



# A more equal, diverse and sustainable city, more ambitious climate action and a fast and fair just transition

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Author: Alice Mary Higgins [redacted]

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Draft Dublin City Development Plan 2022-2028 (/en/consultation/draft-dublin-city-development-plan-2022-2028)

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Author: Alice Mary Higgins [redacted]

## Observations

### Chapter 3: Climate action (/en/submission/dcc-draft-10452/observation)

**Chapter:**

Chapter 3: Climate action (/en/consultation/draft-dublin-city-development-plan-2022-2028/chapter/chapter-3-climate-action)

- The last ten years have been the hottest in over 100,000, what we do in the next ten years really matters. In that context, the Development Plan 2022 -2028 should not only reflect and include policies to support Dublin’s transition to a



more sustainable and energy efficient future, it should also include policies that reflect the fact that we are currently in a climate emergency and immediate and early actions are needed to urgently reduce emissions in this decade.

- It is not appropriate for the Dublin Development Plan to frame its Climate goals in terms of “the implementation of the 2019 national Climate Action Plan” as the 41% emission reduction target under that Plan is completely insufficient and has been superseded by new national targets and legislation. The Climate Action and Low Carbon Development (Amendment) Act 2021 sets out a legal requirement for a 51% reduction by 2030
- While sectoral ceilings remain to be published and a variation in national guidelines are referenced in CAO2, it should be the case that national targets represent the floor and not the ceiling for our capital city and the Development Plan should reflect the need for urgent and ambitious climate action. the largest population centre in the country, and one with a history of exceeding national ambition in terms of climate, Dublin has an obligation to show leadership. I believe it would send a powerful international signal if Dublin were to aim for emission reductions in line with the global 7.6% average per annum called for by the UN Environment Programme. At an absolute minimum, Dublin city should be aiming to cut emissions by at least 51% by 2028.
- Given the risks associated with delays in climate action, the additional economic, social, environmental and reputational dividends which flow from early action, and the current favorable macroeconomic context in terms of EU financing and funding, Dublin should avoid backloading and work to achieve significant initial emission reductions within the first two years of the plan.
- **3.5.1** references policies in relation to sustainable settlement patterns. However, it omits any mention of Sustainable Development Goal 11 on “sustainable cities and communities”. Achieving the targets and indicators of SDG 11 by 2030 should be a core policy of Dublin City Council in all aspects of its work, and particularly in relation to policies on sustainability.
- In fact, all of the SDGs should be better reflected across the whole Dublin Development Plan, particularly as this has been stated as a requirement for Local Development Planning.
- **3.5.1** also puts emphasis on the concept of the 15-minute city. It is vital that in trying to instil this concept in Dublin’s urban framework, that it is a 15-minute

city that is accessible to all and the concept is grounded in the need to be accessible and intergenerational.

- Policy objective **CA5** aims to support the retrofitting and reuse of existing buildings. This is welcome, however priority should be given for retrofitting to social housing stock owned by Dublin City Council, with a target of at least 25,000 retrofits by 2025 and a goal of B2 standard. DCC should also set out a plan to accelerate retrofitting of all its other public properties and encourage the retrofitting of schools. DCC should consider direct long term employment of qualified staff to support, deliver and maintain public retrofitting.
- CA9 in relation to Climate Action Energy Statements should be revised to include a requirement for information on the amount of carbon equivalent emissions estimated to be released as part of the construction of each new development, including any embodied energy released through proposed demolition and in so far as possible, estimates of Scope 3 supply chain emissions. This is important because simply including future energy plans is not just inadequate in terms of climate action, it could be actively misleading. For example, it could create the false impression that a particular development was 'green' or 'sustainable' when it may in fact contribute to a net increase in emissions for the next sixty years.
- It is vital, particularly over the next decade which includes the lifetime of this development plan, to avoid the release of embodied emissions wherever in public planning in the UK with some scientists calling for a strong presumption against most demolition or even a temporary moratorium until other areas of emission reduction have started delivering.
- Section 3.5.4 should set out clear goals and commitments in regard to avoidance of demolition and monitoring and reduction of Scope 3 emissions in construction.
- 3.5.3 outlines the numerous policies in relation to energy, with DCC to "support and encourage" the production of various forms of energy. It is important however that priority be given to forms of energy for which adequate technology already exists and which is not reliant on fossil fuels. It should also be the policy of DCC that no planning permissions should be granted to developments of new fossil fuel infrastructure, including production or transport infrastructure for LNG.
- In respect of decarbonising zones, DCC should ultimately be aiming to decarbonise the entirety of Dublin City and where certain areas of the city are required to decarbonise earlier, additional supportive measures should be

provided to protect and support those who are more vulnerable, including accelerated retrofitting of all social housing and public buildings in such zones. Just transition should be both fast and fair.

