

Richview Residents Association

Merton Road, Cowper Road, Temple Gardens, Temple Villas, Palmerston Park, Palmerston Lane, Richview Park, Richmond Avenue South, Temple Road.



19th February 2021

Re: Pre-Draft Public Consultation Strategic Issues Paper – Dublin City Development Plan 2022-2028.

Dear Sir/Madam,

The Dublin City Development Plan 2022-2028 for a compact, quality, green, well connected city is welcome. A clear strategy and vision for the city is to be developed in a sustainable manner, with the central historic core as a living city, is essential.

It would be useful for interested parties to have information on the review of industrial areas to be rezoned and key urban projects under the LIHAF and URDF included in the consultation website.

Regarding Bus Connects and Metro, it is regrettable that these do not appear to be working together to provide the best co-ordinated solution for transport. The south side Luas from Charlemont (and preferably from Stephen's Green) must remain as it exists now. Additional Metro routes south east and west should be urgently investigated since these would take commuters off the roads and allow all the urban villages, such as Rathgar, Terenure and Rathmines to be centres of activity for adjacent communities to be accessed on foot.

Underutilised lands in the Liberties and North East inner city should not have too many Co Living/Student housing/Hotel developments which lead to a transient population which does not build communities.

We welcome the consultation process and request that the following comments be taken into account in the preparation of the Dublin City Development plan 2022-2028.

THEME 1: URBAN FORM, HEIGHT and DENSITY

It is vital to recognise that Historic Urban Centres such as Dublin with its medieval, Georgian, Victorian and modern heritage is an irreplaceable historical, social, cultural and economic asset which should not be compromised by ill-conceived, erratically located, high

buildings which take no cognisance of the receiving environment. Blanket Ministerial Height Guidelines only serve developer led projects and not residents.

The character and quality of the urban core and surrounding districts of the Dublin City Council area must be safeguarded. Available vacant sites outside this area such as institutional lands can have higher density and provide public open spaces and sporting facilities. Part of the problem when calculating the density of Dublin is that the surrounding 2 storey suburban areas, where densities are low, are often included.

Ministerial Guidelines such as under Section 28 (1C) of the Planning and Development Act 2000 (as amended) override democratically agreed local development plans and local area plans. This is seriously detrimental to our built environment and is a disincentive to public participation in the proposed DCC Development Plan 2022-2028.

While the Building Height Guidelines refer to sensitive historic environments, it would appear that An Bord Pleanála is not giving proper consideration to the receiving environment of many Strategic Housing Developments. See attached **Appendix C: Impact of Section 28 Guidelines**. Hence Richview Residents Association has prepared with other residents associations, under an umbrella alliance called the Dublin Democratic Planning Alliance, the attached **Appendix A**, which has been sent to all Government Ministers, Senators and Dublin City Councillors. This initiative is supported by over 30 Residents Associations (**Appendix B**) to advocate for the adoption of an appropriate model for housing and planning in Dublin.

There is much confusion that high rise will provide greater housing when in fact high densities can be achieved with low rise buildings. **See Appendix D.**

Georgian Dublin is an example of high density at 4 – 5 storeys providing 165 – 170 dwellings per hectare.

Oxmonstown Road Stoneybatter with a height of 2 stories provides 165 dwellings per hectare.

High rise buildings are more costly to construct and maintain and take longer to build.

To quote Conor Skehan the former Chairman of the Government Housing Agency,

'It's a very common mistake to confuse high-rise with high density. High-rise makes very little contribution to density. The benefit is very much for the housing developer: they benefit enormously from a high-rise building, the public doesn't.'

The location of significantly higher buildings must have a basis in public acceptability via a transparent process of analysis and democratically approved Local Area Plans and the proposed Development Plan.

The term 'Landmark building' is a dangerous proposal outside a Local Area Plan. Every developer wants their office or apartment block to be a Landmark building. Traditionally Landmark buildings were usually Public buildings, churches, town hall etc. and hence made civic sense. They should not be for the aggrandisement of developers' egos (and pockets)!

