



14th February 2022

Development Plan Review
Dublin City Council
Wood Quay
Dublin 8

Dear Sir/Madam,

I have have been writing for decades about planning in Dublin as Environment Correspondent (1986-2000) and later Environment Editor (2000-2015) of *The Irish Times* and as author of *The Destruction of Dublin* (1985), *Saving the City* (1989), *The Construction of Dublin* (2000), *Chaos at the Crossroads* (2005, with James Nix), *The Builders* (2008, with Kathy Sheridan) and, most recently, *A Little History of the Future of Dublin*. **I have compiled this submission as a public duty because I believe that Dublin has never been in such danger as it is now, with "proper planning and sustainable development" cast aside as the city is shamelessly surrendered to market forces.**

Chapter 1: Strategic context and vision

The draft Dublin City Development Plan 2022-2028 should carry the planning equivalent of a "health warning" or, in legal terms, a caveat: that the high ideals and design standards contained in the document are *heavily compromised, and even polluted, by mandatory planning "guidelines" handed down by successive ministers for housing and planning since 2015*. Because I have no doubt that the "specific planning policy requirements" (SPPRs) contained in the "guidelines" issued under Section 28 of the 2000 Planning and Development Act have upended the planning system to facilitate the commodification of the city for international capital investment.

This has not happened by accident. It was engineered by the property lobby to pave the way for a raft of Build-To-Rent (BTR) and so-called co-living schemes, aimed at capturing a "wall of money" from private equity and institutional funds for investment in Irish rental housing, particularly in Dublin, where rents have skyrocketed in recent years. And while "co-living" schemes are now restricted, **the past three months have seen a manic scramble by developers to beat the deadline for making large-scale housing applications directly to An Bord Pleanála — mainly for proposals that wouldn't have a dog's chance of getting permission from Dublin City Council.**

The draft city plan itself is a monumental production. Its main text runs to 413 pages, plus 437 pages of appendices and a lengthy Record of Protected Structures containing 8,691 entries. It is, therefore, quite intimidating for ordinary citizens of Dublin to assimilate in all of its detail and respond to what's set out in these documents. Inevitably, most respondents will concentrate on what's proposed for their own areas, including land use zoning, while property professionals advisers will be parsing and analysing the provisions in the draft to see what is proposed for the inner city as well as in 15 designated Strategic Development and Regeneration Areas (SDRAs).

1. The planning free-for-all of recent years:

As members of Dublin City Council will be aware, An Bord Pleanála has racked up a deplorable record in availing of Section 28 ministerial "guidelines" to override the Dublin City Development Plan 2016-2022 by granting permission for an enormous number of high-density and often high-rise BTR schemes under the Strategic Housing Development (SHD) process, which bypasses the local authority. All DCC and its planners have been able to do is to give their opinions on the appropriateness or otherwise of these schemes, but the Board (usually just three of its members) has approved the vast bulk of them, citing "national policy".

Take the case of Clonliffe College in Drumcondra, where Hines sought permission from An Bord Pleanála for an exclusively BTR scheme of 1,614 apartments, of which 71% are studios or one-bedroom units, in buildings up to 18 storeys high. This was described as "alarming" by

DCC's chief executive, Owen Keegan, in a planning submission to the Board. "It is considered that the scheme is a major missed opportunity to create an integrated, mixed income, mixed ownership and sustainable new community with a full range of apartment types and sizes," he wrote. This didn't make a blind bit of difference: a triumvirate of the Board approved it with only minor changes.