- In respect of CA22, it should be the policy of DCC to reflect incoming national legislation in respect of the Circular Economy and to seek to provide additional measures in respect of the reuse, repair and recycling of goods.
- While CA23 is largely welcome, especially reducing demolition, consideration should be given to shifting to the language of “material management” rather than just “Waste management”
- Climate Action and a Green Economy require new kinds of spaces for new kinds of activity. The Dublin City Development Plan should plan for and support the provision recycling facilities, repair cafes, last mile depots, salvage yards and light green industry within most neighbourhoods and urban villages. In light of the new rules on single use plastic, the city is also likely to need at least two new large public industrial washing facilities to support the reuse of food containers etc.
- All of these kinds of activities provide economic and social opportunities and community wealth building, local climate cooperatives and initiatives such as Phibsboroughs "Transition Community" should be actively recognised and supported throughout the Development Plan, including in the chapters on Enterprise and Zoning.
- Community Centres and Dublin Libraries might also be resourced to play a role in supporting access to local repair services etc.
- In 3.5.5 there should be a second policy included which recognises that electric vehicles are not the sole or primary sustainable transport solution and that particularly in an urban area like Dublin, cycling and pedestrian infrastructure must be prioritised over road infrastructure. The Development Plan should aim that over the course of its existence, that cycling and pedestrian infrastructure would be greater than road infrastructure in Dublin. The proposed modal shifts as outlined in Chapter 8 are entirely inadequate. We should not be planning to retain the dominance of private cars, regardless of whether they are electric or not, and if we are serious about a 15 minutes city that means doubling pedestrian activity rather than the measly 2% increase proposed, Cycling should also be increasing by far more than currently proposed. Far greater ambition is needed – for example walking, cycling or public transport should account for at least 80% of journeys to school by 2028.



- In the policies attached to 3.5.6, there should be the caveat that any flood risk adaptation measures must not interfere with biodiversity or ecosystems which exist in the city and that strategic environmental impact assessments would be carried out wherever such infrastructure is proposed.
- In 3.5.7, as well as restoration and conservation of ecosystems, it should be a stated policy to promote the development of novel urban ecosystems where they may occur and that urban nature is not destroyed for aesthetic interests or for the convenience, as opposed to the safety, of property owners.
- The Development Plan should explicitly prohibit the removal of public trees in order to reduce insurance premiums.
- In 3.5.8, it is welcome that the plan includes an integration of climate action policies into other areas, however it should be the case that all policies contained within the Development Plan are climate-proofed and biodiversity-proofed and that the policies of DCC are designed to fit within climate action plans and planetary limits.

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## Chapter 10: Green infrastructure and recreation (/en/submission/dcc-draft-10452/observation-0)

### Chapter:

Chapter 10: Green infrastructure and recreation (/en/consultation/draft-dublin-city-development-plan-2022-2028/chapter/chapter-10-green-infrastructure-and-recreation)

### Public Rights of Way and Permeability

Chapter 10 of the draft Dublin City Development Plan includes the objective to 'identify further significant public rights of way during the lifetime of the development plan and to update the 'Public Rights of Way' map.

Directly below this objective, 'Figure 10.5 Public Rights of Way' depicts a minimal map highlighting just 8 public rights of way in Dublin. It is not clear whether these are pre-existing rights of way or whether the new Dublin City Development Plan is indicating a wish to prioritise establishing them as new public rights of way.

The Development Plan must make it explicitly clear that this map does not constitute the full extent of existing or proposed public rights of way and that any public right of way which existed prior to the publication of this plan should be considered as continuing to exist.

The Development Plan should also include a specific timeline and strategy around the proper updating of a 'Public Rights of Way' map and a further mapping of the wider network of public, private, permissive, prescriptive and de facto rights of way across the city, highlighting for example how public rights of way intersect with for example, mews lanes, estate laneways and other passageways throughout the city. This mapping would allow analysis of the networks of accessibility, connectivity and practical permeability throughout the city and would also allow for the identification of gaps and obstacles.