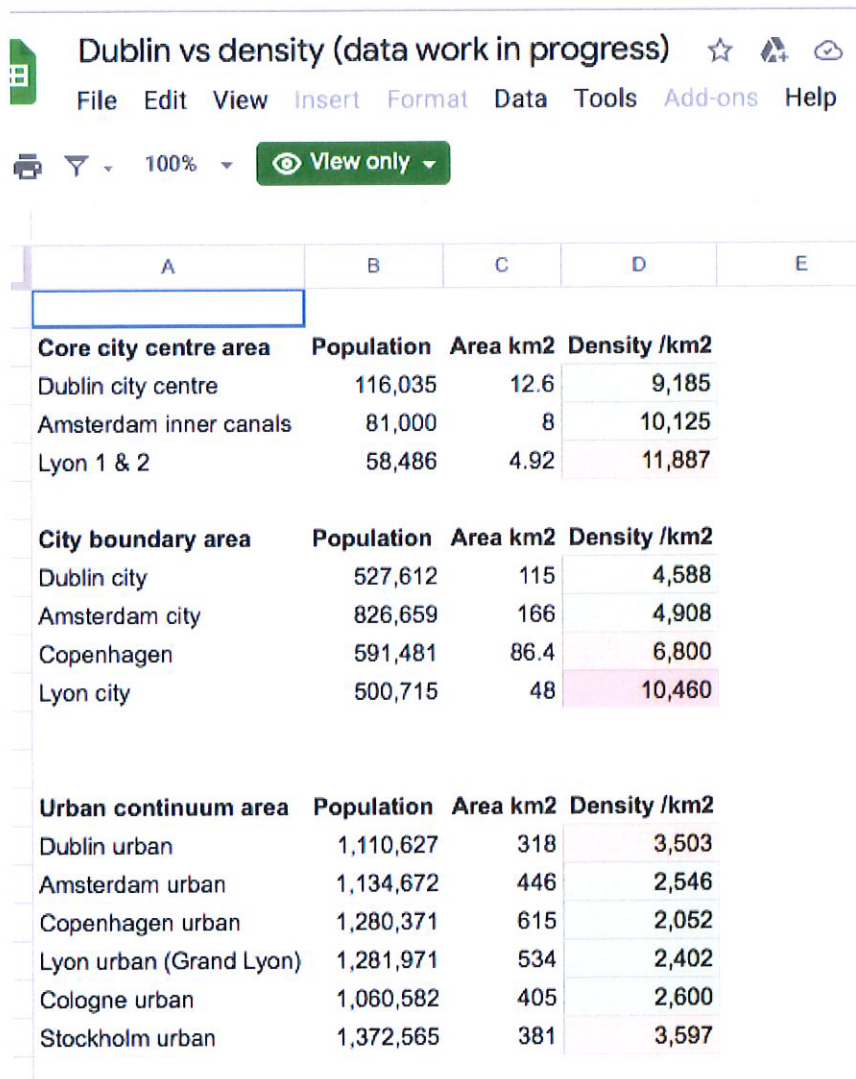
DENSITY

Density is calculated in 2 different ways

- 1 Population density which measures the number of people per square kilometre
- 2 Residential density which measures the number of dwellings per hectare.
(There are 100 hectares in 1 square kilometre)

The confusion and misinformation arises when the boundaries of areas measured are incorrectly compared as in the Ministerial Height Guidelines.

The data below shows that Dublin City Centre and City Boundary area both compare in density with Amsterdam, a city lauded as one Dublin should be aspire to emulate.

