

**Submission on the Dublin City Development Plan**

Development Plan Team,  
Planning and Property Development Department,  
Dublin City Council,  
Wood Quay, Dublin 8

Final Date for Submission **4.30pm on 14th February 2022.**



Submitted on behalf of  
**Charlotte Sheridan / Kevin Woods**

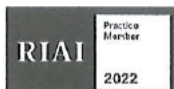


In relation to lands at

**City Centre,**

Prepared by

**Sheridan Woods**  
Architects & Urban Planners  
14 Baggot Street Lower  
Dublin 2



Charlotte Sheridan, SWAUP  
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## 1.0 Introduction

On our own behalf, *Charlotte Sheridan & Kevin Woods, of Sheridan Woods Architects & Urban Planners Ltd, 14 Baggot Street Lower, Dublin 2*, wish to make an observation on the Draft Dublin City Development Plan 2022 - 2028. Our submission relates to the Draft Dublin City Development Plan Strategic Vision for the city, with specific reference to the city centre, and the former SDRA 18, National Concert Hall Quarter.

### Draft Development Plan Principles and Land Use Zoning Objective

We note the Strategic Context and Vision for the city as set out in Chapter 1 of the Draft Plan. The Draft Plan promotes a more sustainable and resilient city, and the application of strategic principles at all levels, from plan making to urban projects and development management, to deliver a better quality of life for all. We refer to specific principles that are applicable to our submission; Social Residential / Urban Form, Health Place Making. The Draft Plan states the principles as follows:

- 'a) Social/Residential – creating a more compact city with a network of sustainable neighbourhoods (aligned with the principle of the 15 minute city) which have a range of facilities and a choice of tenure and house types, promoting social inclusion and integration of all ethnic/minority communities.*
- e) Urban Form – creating a connected, legible and liveable city with a distinctive sense of place, based on active streets and quality public spaces and adequate community and civic infrastructure.*
- f) Healthy Placemaking - ensuring quality architecture, urban design and green spaces to provide quality of life and good health and wellbeing for all.'*

Within the next 10 years, Dublin will have an established international reputation as one of Europe's most sustainable, dynamic and resourceful city regions. Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, a vibrant culture and a diverse, smart, green, innovation-based economy. It will be a socially inclusive city of urban neighbourhoods with excellent community and civic infrastructure based on the principles of the 15 minute city, all connected by an exemplary public transport, cycling and walking system and interwoven with a high quality bio-diverse, green space network. In short, the vision is for a capital city where people will seek to live, work, experience, invest and socialise, as a matter of choice.

### The Vision for the City

We also note the commendable aspiration to promote 15 minute neighbourhood concept. We note the changes in the Development Plan Land Use Zoning Objectives, and the purpose of Z4 land Use Zones. We note that *'The role of Z3 (Neighbourhood Centres) and Z4 (Key Urban Villages) have been reviewed in the context of recent socio-economic trends and resulting changes in consumer behaviour which have enhanced the importance that such centres play in serving the needs of their local population hubs and in delivering on the vision of Dublin as a 15-minute city. An increased focus on encouraging mixed use development has also been introduced in Z5 City Centre (see also Chapter 7: The City Centre, Urban Villages and Retail).'*



