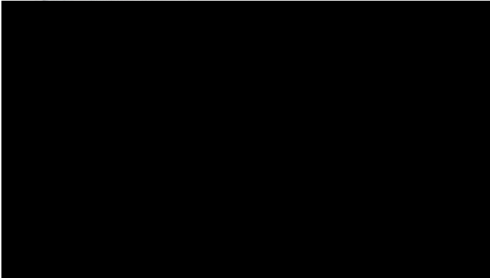


This submission contains comments on issues of general interest and on issues specific to Ranelagh.

**James Wrynn
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Ranelagh Village Improvement Group (RVIG)

DCC – DRAFT DEVELOPMENT PLAN 2022-28 –Submission

1) Chapter 2: CORE STRATEGY – Issues: Urban Villages; LAPs; Retail Strategy

The Ranelagh Village Improvement Group (RVIG) welcomes the focus on Urban Villages (including Ranelagh) as a significant element of the draft Plan. The current status and role of these important elements of Dublin’s past and future evolution has been clearly highlighted for the first time.

The Group acknowledges the specific inclusion of Ranelagh in the list of proposed Local Area/Village Improvement Plans (*Table 2-14; Schedule of Other LAPs/VIPs*) but notes that this is an intention rather than a clear commitment.

Similarly, a comprehensive Retail Strategy encompassing the Urban Villages is referred to in this Chapter and outlined in more detail later (*Chapter 7.5.3 Key Urban Villages, Urban Villages and Neighbourhood Centres*) but lacks detail on hospitality issues, for example, which are particularly important for the Ranelagh area.

RVIG stresses the need to move forward with these commitments in the final Development Plan and in its implementation.

2) Chapter 10: Microgreen Areas

Ranelagh Village Improvement Group (RVIG)

There are many places in the city that could easily accommodate a micro garden. There are many other places in the Villages and suburban shopping locations where wide stretches of concrete are the prevailing pattern.

A specific commitment would now be very helpful in relation to the development of micro green spaces

Submission by Ranelagh Village Improvement Group.

We propose the addition of the following to section 10.5 G102 (p 359)

DCC will develop 75 micro gardens across the city in suitable locations during the duration of this plan.

3) Chapter 10: Tree Canopy

Submission by Ranelagh Village Improvement Group

Street trees have the capacity to transform the public realm. Studies in a number of countries indicate that trees not only contribute environmentally but have contributed to reducing crimes in areas by up to 20%. The draft Plan notes the deficiency of trees in the much of the inner city. Many cities around the world now have specific commitments on street tree policy with ambitious projects running into tens of thousands of trees and in the case of New York one million trees. Existing trees also need to be maintained and replaced, alongside the requirement to plan for new plantings. Also, ongoing account must be taken during the period of the Plan of the impact of existing and new trees on the quality and safety of roads and footpaths, from both structural impacts and the seasonal effects of vegetation. The proper choice of tree variety is highly important in these regards.

A specific commitment is important in this area

Submission by Ranelagh Village Improvement Group propose the addition of the following to section 10.5 G102 (p 359)

DCC will plant 20,000 additional trees in streets , in the areas identified as most deficient in street trees, over the period of the plan, and maintain and conserve the existing tree stock.

4) Chapter 11.5.2: ACAs

Submission by Ranelagh Village Improvement Group (RVIG)

Dublin's urban villages are generally late nineteenth /early twentieth century developments. They tended to develop in a rather ad hoc way through adaptation of residential buildings with some additional more modern buildings. Some of them are characterised by very fine Victorian architecture including occasional new Victorian buildings designed for shops at ground floor.

Ranelagh is an outstanding example of a largely Victorian/Edwardian inspired such urban Village. Its attractiveness is characterised by a number of features:

- a) Groups of building (4-10 units) of symmetrical coherent design. In Ranelagh, these include in Ranelagh four such residential blocks and seven retail blocks. Each block is of uniform Victorian design.
- b) It is a very compact village.
- c) It has very clear boundaries not gradually spoiled at its boundaries by a mix of residential and shopping buildings.
- d) The buildings are almost all in good structural condition.