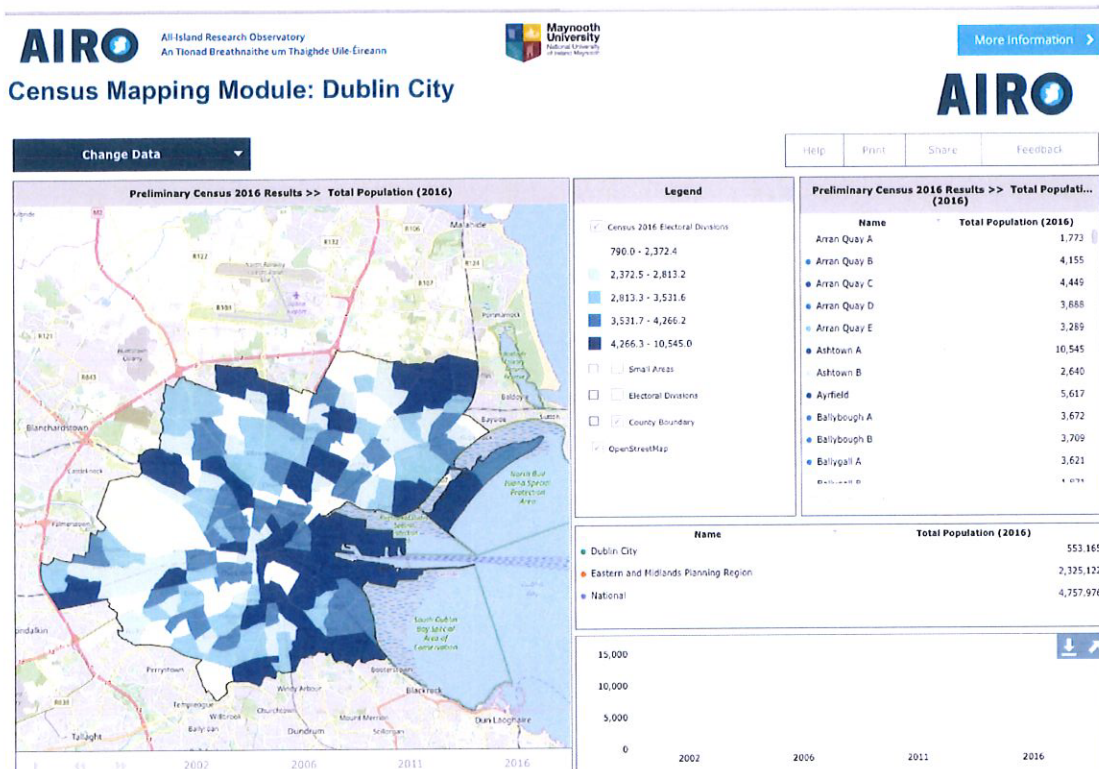


	A	B	C	D	E
Core city centre area	Population	Area km2	Density /km2		
Dublin city centre	116,035	12.6	9,185		
Amsterdam inner canals	81,000	8	10,125		
Lyon 1 & 2	58,486	4.92	11,887		
City boundary area	Population	Area km2	Density /km2		
Dublin city	527,612	115	4,588		
Amsterdam city	826,659	166	4,908		
Copenhagen	591,481	86.4	6,800		
Lyon city	500,715	48	10,460		
Urban continuum area	Population	Area km2	Density /km2		
Dublin urban	1,110,627	318	3,503		
Amsterdam urban	1,134,672	446	2,546		
Copenhagen urban	1,280,371	615	2,052		
Lyon urban (Grand Lyon)	1,281,971	534	2,402		
Cologne urban	1,060,582	405	2,600		
Stockholm urban	1,372,565	381	3,597		

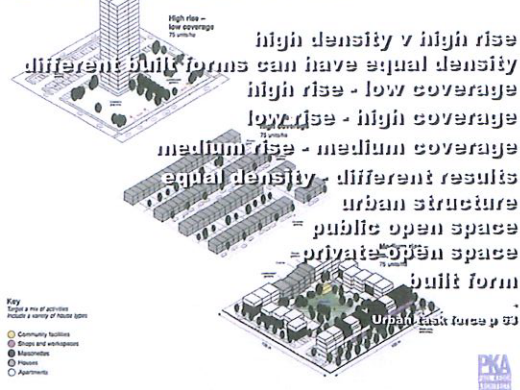
Is Dublin A Low Density City? Irishcycle.com

<https://irishcycle.com/2015/11/03/is-dublin-a-low-density-city/>

As can be seen from the AIRO Census below, several electoral areas in Dublin have densities of 4,266 – 10,545 people per hectare. (NOT dwellings per hectare)



URBAN DENSITY - MISCONCEPTIONS



Dublin City Council Maximising the City's Potential: A Strategy for intensification and Height Existing density examples.

The cost modelling in connection with the above study identifies heights of up to 6 stories as being optimal from a viability standpoint for affordable apartment buildings. The document also identifies densities of 165 units/hectare in Georgian areas with 4 stories above street level. In a recent interview with Pat Kenny on Newstalk, Dublin City Planner John O'Hara suggested that there is a need to move from the suburban density of 30 units per hectare to 60 units per hectare. This density and much more already exists in many parts of Dublin city. The Players Wills, Build to Rent proposal in Dublin 8, with a 19 storey block has a density of 239 units per hectare which is almost 4 times what Mr O'Hara suggested!!

