

RICHVIEW RESIDENTS ASSOCIATION

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



12th FEBRUARY 2022

Development Plan 2022-2028
Dublin City Council
Civic Offices
Wood Quay
Dublin 8



**Re: Submission on the Dublin City Development Plan 2022-2028
Written Statement 16.09.2021**

Dear Sir/Madam,

Richview Residents Association welcomes the opportunity to contribute to Dublin City Development Plan 2022-2028.

We made a submission on the Pre-Draft Consultation Strategic Issues Paper – Dublin City Development Plan 2022-2028, in February 2021. We attach a copy of that submission.

To assist citizens to engage with making submissions on the Development Plan 2022-2028 volumes, there should be tracked changes on all 17 chapters and the Appendices.

Richview Residents Association supports the intent of the Development plan regarding the following;

1. Control of Heights.
2. Limiting developments which are all Build To Rent.
3. Limiting the number of BTR developments in any area.
4. Improving spatial standards and that 40% of BTR developments must have the best standards. The Urban Development and Building Height Guidelines 2018 should revert to being Guidelines without Specific Planning Policy Requirements. To include the SPPRs distorts the proper planning and development of the city. These and other SPPRs introduced in a piecemeal fashion to help the Housing crisis are being exploited by Developers to maximise site values to the detriment of both proper affordable housing and the appropriate coherence and development of the city.

RECOMMENDATION:

BTR developments with lower standards should be removed entirely especially from Z12 and Z15 zonings.

We support the strategic vision noted in Volume 1, Chapter 1, Page 4.

“Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, and vibrant culture. It will also have a diverse, green, and innovation-based economy. Dublin will be a socially inclusive city of urban neighbourhoods.”

CHAPTER 1: STRATEGIC CONTEXT AND VISION

Section 1.2 Strategic Approach

Areas of regeneration need to be planned properly with coherent heights which do not damage the Georgian, Victorian or existing built heritage. It is unacceptable that developer led, site driven incongruous development such as for example the 9 storey hotel proposed around the Cobblestone pub should be submitted. Similarly the Eglinton Road SHD at 13 stories in Donnybrook is excessive where the permissible building height is 16 meters (5 stories) under the Dublin City Development Plan 2016-2022.

This is due to the Specific Policy Planning requirements which make a mockery of town planning. Compact growth can be achieved without the destruction of the city.

RECOMMENDATION:

Specific Planning Policy Requirements must be removed.

CHAPTER 2: CORE STRATEGY

It is interesting to note that there is sufficient zoned land to accommodate 50,000 housing units between 2022 and 2028 which is 10,000 units above the national and regional planning policy. This diverges considerably from the HDNA estimated housing need by Tenure 2023-2028 of 27,219 over the same period. Table 23 HDNA, Volume 2, Appendices, page 38.

It would be valuable to know what density it requires in Units per Hectare to achieve either 27,219 or the 50,000 housing units. Also what areas of the city have been considered to accommodate these housing units. Monitoring and evaluating measures should be continually updated unlike what has happened in recent years where first Co Living and now Build To Rent have taken over development.

RECOMMENDATION:

Remove BTR typology and reduced apartment standards .

CHAPTER 3: CLIMATE ACTION

Compact growth can be achieved with low rise development of even 3 stories which is less expensive to build rather than high rise apartments which are expensive to both build and maintain. Since development is site driven by developers it behoves Dublin City Council to anticipate these developments and to target future educational requirements and green space networks and ecosystem services in advance of sales of such sites.

RECOMMENDATION:

Advance Local Area Plans to assess both Housing, Social, Transport and Green infrastructural requirements.

Chapter 4: SHAPE AND STRUCTURE OF THE CITY

Infill sites should be developed so that they do not damage the receiving environment in terms of height. It should be mandatory that in increasing the population, additional open space, schools and sports facilities should also be provided. Are details of the new policy to manage height based on locational and performance criteria available?