The Player Wills and Bailey Gibson sites on South Circular Road offer another glaring example of what's been going on in this manic period of "development". Dublin City Council's SDRA plan for the area envisaged the potential for one or two "mid-rise" residential buildings. Instead, the Hines proposal included no less than four towers, one of them even taller than Liberty Hall (right), derived



from a non-statutory "masterplan" concocted by senior DCC officials in collaboration with the US real estate company and the Dutch pension fund that backs it. **This was a perversion of the Dublin City Development Plan 2016-2022, for which there was zero democratic mandate.**

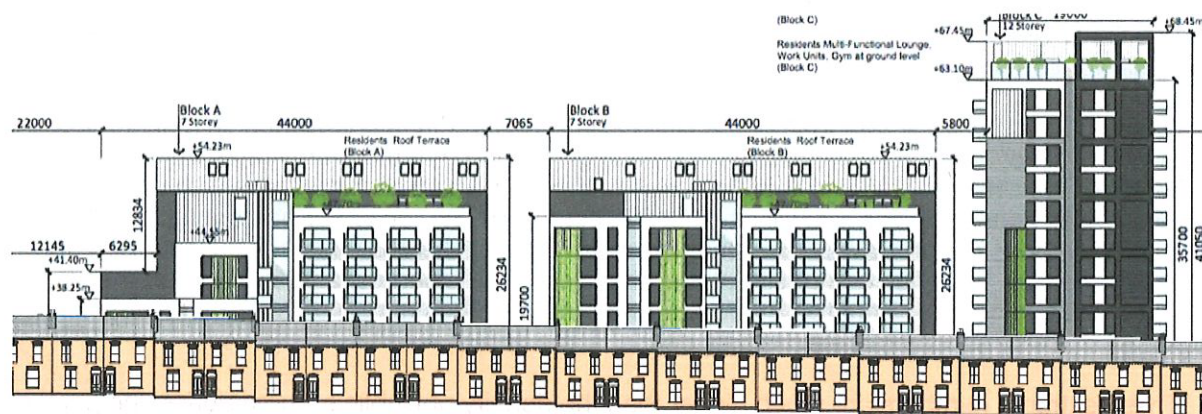
Again, An Bord Pleanála — or rather, three of its members — waved through these plans, despite the recommendation of one of its senior planning inspectors that permission should be refused for the Bailey Gibson scheme on the basis that it "would constitute gross over-



development of the site” and cause “serious injury to the amenities of the area”. This was cast aside, along with objections from 170-plus local residents and others. According to the Board’s triumvirate that approved it, again citing “national policy”, the proposed development “would not have significant adverse landscape and visual impacts arising from the number, form, bulk, scale or height of the proposed blocks ...”

On Sanford Road, south of Ranelagh (shown on previous page), a triumvirate of the Board granted permission for 671 apartments — 90% BTR — at Milltown Park, in blocks ranging in height up to 10 storeys, even though nearly 170 people, including elected representatives, had objected to the scheme and not one member of the Council’s South Central Area Committee supported the application, mainly due to concerns about height, scale, density, impact on the residential amenity of two-storey houses in the vicinity and its material contravention of DCC’s Z15 zoning of the site, to “protect and provide for institutional and community uses”. Despite this, the scheme was endorsed by the planning authority in a report submitted by its chief executive.