Such Village areas (and Ranelagh in particular) need to be protected to ensure that 'retail development' (including hospitality activities, for example), or inappropriate residential developments don't conflict with conservation and 'quality of environment' issues. Significant parts of the Victorian Urban Villages including Ranelagh need to be designated as areas of architectural conservation (ACAs) and receive special consideration alongside areas classified as Zone 8 (Georgian Conservation Areas).

The requirement of a modest prevailing height rule should apply to any new structures within an ACA

There also needs to be clarity and assurance for local businesses and residents that zoning will remain in place for the duration of the Development Plan. Any proposed changes should involve direct consultation with those working and residing in the affected areas, as well as with their local representatives.

Submission by Ranelagh Village Improvement Group:

Ranelagh should be added to the current list of 24 ACAs (Chapter 11.5.2) and its footprint designated as the road between Marlborough Rd and the Luas bridge at No 2 Ranelagh and also including Field's Terrace

5) Chapter 11: Built Environment/Public Realm – Streetscapes/Telecommunication Boxes

Submission by Ranelagh Village Improvement Group

The impact of Telecommunication boxes is a further issue . They attract graffiti, rubbish accumulation, inhibit pedestrian movement and more recently have started to be used as advertising platforms.

Submission by Ranelagh Village Improvement Group. Add the following:

Permission will not be granted for above surface telecommunication boxes. Advertising material on existing such boxes will be prohibited

6) Chapter 15.16: Transport

Submission by Ranelagh Village Improvement Group

Transport and traffic flows: the impact of changing transport patterns and plans, including the proposed BusConnects and Metrolink need to be clearly considered in both an Urban Village and a city-wide context. All decisions across the city must be based on comprehensive local Traffic and Transport Assessments (TTA) and Road Safety Audits. Encouragingly, the draft Plan acknowledges such plans and related decisions need to project forward 5 years and 15 years after the opening date in accordance with the TII Traffic and Transport Assessment Guidelines and the UK's Institution of Highways and Transportation Guidelines. RVIG has highlighted the fact that the Ranelagh area faces the prospect of a massive increase in transport and traffic congestion pressures arising from diversions aimed at reducing traffic flows elsewhere in the city.

While recognising that an additional concern around transport may be beyond the immediate scope of the draft Development Plan, RVIG wishes to highlight the **retail impact** of traffic congestion arising from diversions elsewhere: the diversion of traffic from Rathmines to Ranelagh arising from BusConnects further congests the village meaning that shoppers will divert to less congested retail locations further undermining the viability of our village. The choice of Charlemont LUAS stop as the proposed terminus for Metrolink means that those wishing to use the metro to and from the airport across the entire Southside will need to be dropped off/collected by private car/taxi in the area of Dartmouth Square. This type of neighbourhood-clogging congestion is in direct contravention to the 'fifteen minute city' model espoused in the plan.

Submission by Ranelagh Village Improvement Group wishes the following to be added to 15.16

Given the objectives of sustainable movement within the city and greater connectivity between urban villages in particular, a continuing process of transport assessment (taking account of all modes, both public & private) will take place throughout the period of the Plan

7) Appendix 3: 3.1 Height

Submission by Ranelagh Village Improvement Group

Building heights. This is one of the current most controversial topics about Dublin City. Some proposers of high buildings seem to believe Dublin should adopt a macho height culture to rival large cities around the world. Dublin is a small capital of a small country. That could be a useful starting point for starting reflections on its concept of itself. But even large cities do not all practice a 'Higher is Better' philosophy. Paris has rigorous control of heights and yet has a population density twice that of Dublin. Its building height approach has now meant they can actually now apply for UNESCO world heritage status for its unique attractive skyline.