We welcome the Strategic Approach vision for the following:

“The Creation and nurturing of sustainable neighbourhoods and healthy communities in line with the principle of the 15 minute city.”

“The promotion of development that enhances and nurtures our natural heritage assets, which improves biodiversity and which develops a green infrastructure network for recreation and amenity.”

“To encourage development that enhances integrates and respects the city’s heritage and cultural assets and that is sensitive to the setting and context of buildings and features of conservation and archaeological merit.”

RECOMMENDATION:

Building heights in the city should be compatible with the Georgian height unless in the Docklands. However heights in this area should also have some uniformity.

POLICY SC10, VOLUME 1, URBAN DENSITY, Volume 1, Page 145.

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

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!! Other recent proposals are even higher again.

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."

We refer also to Shay Clery Architects open source article by Director John Dobbin

"Would you like to resolve the housing crisis? "

https://www.linkedin.com/posts/john-dobbin-a295614b_activity-6823161239062028289-x8mc

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 regarding the term 'Landmark building' is that 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. Erratic high rise buildings all over the city must be avoided.

RECOMMENDATION:

Remove the terms 'Landmark building' and 'Visual Marker'

TABLE 1: DENSITY RANGES. VOLUME 2, Appendices.

Recommendation: Change as in revised Table 1 below.

Location	Net Density Range (units per ha)
City Centre	75 - 200
Canal Belt	75 - 150
SDRA	100-200/250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key urban Village	60-100
Former Z6	75 - 120
Outer Suburbs	60-100

CHAPTER 5: QUALITY HOUSING AND SUSTAINABLE NEIGHBOURHOODS

It is welcome to hear that housing which is sustainable for citizens throughout their lives is fundamental. One bed units do not fulfil this aspiration. Young people may need a 2nd bedroom if working from home or to start a family. Older people may need a live in carer. Regrettably the type of development granted under Strategic Housing Development and Build To Rent schemes does not fulfil this requirement. These have been granted permission on a site by site basis rather than being part of a planned locality within a quality urban context. In addition they are very expensive rather than affordable.

RECOMMENDATION;

Dublin City Council Planning Department should be properly funded to divide the city into localities where available development sites within the locality are examined and the social, educational, transport, sport and green infrastructure requirements for the future population are planned for before large developments take place or institutional lands are sold off.

CHAPTER 7: THE CITY CENTRE, URBAN VILLAGES and RETAIL.

The Development plan is not specific enough in setting out criteria governing height and density in these areas. Higher buildings should not be allowed which damage this urban setting, its views and prospects.

RECOMMENDATION:

Ranelagh Village should be designated as an Architectural Conservation area with its Victorian and Edwardian streetscape. It could be grouped with Donnybrook.

Key Urban Villages

The KDC of Rathmines should be more defined on Map H. It should be limited to the central retail area. Rathmines should not be open to increased heights as can be interpreted through the SPPRs in the Urban Development and Building Height Guidelines. Rathmines is a historic district with most of the houses on Rathmines Road Lower being Protected Structures. The Conservation and Urban Regeneration Study 2005 by Dublin City Council must be invoked. There must be specific protections for important views of the Church dome and the town hall clock tower.

RECOMMENDATION:

New buildings should not breach the existing Georgian height. A Retail Study should be carried out for Rathmines to inform future development.

RECOMMENDATION:

The Iveagh Market and DCC Wholesale Fruit and Vegetable Market should be made operational. They would bring vibrancy to the areas in which they are located. Both are also historic buildings worthy of restoration.

Section 5.3, KEY URBAN VILLAGES and NEIGHBOURHOOD CENTRES.

We support the following;

Page 250 CCUV12 Shopfront Design

Page 261 CCUV011

Page 261 CCUV012 These Objectives should be made **Policies** of Dublin City Council regarding the Victorian Fruit and Vegetable Market and the Iveagh Market.

Policy CCUV45 Removal of Unauthorised Advertisements

RECOMMENDATION:

CCUV020 should be made a Policy- Audit of Redundant Signage.