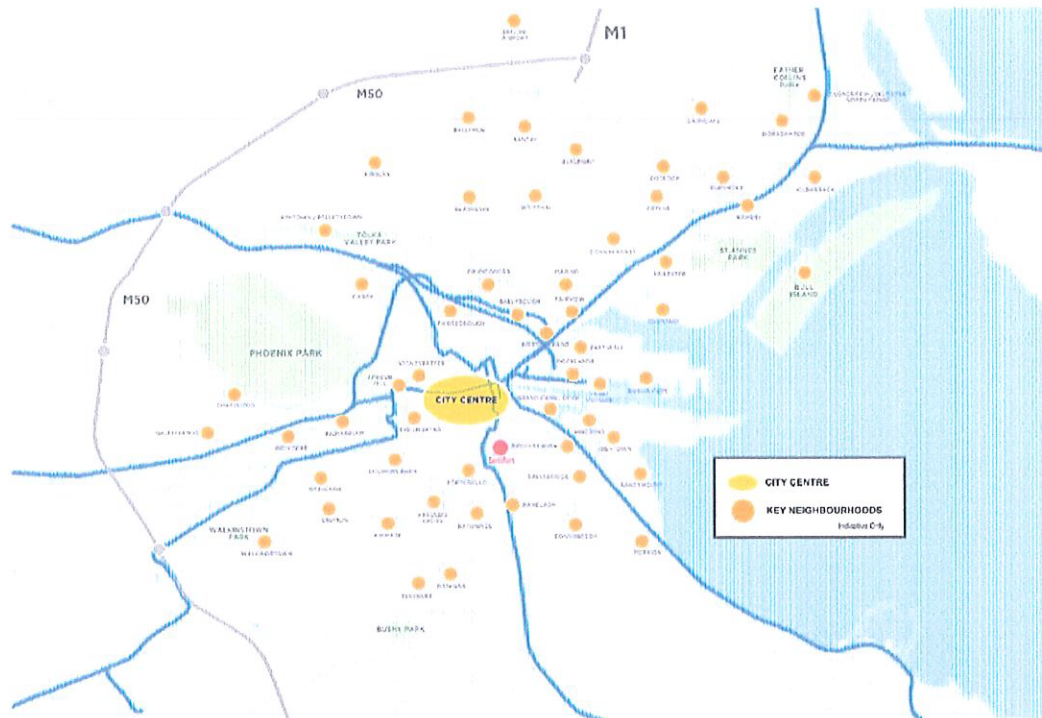
With specific reference to the city centre, and Dublin 2, we note that the Draft Development Plan has omitted the Strategic Development Regeneration Area objective for the formerly defined National Concert Hall Quarter (SDRA 18), and retains the Z6 land use zoning.

In this regard, we note that the Draft Development Plan indicates that Development principles applying to Z6 have been revised to take account of changes in planning context since 2016. There is an enhanced focus on promoting employment and providing for a wide range of local services on the city's remaining Z6 zoned lands.

For the Z8 (Georgian Conservation Areas) zone, an increased focus is placed on the need to facilitate regeneration, cultural uses and appropriate residential development whilst managing the concentration of office uses in these areas.

## 2.0 Modifications to the Draft Dublin City Development Plan – Request

We submit to Dublin City Council, that the neighbourhood concept needs to be refined to redress the negative impact of over provision of office use, and loss of residential uses in city centre locations, between the city core, and the canal. Specifically, we request that the Development Plan proactively promotes the neighbourhood concept in the Earlsfort Terrace area. Consideration should also be given to the southwest inner core, and the north east inner core.

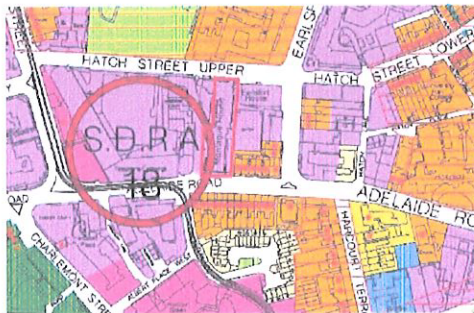


*Key Neighbourhood – Request to refine and include locations between the city centre and canal to balance the significant levels of office use, with mixed use residential and neighbourhood uses.*

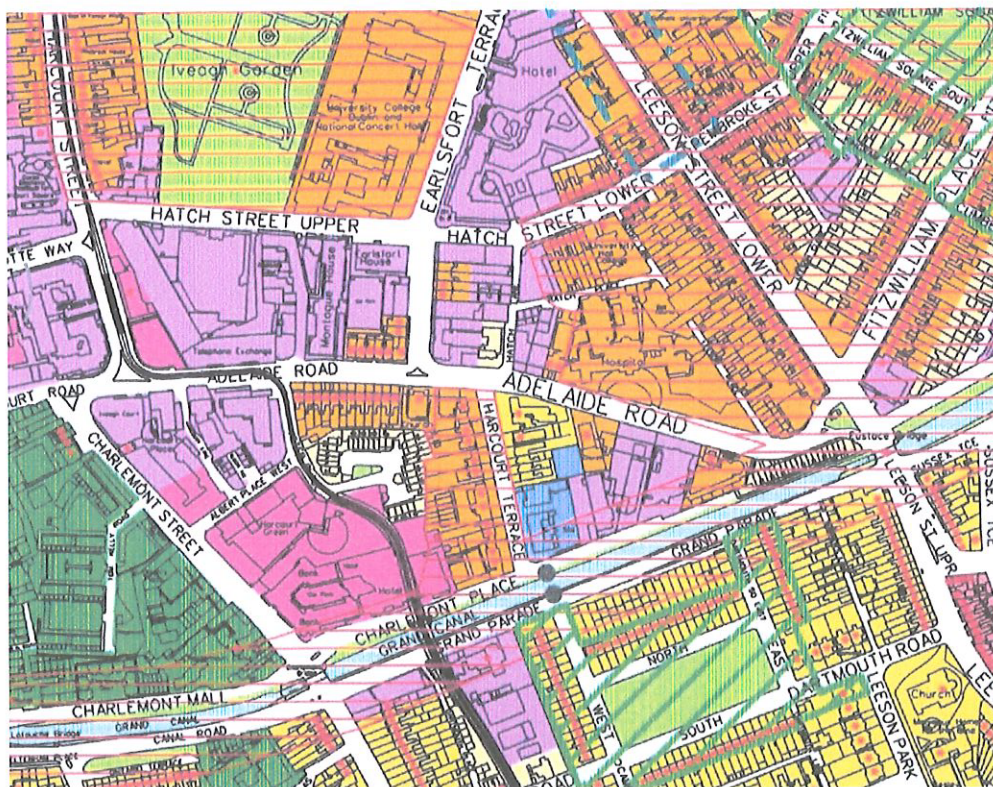
**Request 1 – Provide additional Key Neighbourhoods in locations that have developed as primarily monofunctional employment locations between the inner city core and canals – with adjustments to the land use zoning provision or inclusion of specific objectives to promote the regeneration of these locations as sustainable mixed use liveable neighbourhoods.**



