCF strongly welcome the Architectural Design and Urban Design Overarching principle that indicated the highest architectural quality ... in order to create long term viable and sustainable communities aligned with the principles of the 15-minute city (pg. 467).
14: Land Use Zoning	14.7.13 Zone Z14	IRCF support that "Z14 areas are capable of accommodating significant mixed use development, of which residential would be the predominant use, therefore, developments must include proposals for additional physical and social infrastructure/facilities to support same. (pg. 627)
15: Development Standards	15.9.2 Unit Size / Layout	The IRCF support that "The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%). The layout of the larger units of each type should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015." pg. 693
15: Development Standards	15.9.3 Dual Aspect	The IRCF support "Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations. Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate." pg. 694.
Appendix 1	7.2.3	7.2.3 Meeting Social Housing Needs of Older Persons & Persons with disabilities IRCF welcome DCCs commitment to implementing Universal Design models on all new developments including ERD, appendix 1, pg. 70
Appendix 1	7.3 Meeting Affordable Purchase and Cost Rental Housing Needs	IRCF welcome DCC stating that they will seek to ensure any selection of housing units provided by DCC counteracts undue segregation of persons with different social backgrounds. In far as practicable it will be a requirement that all new developments can be pepper potted across developments to ensure full access to available amenities and services for residents. (appendix 1, pg. 75)

We hope you favourably consider our submission.

Yours sincerely,



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