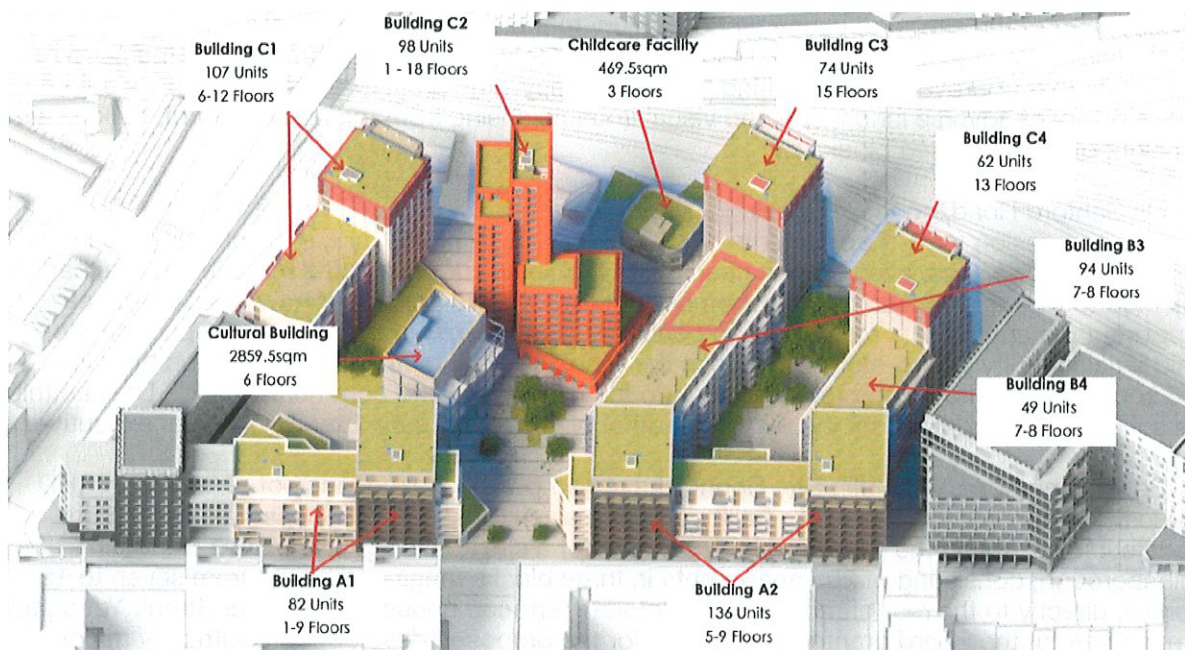
Several members of Dublin City Council have had personal experience of objecting to SHD applications and will have seen the futility of doing so, in most cases. At least five councillors made submissions on the proposed BTR scheme for a site adjoining Cross Guns Bridge in Phibsborough, consisting of 205 apartments in three blocks ranging in height from seven to 12 storeys, directly to the rear of modest late-Victorian terraced houses on Leinster Street. Yet again, a triumvirate of the Board granted permission for the proposed development, with only minor changes relating to the use of opaque glass to reduce overlooking of these houses.



Councillors will be well aware that DCC — quite rightly — sought judicial reviews in the High Court of high-handed decisions by An Bord Pleanála to approve proposed developments that materially contravened the democratically-adopted Docklands SDZ Planning Scheme, which the Board itself had approved in 2014. Quashing one of its orders in November 2020, Mr Justice Richard Humphreys said: “Which board are we to trust? The one that approved the Planning Scheme or the one that departed from it? One could equally ask why not trust the City Council who put together the detailed Planning Scheme after an extensive consultation process.”

As for claims made on its behalf that the Council was merely a “junior partner”, whereas the board is a “national authority”, he observed, witheringly: “Comparing the council’s decision on an individual planning application with the board’s decision on appeal would be comparing like for like, but comparing an overall scheme with an individual consent is not.” As a result of this ruling, An Bord Pleanála had no option but to refuse permission for the super-tall towers proposed by Ronan Group Real Estate and Colony Capital for North Wall Quay — the so-called Waterfront South Central — even though it would have quite happily approved the scheme otherwise.

Just north of the Docklands SDZ boundary, sandwiched between railway lines and Sheriff Street Upper, the Board granted permission for another high-rise development of 702 BTR apartments — the bulk of them studios or one-bedroom units — in blocks ranging in height up to



19 storeys, with a **shockingly high density of 377 units per hectare**. According to a triumvirate of the Board, however, this outrageous example of over-development would “constitute an acceptable residential density in this suburban [*sic*] location, would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height and quantum of development ...”

Sterling work by Robin Mandal, of the Dublin Democratic Planning Alliance, in researching SHD approvals by An Bord Pleanála has convincingly shown that the triumvirates adjudicating on these scheme have repeatedly granted permission for BTR apartment schemes with grossly excessive densities, of which we will cite just five examples: 330 units per hectare (uph) at the former Heidelberg site on Davitt Road, Inchicore; 347 uph at Clarehall, Malahide Road; 626 uph on the former IDA business centre site at Newmarket, in The Liberties; and 633 uph on the former Hickey’s site just north of Heuston Station, where the Board has approved a 30-storey residential tower. All of these schemes are extremely dense — the latter two, staggeringly so.