The erosion of public space and permeability by private development is a real concern. It is really important and these maps should be considered in relation to planning applications, any new proposed development should be required to illustrate how it will enhance and support networks of connectivity in the area and support permeability and the realisation of a 15 minute city. It is also important that when buildings seek to satisfy density or permeability requirements by showing plans with walkways or throughways such as scenic access routes to a canal or river – those need to be fully accessible to the public and not solely the residents of the building.

The concept of permeability relates to the retention and creation of linkages within the urban environment for people to walk and cycle from their homes to shops, schools, local services, places of work and public transport stops and stations. There is a renewed focus on permeability in many towns and cities, that is, the ease to which the public can move through towns and suburbs via laneways and urban rights of way. Increasing permeability over the coming years will be key to the achievement of the '15 minute city' or the '10 minute town', as should be the goal in some of Dublin's urban villages.

In 2011, the National Transport Authority published a Permeability Best Practice Guide on how best to facilitate demand for walking and cycling in existing built-up areas.[1] Section 4 of the NTA permeability guide specifically highlights the downsides of extinguishing urban rights of way, which is increasingly taking place in an effort to counter anti-social behaviour. The NTA strongly recommends retaining these rights of way and proposes a series of measures to make these urban linkages safe spaces.



The process to extinguish a right of way in Dublin should be made more rigorous. A vote on a proposal to extinguish a right of way must not be taken at the same meeting where the proposal is first made. There should be an interval of at least 8 weeks from the date a proposal is made to extinguish a right of way and a vote being taken on the matter. Moreover, any proposal to extinguish an existing public, private or permissive right of way should be accompanied by a written analysis of the impact such an extinguishment would have on the permeability and accessibility of the locality and also on local shops and businesses.

When buildings seek to satisfy density or permeability requirements by showing plans with walkways or throughways such as scenic access routes to the canal or river – those need to be actually fully accessible to the public.

It is also important that public rights of way are vigorously maintained and more use should be made of the power to declare new rights of way in order to enhance urban safety, permeability and accessibility. Both of these measures would enhance the feasibility of the 15 minute city.

These concerns and points re rights of way and permeability are also relevant to

- **Chapter 4, Shape & Structure of the City**
- **Chapter 5, Quality housing and sustainable neighbourhoods**
- **Chapter 8, Sustainable movement and transport**

### **Open Space and Tree Strategy**

The plan should make it clear that encouraging multi functionality of Open Space should not be at the cost of existing ecological benefits or biodiversity. Biodiversity must be a consideration throughout all urban space – not confined to a 'quarter' or a

decorative showpiece. All open space planning should also incorporate consideration of wildlife corridors and the cities pollinator plan

It is welcome that G125 sets out a requirement for open space per 1000 persons but this does not address the fact that many areas of the city, such as Dublin 8, have far less access to such space than other areas. I therefore suggest that a new objective be set that any person in the city should not be more than two kilometers away from accessible open public space and biodiverse natural amenity.

G126 in relation to the acquisition of new public space is welcome and it is also important that a mechanism be set out whereby informal green spaces such as community gardens etc can access recognition, protection and support.

## **Tree Strategy**

The lack of legal teeth as identified in the previous Tree Strategy should be addressed, More robust measures are needed to protect trees and minimise removals.

The sequesterisation of carbon should be listed as one of the considerations in relation to tree protection and an estimate of the embodied emissions to be lost should accompany any request for tree removal.

Particularly during the climate emergency period of the next ten years, the prevention of any avoidable emissions must be a priority and the planting of new trees, while valuable, is no substitute for the retention of established and existing trees.

Section G141 is too weak, the presumption in favour of retention should apply to all trees, with a strong presumption or even 'prohibition with exceptions' for those trees considered valuable.

There should be extremely limited tolerance of compensation payments as a substitute for retention and any request for removal should be accompanied by full evidence of all alternatives, including root binding and relocation having been fully considered ^



The Development Plan should explicitly prohibit the removal of public trees solely for aesthetic reasons or for the purpose of reduced insurance premiums.