CHAPTER 8: SUSTAINABLE MOVEMENT and TRANSPORT

8.5.2 Effective Integration of Land Use and Transportation

"The plan encourages higher density development along public transport routes"

Blanket statements such as that above are a crude instrument as Busconnects, Metro and Luas still have a periphery to centre of Dublin structure. People at the periphery are able to access these modes of transport but they are already full shortly after leaving the outskirts of Dublin.

RECOMMENDATION

Re-evaluate the above statement.

CHAPTER 9: SUSTAINABLE ENVIRONMENTAL INFRASTRUCTURE and FLOOD RISK

RECOMMENDATION:

Upgrade sewage disposal to avoid raw sewage entering the sea at Monkstown and Dublin Bay.

CHAPTER 10: GREEN INFRASTRUCTURE and RECREATION

We agree with the three paragraphs of aspirations. However there appears to be no assessment per locality as to how to provide more parks and sports pitches to achieve these aims. Institutional lands will in all probability be developed as for example the Jesuit lands at **Milltown Park**, Dublin 6. The 25% required setting aside of open space in that case could have achieved a much needed Sports Pitch for the Ranelagh/Rathmines area. However the 25% open space is scattered across the proposed site which means it will not be used as public open space. This is contrary to Policy G17.

To provide proper environmental/ecological resilience green areas should be linked to provide continuity. For example **Scully's Field** from Clonskeagh Road along the Dodder should not be developed but should provide an extension to Dodder Network as stated in Policies G11, G12 and G13.

Donore Avenue. The future development of the municipal playing facility at is welcome however, the simple fact is this still will not be enough.

Liberties. There is very little public open green space in the **Liberties**, considering how dense this part of the city is and considering also the significant number of new high density residential schemes under construction which will bring thousands of new residents and

visitors to the area - from Grand Canal Harbour through the Guinness lands to Newmarket Square across to Player Wills, it is estimated that an additional at least 6,000 residential units will be built.

Green Space per person in the area is significantly below the EU average - the South West Inner City is one of the most paved areas in the city - there are ten schools in the area, most of which have limited or no sporting/recreational facilities - a recreational/sporting green amenity in this location would be an important amenity for local schools, workers, sports club teams, residents present and future and tourists.

It is an objective of the Draft Dublin City Development Plan to: ensure equality of access for all citizens to the public parks and open spaces in Dublin City and to promote more open space with increased accessibility and passive surveillance where feasible. In this regard, a city wide range of 2.5ha to 3.6ha of parks per 1,000 population benchmark for green/recreational space as set out in the 2019 Parks Strategy (or as updated) shall be a policy goal and quality standard (Chapter 10, Draft Development Plan 2022 - 2028, page 369).

To ensure sufficient land is available for sports and recreational facilities in the inner city area and to look to the sustainable development of the area, we support the proposal to designate these lands as zoned for green infrastructure and sports/recreational use. We understand that land in the inner city is at a premium and so this site presents a unique opportunity to develop amenities for the community which are much needed in addition to the provision of housing and depot services as required by Dublin City Council. We support the original proposal on behalf of Sporting Liberties which proposes a scheme for the 7 acre site providing for 340 homes, a large open multi sports all weather playing pitch AND depot services for the Council.

Young people are increasingly exposed to and challenged by social and economic issues which might impact on their educational outcomes and life chances. Sport has long been acknowledged as a key factor in supporting young people to learn life and interpersonal skills and to provide opportunities to engage in positive and life enhancing activities in their communities. All young people, those living here now and those that will be living here in the future, as well as all residents, workers and visitors to the area should have access to the kind of amenities that will support our inner city communities and neighbourhoods to develop sustainably and to thrive. In an era where critical actions must be taken to address issues of climate change, it is imperative that our cities are greened and that we can avail of sporting and recreational amenities within the inner city.

RECOMMENDATION:

Sandford Living development at Milltown Park should provide public sports facilities.

Scully's Field should become part of the Dodder Network.