These extreme numbers are much higher than the density of Dublin’s slums during the peak of the notorious tenement era more than a century ago, as Mandal has pointed out. There is no comparison in spatial terms, of course; whole families will not be living in one or two rooms. But the vast bulk of BTR schemes are heavily tilted towards studios or one-bedroom units in what amounts to a much more expensive version of the “shoebox flats” churned out by Zoe Developments in the 1990s, which at least provided affordable accommodation. What we are witnessing now is a working out of the market’s determination to squeeze the last drop of “value” out of every site — all with the imprimatur of An Bord Pleanála.

As a planning authority, DCC itself has been involved in granting permission for appalling schemes with building heights and densities far in excess of those provided for under the Dublin City Development Plan 2016-2022, taking its cue from the mandatory ministerial guidelines rather than abiding by the democratically-adopted city plan. **One of the most appalling cases involved the former DIT site on Kevin Street Lower, where the planners approved a large-scale office development up to 11 storeys in height as well as 299 BTR apartments, the vast bulk of them studios or one-bedroom units, in blocks up to 14 storeys in height. And now the developer is coming back for more, increasing this massive scale still further.**

So far, however, there is not much to show for all of this activity — as demonstrated by Section 5.2 of Volume 2 (Appendices), dealing with planning and construction activity for new housing supply and focusing on the low uptake of permissions. “This analysis demonstrates a trend that, notwithstanding the high volume of extant permissions, *only approximately one fifth of the permissions granted are being realised on the ground* [emphasis added]. The reasons for this

are many, including the complex nature of site development, acquisition, land speculation and funding models in the city". *High Court judicial reviews sought by aggrieved objectors have been a factor in many cases, though not anything like as much as the property lobby has claimed.*

2. Unacceptable allocation for BTR in the draft plan:

Chapter 5: Quality Housing and Sustainable Neighbourhoods

City Planner John O'Hara told *The Irish Times* (24 January 2022) that proposed restrictions on BTR did not constitute a "ban", as claimed by the property lobby. *"The draft development plan is predicated on the whole notion of neighbourhood-making and sustainable communities. What we are looking for is a tenure diversity across the spectrum.* Build-to-rent has only emerged in the last three years, but it has largely displaced build-to sell altogether," he said. "The message from the property industry is that this is going to sink the whole build-to-rent typology. That is not the intention – with 40 per cent build-to-buy, the majority is still build-to-rent."

Policy QHSN37 of the draft plan states: "It is recognised that Build to Rent (BTR) serves an important role in meeting housing demand and can fill a gap in tenure mix in established areas of owner-occupier housing. Recent emerging trends however, would indicate that the dominance of BTR in large schemes can be to the detriment of build-to-sell units. Whilst such development has its place in the hierarchy of provision of homes across the city, *the Planning Authority will seek to avoid over proliferation of such use in certain areas and encourage such development as part of a healthy mix of tenure in order to create sustainable communities and neighbourhoods*".

To achieve this objective, it states that *"there will be a general presumption against large-scale residential developments (in excess of 100 units) which comprise 100% BTR typology.* To ensure a sustainable mix of tenure and long-term sustainable communities, a minimum of 40% of standard build-to-sell apartments will be required in such instances ... Furthermore, applications for BTR schemes should be required to demonstrate that there is not an over-concentration of Build-to-Rent Accommodation within an area, including a map showing all such facilities within 3km of a proposal".