[1] [Permeability\\_Best\\_Practice\\_Guide\\_NTA\\_20151.pdf \(nationaltransport.ie\)](https://www.nationaltransport.ie/wp-content/uploads/2011/12/Permeability_Best_Practice_Guide_NTA_20151.pdf)  
([https://www.nationaltransport.ie/wp-content/uploads/2011/12/Permeability\\_Best\\_Practice\\_Guide\\_NTA\\_20151.pdf](https://www.nationaltransport.ie/wp-content/uploads/2011/12/Permeability_Best_Practice_Guide_NTA_20151.pdf))

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## Chapter 5: Quality housing and sustainable neighbourhoods (/en/submission/dcc-draft-10452/observation-1)

### Chapter:

Chapter 5: Quality housing and sustainable neighb... (/en/consultation/draft-dublin-city-development-plan-2022-2028/chapter/chapter-5-quality-housing-and-sustainable-neighbourhoods)

### Regeneration, Vacancy

As stated elsewhere in this submission, the reclamation, refurbishment and reuse of derelict and vacant properties should be an absolute priority within the Development Plan, not just in terms of housing need but also in terms of emission reduction. “The most sustainable building is the one that already exists”.

That is why we need more robust and active use of both the Derelict Sites Act and the vacant site levy to activate vacant or unused properties and sites around the city.

The draft development plan says that: “The vacant site levy will continue to be used as an effective active land management mechanism to encourage infill development on key sites throughout the city”, and that “compulsory purchase” of land under the Derelict Sites Act 1990 will also be used to activate unused land and buildings around the city.



QHSN7 and QHSN8 are good in principle but they should include stronger and more specific targets and commitments.

It has been well documented that the vacant site levy and the Derelict Sites Act have been woefully underused and badly enforced by DCC since their introduction. In January of this year, it was reported in several media outlets that “€20 million in vacant and derelict site levies owed to Dublin City Council remains outstanding”.<sup>[1]</sup> To give an idea of the scale of underpayment - in 2020, just €275,450 was paid in vacant levies when €10.8 million was demanded. This means that only 2.5% of monies owed were actually collected for 2020.

It has further been reported that DCC has acquired only 25 properties through CPO in the last five years.<sup>[2]</sup> Given estimates by the CSO and several property companies that there may be close to 180,000 vacant properties in Ireland<sup>[3]</sup>, the figure of 25 properties seems very low. Given the scale of non-compliance with the vacant and derelict site levies, it seems obvious that many more sites would have been eligible for compulsory purchase in this period.

The draft plan says that the “vacant site levy will *continue* to be used as an effective land management mechanism...”. yet it has clearly not been effective up until this point, and yet this is not acknowledged in the draft plan. There can be no continuation of ‘business as usual’ when it comes to the non-enforcement of the vacant site levies, and it is not enough to just do better as we go forward.

Section 5.5.2 should be amended to acknowledge the failure to implement the vacant site levy up to this point and include a commitment to overhaul enforcement of with clear and ambitious collection targets. The Development Plan should also



include policies and targets around the active pursuit of past monies due under the vacant sites levy and the ringfencing of funds thus gathered for compulsory purchase and or refurbishment of vacant or derelict buildings by the council.

There should also be a commitment to ramp up the use of compulsory purchase orders.

The government's Housing for All plan has included suggestions that there may be a vacant property tax in future, but until such a time as this policy is enacted, DCC should assume that the vacant site levies and derelict site register will be the main tools to activate unused sites. As such, the enforcement of these tools should be a major priority.

#### **5.5.4 Social Inclusion**

##### **The Traveller Community**

The draft plan notes that: "In Census 2016, 2,080 of the city's population were from the Traveller Community, accounting for 0.4% of the overall population. Service provision and community facilities for Travellers should reflect and respect the varying needs of the Traveller community". I support this statement, but have serious concerns about the implementation of Traveller accommodation under DCC.

I therefore support QHSN13 and QHSN14 in principle. However, I note that the DCC has repeatedly failed in its provision of suitable accommodation to Traveller families. These failures must be addressed in the finalised development plan, with clear and detailed strategies outlining how past failures will be remedied and how future targets will be met.



In 2021, it was reported that the redevelopment of the Labre Park site in Ballyfermot, Ireland's oldest Traveller accommodation site, would be postponed yet again, 21 years after the redevelopment was originally promised.[4] I note that redevelopment plans for Labre Park were included in each of the council's Traveller Accommodation Programmes (TAP) since 1999, but the redevelopment was never carried out. I acknowledge the flood risk at the site, but it is imperative that DCC provide appropriate accommodation for all the Labre Park families without delay, in a suitable area with proper sanitation facilities within the same locality. The finalised development plan should include a detailed strategy for how the Labre Park families will be adequately provided for in a safe, suitable, nearby development.