We also note that the Draft Development Plan has now omitted the Strategic Development Regeneration Area objective for the Earlsfort area, formerly defined as the National Concert Hall Quarter. The SDR objective facilitated significant levels of mono functional office uses in the area in the last 5 years. In addition, significant quantum of office uses have been permitted in the environs, at the former ESB offices, and at Wilton Terrace. This has all been in the absence of any meaningful residential development and with the less of residential units. The impact of this approach became very apparent during COVID with the absence of people living in the area, consequent lack of neighbourliness, supporting neighbourhood facilities, and poor passive surveillance. Outside of COVID It is also very apparent in the evening time and at weekends that there are no residents, or supporting neighbourhood facilities, local shops, cafes etc. This undermines the potential of the area and vibrancy.



Dublin City Development Plan – 2016 - 2022 (SDRA 18 included)



Draft Development Plan Land Use Zoning Map

*Draft Development Plan*

*(SDRA Objective Omitted. The Z6 zoning for the site has been retained, and the site located adjoining and opposite Z8 Land Use Zoning. The Draft Development Plan indicates that Development principles applying to Z6 have been revised to take account of changes in planning context since 2016. There is an enhanced focus on promoting employment and providing for a wide range of local services on the city's remaining Z6 zoned lands.*



*For the Z8 (Georgian Conservation Areas) zone, an increased focus is placed on the need to facilitate regeneration, cultural uses and appropriate residential development whilst managing the concentration of office uses in these areas.*

We note the changes in the Development Plan Land Use Zoning Objectives, and the purpose of Z4 land Use Zoned. We note that *'The role of Z3 (Neighbourhood Centres) and Z4 (Key Urban Villages) have been reviewed in the context of recent socio-economic trends and resulting changes in consumer behaviour which have enhanced the importance that such centres play in serving the needs of their local population hubs and in delivering on the vision of Dublin as a 15-minute city. An increased focus on encouraging mixed use development has also been introduced in Z5 City Centre (see also Chapter 7: The City Centre, Urban Villages and Retail).'*

We request that Dublin City Council include an objective to promote the neighbourhood concept in the Earlsfort location, and other similar locations within the environs of Z6 lands and Z8 land use zones where office has become the predominant use.

We request that Z6 land use zoning is modified to incorporate a mix of uses, or that a specific objective are included for these locations to address this issue. It is well understood that two dimensional land use zoning is a crude method to achieve the well intentioned outcomes as envisioned in the Draft Plan for a vibrant, liveable city centre. In the absence of a more plan led approach, we request that sufficient flexibility should included in the land use zoning and objectives for the use class in order to ensure that an appropriate mix of use are achieved on these Z6 lands. We request that applications are accompanied with a detailed assessment of the quantum of the mix of uses in the 5 minute neighbourhood.

**Request 2 – We request that Z6 land use zoning objective is modified to include a mix of use in locations where there has been a concentration of monofunctional office uses, so that a sustainable mix of use are achieved within a definable neighbourhood. We request that neighbourhoods are identified in these location, and specification to include Earlsfort Neighbourhood.**

### 3.0 Concluding Comment

We trust that Dublin City Council will take account of our submission.

Yours sincerely



**Kevin Woods BARCH MScUrban Design MRIAI**  
SHERIDAN WOODS