The *'Review of Delivery Costs and Viability of Affordable Residential Developments'* by the Department of Housing, Planning and Local Government (April 2018) states at Section 6.6.3:

'The cost modelling undertaken in connection with this current study identifies heights of up to 6 storeys as being the optimal height from a viability perspective for affordable apartment buildings.'

The same study also makes it very clear that high densities do not require high buildings. At Section 6.6.3 it states:

'While the prevention of urban sprawl is a positive objective, the NESC study and diagram below illustrate that for a set plot ratio and site size, the high rise building does not provide any more dwellings than a perimeter block arrangement of three or four storeys.'

It is patently obvious that to achieve significant increases in intensity of development in our towns and cities it is NOT necessary to have increased height.

Reflecting the above comments, our recommendations in relation to the proposed Development Plan are the following:

- 1 **RECOMMENDATION** Remove the Ministerial Urban Development and Building Height Guidelines for Planning Authorities 2018 and remove them also from the Project Ireland 2040, process. While this is outside the remit of the development plan process, Councillors should consult with Government on this issue as the development plan process is becoming redundant when it is being superseded by Ministerial Height Guidelines.
- 2 **RECOMMENDATION** The maximum height in Georgian Dublin should be 6 stories and 18 metres.
- 3 **RECOMMENDATION** In the DCC Development Plan 2016-2022 the height threshold for 'low Rise' was almost doubled from 15m to 28 m. This approximates to 8 stories which in normal language would not be considered 'low rise'.
'mid-rise was described as up to 50 m.
' high- rise was defined as above 50 m.

4 RECOMMENDATION

The height thresholds in the new Development Plan should revert to the following

Low Rise 15 m

Mid Rise & High Rise should be re-evaluated depending on the receiving environment..

The locations for tall buildings should be to the East and West of the city. Landmark buildings should not include office or apartment blocks but rather should be civic buildings.

THEME 2: STRATEGIC HOUSING DEVELOPMENT/COST OF PART V UNITS.

While this topic is outside of the scope of the Development Plan it is one which must be given consideration by Councillors. ¹

The Strategic Housing Development (SHD) process of developer-led ministerial directives and planning decisions made solely by An Bord Pleanala is anti-social and has a fundamental democratic deficit. This system does not take account of existing communities and local concerns about the destruction of the quality of the receiving area. It is contrary to the Aarhus Convention, an international environmental convention which established three fundamental principles:

- access to information,
- public participation in decision making and
- access to justice.

On review of the 250 decisions already made by An Bord Pleanala on SHD applications, it is evident that many of the buildings granted permission will irreversibly damage the areas in which they are located in social, spatial and visual terms and will not provide affordable housing for the population.

Appendix G attached indicates the SHDs within the M50.

EXAMPLE OF SHD Development Sherrif Street

'Glenveagh to charge council up to €791,500 for family apartments

Housebuilder expects to get €33.4m for 71 social housing units at 702-unit city centre development

Tue, Jan 12, 2021, 18:38

Gordon Deegan'

Housebuilder Glenveagh expects to charge Dublin City Council €33.44 million for 71 social housing units at a major development on Sheriff Street.

¹ UCD de-democratising the Irish planning system M Lennon R Waldron.
<https://researchrepository.ucd.ie/handle/10197/9683>



If Dublin City Council built affordable housing they could house twice the amount of residents as by purchasing (Part V) units costing €791,531 per unit.

The Eglinton, Dublin 6, SHD of apartments in a development which breaches the current Development Plan has Dublin City Council purchasing Part V apartments at a cost of 469,177 euro for a 1-bedroom unit and 762,916 euro for a 2-bedroom unit.

See Appendix F attached.

Accordingly, the following are our recommendations under this heading:

- 1 RECOMMENDATION** Again while this is outside the remit of Dublin City Councillors, the issue of Strategic Housing Development should be taken up with Government and should also be removed from the Project Ireland 2040. We suggest that this process will distort the entire planning process in Dublin and nationwide. At these costs, the Government could provide twice the amount of accommodation.
- 2 RECOMMENDATION** The maximum height in Georgian Dublin should be 6 stories / 18 metres.
- 3 RECOMMENDATION** Use the Maynooth University, All island Research Observatory & other evidence-based information to assess existing and proposed Dublin population density per electoral area and the capacity within any receiving environment for such development.
- 4 RECOMMENDATION** Asses the Part V /10% of new build housing units which Dublin City Council is committed to buy from private developers and whether this is good value and will provide for much needed housing in Dublin.