An investigation recently revealed that DCC only drew down 71% of its budget for Traveller accommodation between 2017 and 2019.[5] This is particularly astonishing given that the Labre Park redevelopment has been overdue for two decades, and that the overcrowded and unsanitary conditions resulted in a recent Hepatitis outbreak at the site.

The draft plan speaks of social inclusion through the provision of Traveller-specific accommodation, yet lacks any detail on how it will honour this commitment to social inclusion. So far, there has been a low output of new Traveller accommodation sites under the DCC, as well as failures to provide adequate sanitation and other essential facilities to existing sites. The finalised development plan should include detailed strategies outlining how these failures will be addressed going forward, with clear and ambitious targets regarding new Traveller accommodation sites, and ambitious upgrades to existing sites.

Until now, accommodation sites for Travellers have been inadequate, often lacking even basic sanitation facilities. The DCC needs to move beyond this skeletal approach, and on to a more holistic approach to Traveller housing, which not only provides accommodation, but also provides community resources. More detail on these Traveller resource centres would be welcome in the final version of the plan:



how many resource centres would be possible, and where would they be located? Are there detailed proposals for specific sites, and if so, can some of this detail be provided?

The recognition of horses in Traveller culture and in wider urban and suburban communitiies should also be recognised and supported in the plan

### **5.5.5 Housing for All**

#### **Emergency Accommodation and Homeless Services**

QHSN26, QHSN27 and QHSN31 relate to emergency accommodation and homeless accommodation. These strategies outline that public bodies applying for new emergency accommodation centres will be “requested to submit evidence to demonstrate that there is not an over-concentration of emergency accommodation within an area”.

These strategies need to be amended. While it is important that emergency accommodation be appropriately distributed throughout the city, not enough detail is provided in relation to crucial priorities including strategies to

(1) to reduce reliance on emergency accommodation;

(2) to transition from use of private emergency accommodation (i.e. hotels and hostels) and family hubs, to an own-door system of emergency accommodation, similar to the Tallaght Cross initiative;

(3) to drastically reduce the average time spent by families in emergency accommodation and the impact of such time on children



A Focus Ireland study showed that own-door emergency accommodation is “more appropriate and effective in reducing the impact of homelessness, and in mitigating the long-term damage that homelessness can cause, than PEA and congregate family hubs”.<sup>[6]</sup> DHRE reports show that as of December 2021, 22% of families in emergency accommodation in the Dublin region have been there for more than two years, and 39% of families have been there for more than one year.<sup>[7]</sup> This is unacceptable.

QHSN26-QHSN31 need to be revised to include detailed mention of these priorities. Emergency accommodation should be phased out where possible in favour of public housing, where emergency accommodation is used it should be own-door where possible, and the average time spent in emergency accommodation needs to be drastically reduced.

Measures should also be in place to securely shelter pets where their owners are undergoing homelessness and allow for future reunion.

### **5.5.6 Social, Affordable Purchase and Cost Rental Housing**

QHSN32 and QHSN33 relate to social and affordable housing. These strategies should be amended to include stronger commitments to public housing, and a commitment to reduce reliance on the private market. In particular, a clear policy should be put in place to ensure there is no further leasing of social housing units from the private sector, with the potential exception of individual units in exceptional circumstances.



QHSN32 should be amended as follows. Remove “and support the realisation of public housing”, and substitute it with “support the realisation of publicly-owned housing on public land, and end social housing leasing agreements with private institutional landlords”.

In relation to Cost Rental and Affordable Housing, preference should be given to public schemes and AHB initiatives. No for profit cost-rental should be facilitated on public land. Strong weighting should be given to the goal of “sustainable, diverse communities including inter-generational urban communities” as referenced in the Affordable Housing Act.

Crucially, Affordable and Social Housing should not be conflated and separate minimum targets should be set and met in respect of each.

In any new development project on public land, there must be no erosion of the amount of social housing, or of a certain size of social housing. For example it is unacceptable that the redevelopment of O Devany gardens seems to contain less bedspaces for children than previously.

## **5.5.7 Specific Housing Typologies**

### **Apartments and Houses**

QHSN34 relates to high-quality apartment development. In the draft plan, this strategy does not recognise the peril in relying on private investors and developers to supply apartments in Dublin City.