Support Sporting Liberties playing pitch.

The Dublin Tree Strategy 2016-2020 was a welcome document. However despite requests to communicate about our trees in Palmerston Park no action was taken. In all of Dublin there are only 6 Tree Protection Orders. This speaks for itself as to the lack of progress.

RECOMMENDATION:

Progress the aspirations of the Dublin tree strategy.

CHAPTER 11: BUILT HERITAGE and ARCHAEOLOGY

Unfortunately the Government **Specific Planning Policy Requirements** (SPPRs) in particular the Urban Development and Building Height Guidelines which are mandatory supersede the Development Plan. As random sites are bought by developers who all seek to use these SPPRs it leaves our built heritage in a perilous position.

While there have been 51 additions to the RPS it is regrettable that there have been 129 deletions.

More funding should be given to speed up The Record of Protected Structures which has many inconsistencies. For example the houses on Cowper Road, East of the Milltown Path are not Protected even though they are in many cases identical to houses on Temple Gardens which are Protected Structures.

BHAO1 *To continue to maintain and proactively manage the Buildings at Risk Register of Protected Structures that are considered to be endangered or have the potential to become endangered through neglect, decay, damage and harm.*

RECOMMENDATION:

Objective BHAO1, above should become a Policy.

In the Richview Residents Association area No 20 Palmerston Park, a Protected Structure has been empty and deteriorating since 2007. 15 years!! The large mews to the rear is also vacant since 2007. This despite having a planning approval. This is unacceptable.

BHAO2 To identify and designate further Architectural Conservation Areas such as Ranelagh and Donnybrook.

RECOMMENDATION:

Objective BHAO2, above should become a Policy.

Appendix

2.2 Housing Strategy Guiding principles, page 3.

This states

“Providing a variety of housing typologies and tenures that are adaptable, flexible, and meet changing family needs over the family lifecycle and throughout peoples’ lives.”

This is laudable but in Section 3, Housing Strategy Context 3.2 the ‘Sustainable Urban Housing, Design Standards for new apartments Guidelines for Planning Authorities (2018) SPPR 1 provides that new apartment developments may include up to 50% one-bedroom or studio type units.

Annex 2 to Appendix 1 the Dublin City Housing Supply Target Methodology.

Table 2.13 Demand by Unit Type in Dublin City Page 163, Dublin 1 sees a reduction in all household composition save for 2 person households.

Is it not a self-fulfilling prophesy in the city that if only Build To Rent, 1-bedroom apartments are built we will not have a living city with families?

CHAPTER 15, DEVELOPMENT STANDARDS

TABLE 15-4 Public Open Space Requirements for Residential Development.

Land use /Zoning Requirement (minimum)

We agree that Z12 and Z15 have a requirement of 25%

SECTION 15.9.17 Separation Distances (Apartments)

“Traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Separation distances between buildings will be assessed on a case by case basis. In all instances where the minimum separation distances are not met, each development will be assessed on a case by case basis having regard to the specific site constraints and the ability to comply with other standards set out within this chapter in terms of residential quality and amenity.”

While the DCC Development Plan provides guidance regarding the appropriate separations distances, these are clearly intended for opposing two storey dwellings and do not prevent overlooking or loss of privacy from high rise apartments with balconies towards each other or adjacent properties. The separation of 22m is the same provision as that for 2-storey dwellings in Section 15.11.4 Separation Distances (Houses), p.709.

RECOMMENDATION:

We would request the Council to consider increasing the setback distances to cater for the recent increase of high rise, high density development which has a significant impact on the visual privacy of adjacent existing housing and opposing blocks.

The BER document **Site Layout Planning for Daylight and Sunlight- A Guide to Good Practice**, confirms that while separation distances of 18-35m are generally appropriate between opposing windows for good levels of daylight, and up to 90m is required for complete visual privacy. We would request that this guidance is incorporated into the **Dublin City Council Development Plan**.

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

Yours sincerely,



Marion Masterson
Richview Residents Association