

DCC
Planning Dept.
Civic Offices
Wood Quay
Dublin 8



31 Jan 2022

Submission /observations on Draft Dublin City Development Plan 2022-2028.

Contradictions.

Chapter 3 amongst others makes reference a number of times to proposals for development (e.g. by Docklands) of the Poolbeg peninsula under a variety of at present non existent addresses (e.g. Pembroke Quarter) and also for district heating and transport which are in contradiction of objectives and policies for ecological and environmental protection of EU and Unesco designated areas and species.

SEA and AA.

Reference is also made to the proposed Plan having been subjected to SEA and AA and the then uncompleted, unpublished update of the Biodiversity Action Plan report for completion in 2021. That report can now be downloaded from the internet. It would seem that the SEA and AA did not include assessment of information in that report.

Habitats and ecosystems.

The present Draft Plan still speaks of monitoring and possibly mitigating effects of private, semi private and public proposals. This provides no protection for or restoration of these areas, habitats and ecosystems, which are of local, national, international and global import.

Sustainability.

At the time when the Proposed Draft Dublin Development Plan was being produced there were also plans for the provision of an additional Waste water treatment plant to take the pressure off Ringsend which is highly overloaded, leading to ongoing frequent episodes of pollution in Dublin Bay and surrounding lands. That additional facility is not now to be provided.

Previous successive development plans have been controlled, influenced and continually promoted by successive governments, as is this present draft, on assumptions that some form of coast road/eastern by-pass and road access to lands reclaimed with hazardous wastes together with a number of bridges will be provided to facilitate development on south Dublin Bay beaches, foreshores and coastlines. (It is unclear what monetary contribution is to come from all Ireland taxpayers, sought from the EU or from venture capital.)

There is no consideration of the possible natural ecological and other environmental effects of associated proposed or "found to be needed" infrastructure on human beings and wildlife, including plankton.

Coastal squeeze.

This can occur either indirectly as a result of climate change and tidal effects or from direct human interference. Effect of proposals for additional infilling of south side beaches (Sandymount and Merrion strands) under the guise of flood protection and provision of cycleways will I believe not solely be limited to the direct loss of those immediate areas of natural habitat and biodiversity but could lead to further coastal squeeze, plus additional flood problems elsewhere due to back up of rivers and drains.

Light.

Other species in addition to bats can are vulnerable to light pollution.

The above are just some of the comments that occur to me in regard to the proposed DCDP .

Yours sincerely,

Lorna Kelly

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