Recent Department of Finance reports have shown that company landlords now own such large shares of rental tenancies in some Electoral Divisions of Dublin (e.g. 63% of residential tenancies in the ED of Ushers A) that they have potential price-setting power in these areas.[8] These actors also have huge dominance in the market for new apartments. For example, 'Financial Insurance' and 'Real Estate' firms accounted for over 40 percent of all new apartment purchases in 2017. These financial and company actors tend to set rents at very high, unaffordable levels. For example, average rent on Kennedy Wilson's units as of February 2021 was 147% of average Dublin rent. All these statistics taken together suggest that relying on private actors to supply apartments in Dublin city will conflict with the DCC's goal of creating affordable rental supply.

QHSN34 should therefore be amended as follows. Remove "To promote the provision of high quality apartments" and substitute it with: "To promote the provision of high quality, affordable apartments both through direct public building, AHBs and the private market".

### **Build to Rent (BTR) and Shared Accommodation**

QHSN41 relates to co-living developments. The current wording is as follows: "That there will be a general presumption against the granting of planning permission for shared accommodation/co-living in Dublin City..."

This should be substituted with: "That planning permission will not be granted for co-living in Dublin City..."

The current wording leaves a back door for future co-living applications, despite the clear message from the Minister that such developments are no longer welcome.[9]





## Student Accommodation

QHSN43 relates to student accommodation. It outlines that it is DCC policy: "To support the provision of high-quality, professionally managed and purpose-built third-level student accommodation.."

This strategy should be amended after "purpose-built" to include "affordable". There is currently a serious affordability problem with student accommodation in Dublin, with most of the stock consisting of very expensive units.[10] This has resulted in a crisis of student accommodation, with students having to live in hotels, hostels, or other short-term lets.

QHSN43 should be further amended where it says: "There will be a presumption against allowing any student accommodation development to be converted to any other use during term time". This statement is not strong enough. It should be substituted with the following: "No student accommodation development shall be converted to any other use during term time".

This is in line with recommendations that conversion of student accommodation to holiday lets should not be permitted, as outlined in a circular from the Minister following the crisis in September 2021.[11]

## Communities

QHSN4 and the policy of ensuring a "balanced community" in regeneration areas is a little ambiguous and may need expansion. Does it for example reflect the goal of "diverse and sustainable communities including intergenerational urban communities" as referenced in the Affordable Housing act. Does it reflect a



commitment to a mix of household and tenure types? families of different sizes and different generations? Does it include a balance of different kinds of employment opportunities, so that we do not, for example, see a regenerated area which primarily serves office workers and which diminishes the employment and placemaking opportunities of existing communities.

It is a real concern for example that in some areas of recent 'redevelopment' we have seen a reduction in the levels of family accommodation rather than an enhancement.

QHSN5 on Urban Consolidation should also specify the importance of ensuring that any such consolidation of 'backland', mews lanes etc. does not erode private or public rights of way, diminish urban permeability or reduce access to green space or play space for communities.

### Balanced Communities

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It is a real concern for example that in some areas of recent 'redevelopment' we have seen a reduction in the levels of family accommodation rather than an enhancement.

QHSN5 on Urban Consolidation should also specify the importance of ensuring that any such consolidation of 'backland', mews lanes etc. does not erode private or public rights of way, diminish urban permeability or reduce access to green space or play space for communities.

### **Housing, Disability and Universal Design**

The Draft Development Plan falls needs to be substantially strengthened in terms of disability housing inclusion or Universal Design. The objectives as currently stated fall short of the demographic realities and recognised needs of Dublin residents, contradict other stated objectives in the Plan, and, crucially, fail to meet the standards required under the UN Convention on the Rights of People with a Disability (UNCRPD) 12 which Ireland has ratified and which is now an obligation on all public authorities.

**QHSN25** simply reiterates commitment to implement the Strategic Plan for Housing People with a Disability 2016, however that plan predates Ireland's ratification of the UNCRPD and there should therefore be a commitment to supplementing it with additional stronger ambition and targets to reflect the stronger obligations and rights based approach under UNCRPD

While it is good that **QHSN24** recognises the importance of 'equality of opportunity' and 'individual choice'. It should be clearer that while an "appropriate range of housing" rightly includes "specific purpose-built accommodation, including assisted/supported living units, lifetime housing, and adaptation of existing



properties." It should also include proper and equitable options within new buildings and residential developments. This requires a stronger emphasis on universal design.