The Draft proposes three categories of height: prevailing, locally higher and Landmark /Tall. It is surprising that there is no mention of the width of adjoining street context and the public realm issue. A ten storey building on a narrow street is a very different proposition to the same height on a wide street..

Prevailing height

The prevailing height is probably the more dominant one for local communities, villages and Key Urban Villages. The extent of deviation allowed for buildings higher than the prevailing height is unclear. While contexts differ, some tighter boundaries need to be set out.

District landmark buildings

The argument for local or district landmarks with 'Locally Higher Buildings' within an outer boundary of 50 metre is very excessive. This is two thirds of the height of Liberty Hall. Excessive heights can have very detrimental effects in areas where skyline profile is a key contributor to the environmental character of an area. The proposed limit is a license to have Dublin characterised by a series of very tall buildings, completely out of character with their locality and on an overall view of the city, create a bizarre roof/height profile. Traditionally such landmarks were provided by public buildings, buildings of outstanding architectural merit, but current developments are of little architectural merit and focus more on short term financial returns. The overall approach suggested will result in so called landmark building projecting in a haphazard fashion across the city as random spikes. The reality of many high buildings in recent times is of lego inspired designed towers with only one notable feature-height, masquerading as "iconic". Under the proposed guideline of 50 metres, a single landmark building could act as a precedent for further 50 metre high buildings.

Tall Buildings.

The key requirement of a landmark building is an architectural aesthetic of outstanding quality comfortable in its context. Height as the only defining characteristic of a landmark building is an injustice to architecture.

Submission by Ranelagh Village Improvement Group who propose the following amendment to replace the text on the tree category system proposed on heights:

Ranelagh Village Improvement Group propose that the prevailing height should generally apply. However much taller buildings will be possible in zones dedicated to taller buildings.

8) Appendix 17: Advertising and Public Realm

Submission by Ranelagh Village Improvement Group

The public realm is where physical interaction takes place between the people of the city. The management and design of the public realm is a defining feature of urban space. The public realm encompasses in particular all streets, squares, alleyways, lanes, parks and waterways. With mass motorisation in the 20th century, much urban public realm came to be viewed as thoroughfares for vehicular traffic. And while this narrow view has faded, sometimes the issue of public realm tends to still focus only on a small number of areas of very significant pedestrian traffic.

Public realm considerations include the design of buildings, their height in relation to the street width of their location, street surfaces, the balance of use between various kinds of movement (e.g. vehicular vs pedestrian), trees and micro green spaces, street and other signage and street furniture and lighting. (In the case of public lighting, RVIG would wish to acknowledge the Council's current response to our proposal to install appropriate 'heritage' lamp standards in Ranelagh Village centre).

Shadowing by tall buildings can significantly affect the feel of public realm space. The absence of street trees in certain inner city areas is noted in the plan which is an important issue in the public realm.

Large advertising billboards are significant despoilers of the public realm in Dublin.

These are now widely recognised as visual pollution and many cities have abolished them or are working in that direction. The pioneer of this was Sao Paulo, which removed 300,000 oversized shop signs and 30,000 Billboards. Paris has a five year plan of reducing numbers by 30%: In the US, the home of advertising culture, four states, including Maine and Vermont, have banned new billboards. The draft Plan proposes to prevent any new billboards in sensitive areas. This is very welcome, but does not go far enough. RVIG wishes to have the following inserted in Appendices, Appendix 17, (p 418 At opening of paragraph 1. This will make the rest of the section redundant.

Delete all of Section 1.0 and replace with

Submission by Ranelagh Village Improvement Group proposes the following changes:

Delete all of current Section 1.0 and replace with the following:

Given the visual pollution and defacement of the public realm by large billboard signs, planning permission will not be granted for any additional large bill boards signs. The Council will also seek to reduce the existing numbers of such signs.

END

Submission By Ranelagh Village Improvement Group (RVIG) to DCC on Draft Development Plan.