THEME 3: QUALITY HOUSING and SUSTAINABLE NEIGHBOURHOODS

Quality Housing, Healthy Place-making and Urban Design.

Covid 19 has shown the importance of public spaces and Parks. Any new housing development should provide healthy place making and urban design with an increased number of parks or open spaces. Covid has shown that existing parks can hardly cope with the increased usage. In densification of any area the provision of additional open space/sporting facilities must be of paramount importance, especially as more apartments are built. New apartment standards must be increased to provide additional space for working at home and larger balconies in tandem with additional ground level open space. In periods of Lockdown the importance of local facilities within a 5 km area has highlighted these issues.

Owner occupied housing which is affordable must be provided by Dublin City Council for purchase. With over 20 Build to Rent SHDs in progress, houses available for purchase at a reasonable cost are becoming increasingly difficult for young people. This was a major talking point in the last election and promises to be even more so in the next one.

Housing Tenure & Mix

While student accommodation may be required, it should be continuously reassessed in light of demand and suitability of location. Would it not be more sustainable to provide normal apartment type accommodation which could be used in the long term for residential use? Thankfully Co Living, a substandard type of accommodation where the Living Room/Bedroom and shower room are the size of a disabled parking bay has been removed by the Minister. Not before a rush of last minute applications were lodged. This typology leads to a large distortion in land value and is not a long term sustainable form of accommodation. Encouraging people to use micro wave food is not a healthy option. It is also a transient type of resident which does not build communities. The receiving environment has had nothing added. While areas such as the Liberties have sites for development, too many Co Living, Student Accommodation and Hotel developments have been allowed. There must be a coordinated continuous assessment by Dublin City Council as to whether there is an oversaturation of a single typology in any given area. An urgent Housing Need and Demand Assessment should be done perhaps for each electoral district in Dublin and planning applications granted only if they satisfy the HN&DA.

Planning for a Post Covid 19 Environment.

Covid 19 has highlighted the importance of exercise and mental health. This highlights again the issues regarding shared accommodation and the need to raise apartment standards to be sustainable in the long term and to contribute to the public realm.

Build to Rent & Reits

The boom bust in the property market stems from the increasingly global nature of real estate investment by switching capital from investments in the productive economy into speculative investments in the built environment. The introduction of Real Estate Investment Trusts (REITs) as part of a wider effort to deleverage the country's failed banking sector and attract

capital into the property market includes a new institutional asset class in the rental sector. This acquisition of large portfolios of distressed assets has enabled investors acquire enormous control over local property markets, as planning over a key economic sector is removed from public control. REITs are typically exempt from tax on rental income and capital gains subject to certain restrictions. Recognising the lucrative opportunity created by the devaluation in Irish property and the concentration of assets in NAMA, a consortium of highly-influential property sector stakeholders formed a lobbying group in 2011 known as the 'Irish REITs Forum' to promote an Irish system of Real Estate Investment Trusts. These investments are targeted toward higher and middle-income tenants, thereby reducing the availability of affordable housing for lower-income households. The lack of social housing provision under successive austerity budgets, is leading to increased homelessness. Twenty thousand households are currently on Dublin's social housing waiting list, yet just 604 social units were under construction in 2016. Government socialised the national debt after the 2008 crash. With the introduction of REITs, this dispossession has ensured that any gains arising out of a recovering market are to be syphoned off to global investors rather than retained within the domestic economy. The active asset management practices of REITs and other investors have resulted in dramatically rising rents, which have fed into a new crisis in affordable housing supply and generated concerns about Ireland's broader economic competitiveness. Rising asset values and land prices have fed into rising house prices. A further avenue for REIT expansion is the provision of social and affordable housing. An understanding of the tactics by which REITs are distorting the market and the planning system is urgently needed. Attached **Appendix G** shows a Map of 75 SHDs in Dublin with 20 of those being Build to Rent.

The following are our recommendations in relation to this Theme:

1 RECOMMENDATION

A vision for each area is required. Available sites must not be left to developers to decide what type of development suits them but rather what DCC requires based on evidence as to what infrastructure and additional public realm and open space is required.

2 RECOMMENDATION

The Shared Living typology should be completely removed and sustainable residential accommodation to high standards which serves any resident should only be considered.

We request that the above be given full consideration for inclusion in the Development Plan 2022-2028.

Yours sincerely

Marion Masterson
Richview Residents Association