QHNSO10 sets an entirely inadequate target in respect of Universal Design. It is not acceptable that just "10% of dwellings in developments over 100 units" would be required to meet Universal Design standards. As the Development Plan itself notes, Census 2016 indicated that 14.7% of the population of Dublin has a disability, while the proportion of older people is 13% and rapidly rising. If we limit Universal Design obligations to 10% of what gets built we are actually planning for underrepresentation and against integration.

Moreover, Universal Design is also much better for families. It is an essential part of future proofing any home and it makes sense from a safety, environmental, inclusion and economic perspective. and it is far less costly than later adaptation or retrofitting. If we are serious about supporting sustainable urban living and creating inclusive multi generational neighbourhoods then universal design needs to become universal!

Ideally, the Development Plan should make Universal Design a standard requirement in any new developments over 50 units, with any lowering of that standard treated as an exception and subject to additional scrutiny and requirements. At an absolute minimum, there should be a requirement for universal design in 50% of dwellings in any development over 100 units.

[Childcare in housing developments:](#)



There should be an additional policy to complement DCC policy with regard to the 15 minute city (QHSN10) which is that the granting of planning permission for a large-scale residential development (LSRD) would be contingent on not less than 15% of the floor space of such a development being used for the provision of childcare or other priority services depending upon the proposed demographics of the inhabitants of such a development.

[1] BreakingNews.ie <https://www.breakingnews.ie/business/almost-e20m-in-unpaid-vacant-and-derelict-site-levies-owed-to-dublin-city-council-1240705.html>  
(<https://www.breakingnews.ie/business/almost-e20m-in-unpaid-vacant-and-derelict-site-levies-owed-to-dublin-city-council-1240705.html>)

[2] BreakingNews.ie <https://www.breakingnews.ie/ireland/dublin-city-council-acquired-25-derelict-sites-over-the-past-five-years-latest-figures-show-1257832.html>  
(<https://www.breakingnews.ie/ireland/dublin-city-council-acquired-25-derelict-sites-over-the-past-five-years-latest-figures-show-1257832.html>)

[3] Irish Times <https://www.irishtimes.com/business/economy/ireland-has-10th-highest-rate-of-vacant-homes-in-the-world-study-finds-1.4709476>  
(<https://www.irishtimes.com/business/economy/ireland-has-10th-highest-rate-of-vacant-homes-in-the-world-study-finds-1.4709476>)

[4] <https://www.irishtimes.com/news/social-affairs/travellers-devastated-as-redevelopment-of-site-in-doubt-again-1.4450793>  
(<https://www.irishtimes.com/news/social-affairs/travellers-devastated-as-redevelopment-of-site-in-doubt-again-1.4450793>)

[5] <https://www.noteworthy.ie/tough-start-pt-5b-traveller-housing-funding-5580319-Oct2021/> (<https://www.noteworthy.ie/tough-start-pt-5b-traveller-housing-funding-5580319-Oct2021/>)



[6] [https://www.focusireland.ie/wp-content/uploads/2021/11/Exploring-Own-Door-Models-of-EA-Report\\_FINAL.pdf](https://www.focusireland.ie/wp-content/uploads/2021/11/Exploring-Own-Door-Models-of-EA-Report_FINAL.pdf) ([https://www.focusireland.ie/wp-content/uploads/2021/11/Exploring-Own-Door-Models-of-EA-Report\\_FINAL.pdf](https://www.focusireland.ie/wp-content/uploads/2021/11/Exploring-Own-Door-Models-of-EA-Report_FINAL.pdf))

[7] <https://www.homelessdublin.ie/content/files/Homeless-update-22-December-2021.pdf> (<https://www.homelessdublin.ie/content/files/Homeless-update-22-December-2021.pdf>)

[8] <https://assets.gov.ie/6348/140219142846-5a166a1ec85f4237935fb5c21dd666cb.pdf> (<https://assets.gov.ie/6348/140219142846-5a166a1ec85f4237935fb5c21dd666cb.pdf>)

[9] <https://www.irishtimes.com/news/ireland/irish-news/back-door-remains-for-co-living-developements-despite-de-facto-ban-says-sf-1.4444805>  
(<https://www.irishtimes.com/news/ireland/irish-news/back-door-remains-for-co-living-developements-despite-de-facto-ban-says-sf-1.4444805>)

[10] <https://www.irishtimes.com/news/politics/oireachtas/college-students-commuting-up-to-four-hours-because-of-accommodation-1.4675074>  
(<https://www.irishtimes.com/news/politics/oireachtas/college-students-commuting-up-to-four-hours-because-of-accommodation-1.4675074>)

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(<https://www.irishtimes.com/news/politics/oireachtas/circular-on-student-housing-being-used-for-tourists-will-be-sent-to-councils-minister-1.4681916>)

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## Volume 3 - Zoning maps (/en/submission/dcc-draft-10452/observation-2)

### Chapter:

Volume 3 - Zoning maps (/en/consultation/draft-dublin-city-development-plan-2022-2028/chapter/volume-3-zoning-maps)

In relation to Map E



I would note that Grattan Hall , the apartment building in in which I live which has been here since the 80s , should be zoned as residential in line with other neighbouring apartment buildings. -This seems to be a mistake in the mapping.

I would alsdo note that there are in addition to georgian terraces it is important to recognise and protect individual goergian buildings and clusters of buildings in this area. I am concerned that the SDRA in pearse steet area does not place enough emphasis on the protection and support of existing residential communities.

I would also note with concern the intrusion of development potential zoning on a numbe of amenity spaces.

This is a concern in the area adjoining Tolka park, but even more of a concern in the two SDRAs off South Circular Road, the sports field and playgrounds within these should be marked as amenity.

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## Chapter 15: Development standards (/en/submission/dcc-draft-10452/observation-3)

### Chapter:

Chapter 15: Development standards (/en/consultation/draft-dublin-city-development-plan-2022-2028/chapter/chapter-15-development-standards)

### Chapter 15:

#### Offices

All offices are not the same and should not be treated as such in the Development Plan. A solicitors office or small company office is not, for example, the same as a large open plan commercial office building. We have a large number of such speculative buildings in the city at the moment, many of which are currently vacant.

The fact that 'civic offices' are categorised separately in the development plan and associated zoning makes it clear that it is both possible and useful to distinguish between different categories of office, given their different impacts and roles.



I believe that it would be useful to create a separate category of “large scale commercial office development” in relation to commercial offices over a certain size e.g greater than 600 sqm. This would allow for greater nuance in zoning , e.g Z3 and could include “offices, excluding large scale commercial office developments” in the permissible development and move the “large scale commercial office developments” to the ‘may be considered’ category where they will receive more scrutiny, as is appropriate at a time of over saturation.

In 15.14.4, there should be an obligation to provide an impact assessment in respect of how the proposed development would impact other buildings in close proximity.

#### Embodied energy:

- “The most sustainable building is the one that already exists”
- It is good to see some reference in the importance of minimising the release of ‘embodied energy’ in section 15.7.1 However the provisions in this section should be strengthened in a few ways. Within each demolition justification report, there should be a requirement that the developer has demonstrated that all options other than demolition, such as refurbishment, extension or retrofitting, have been properly considered and are not possible. Each planning application which includes a proposal for demolition should include an estimate of the amount of embodied energy and carbon equivalent emissions which might be released through that demolition and that amount should be included when calculating whether a building meets sustainability criteria.
- 

#### Trees:

- In 15.6.10, it should be stated as a policy that tree removals would not occur on weekend days. Furthermore, an assessment should be undertaken as to how much carbon the tree could have been reasonably stored over a set time period.

#### Play Infrastructure:





- In 15.8.8, it should be noted that where possible, intensive forms of surveillance and policing should not be used and passive surveillance methods, such as those used in Weaver Park should be employed.
- It should also be the case that DCC is not just supporting universal design, but ensuring that all play infrastructure in the city has universally accessible infrastructure. Universal design is not an aspiration but an obligation under the United Nations Convention on the Rights of Persons with a Disability.#

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## Chapter 6: City economy and enterprise (/en/submission/dcc-draft-10452/observation-4)

### Chapter:

Chapter 6: City economy and enterprise (/en/consultation/draft-dublin-city-development-plan-2022-2028/chapter/chapter-6-city-economy-and-enterprise)

Far too much emphasis in this chapter in placed on offices and tech start ups , and a far more diverse range of employment oportunities should be supported including light industrial and community weakth building projects.

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## Chapter 7: The city centre, urban villages and retail (/en/submission/dcc-draft-10452/observation-5)

### Chapter:

Chapter 7: The city centre, urban villages and re... (/en/consultation/draft-dublin-city-development-plan-2022-2028/chapter/chapter-7-city-centre-urban-villages-and-retail)

jj

## Information

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**Consultation:**

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