However, Policy QHSN37 also states that *"BTR should be concentrated in prime inner city areas [emphasis added]* and also in areas of high-intensity employment use such as within 500 metres walking distance of a high employment area [and/or] within 500m of major public transport interchanges (e.g. Connolly Station, Tara Street Station and Heuston Station) and within identified Strategic Development Regenerations Zones". *This amounts to invidious discrimination against the inner city in particular, because a mix of tenure is essential for the creation of sustainable communities in the heart of Dublin, and I would call on councillors to reject it.*

Section 5.4.3 of Volume 2, dealing with purpose-built apartment blocks, abstracts figures from the 2016 Census showing that the number of *owner-occupied apartments account for only 17.2% of this housing category,* compared to 22.4% rented from DCC or approved housing bodies (AHBs) and 51.3% in the private rented sector, with the remainder (9.2%) in a nebulous "Free of Rent/Not Stated" category. It is clear, however, that purpose-built apartments in the private rented sector (PRS) outnumber owner-occupied apartments by *a factor of three* throughout the DCC area. It is likely that figures for the inner city are even more skewed towards PRS. [Appendix 1: Housing Strategy](#)

The proposal that BTR schemes, with no requirement for a build-to-sell element, *"should be concentrated in prime inner city areas"* *would simply reinforce the already unbalanced mix of tenure in the heart of Dublin.* In my experience, owner-occupiers (and long-term renters) are the bedrock of any community because they have a stake in the area and take a much keener interest in what's going on, compared to those who are renting for shorter periods. It should be noted that the BTR model of development was intended from the outset to cater for *"an increasingly mobile workforce"*, as stated in paragraph 1.3 of the 2015 Apartment Design Guidelines. [Chapter 2: Core Strategy](#)

Section 2.4, entitled Settlement Strategy, “prioritises development in the inner city and the Key Urban Villages [KUVs]. It also specifically targets the Strategic Development and Regeneration Areas [SDRAs], which are primarily brownfield lands located in both inner and outer city areas, where there is capacity to absorb a greater intensification of development owing to their proximity to public transport corridors and supporting urban infrastructure”. *Fifteen such areas are identified in the draft plan — and in all of them, it would appear that 100% BTR schemes would be permitted, at the expense of build-to-sell. This would be a grave error.*

Given that the 2018 Apartment Design Guidelines further reduced standards to facilitate BTR schemes with “no restrictions on dwelling mix” (SPPR 8), I warmly welcome the statement in Section 15.9 of the draft: “Apartment schemes make up the majority of the new housing stock in Dublin City. In this respect, it is, therefore, essential that high-quality, attractive and liveable apartment units are provided. All apartment developments should make a positive contribution to the local area in terms of public open space and/or public realm improvements and should provide long term living environments for future residents through quality communal amenity spaces and attractive and sustainable internal units” — *although I suggest that the word “units” here should be replaced with “spatial dimensions”.* [Chapter 14: Land Use Zoning](#)

I agree strongly with the requirement that all planning applications for 15 or more residential units in the “North Inner City and Liberties Sub-City Areas” would have include a minimum of 15% three or more bedroom units and a maximum of 25%-30% one bedroom/studio units. *If Dublin City Council is really serious about achieving higher standards in apartment schemes, including the provision of family-sized accommodation, I believe that these enhanced requirements should apply to all residential developments in the inner city, and call on councillors to amend Section 15.9 accordingly, irrespective of the ministerial “guidelines”.*

Given the large number of “co-living/shared accommodation” schemes permitted by An Bord Pleanála over the past two years, I welcome Policy QHSN41, which states that “there will be a general presumption against the granting of planning permission for shared accommodation/co-living in Dublin City”, in line with SPPR9 of the 2020 *Sustainable Urban Housing: Design Standards for New Apartments*, and also Policy QHSN42 to “avoid the proliferation and concentration of clusters of build-to-rent/student accommodation/co-living development in any area of the city”. *Sadly, these commitments are coming very late in the day.* [Chapter 5: Quality Housing and Sustainable Neighbourhoods](#)

The current draft does not address the pressing need for new housing for owner-occupation, particularly in the inner city. Surveys indicate that, for one-third of existing tenants, renting is not a choice but rather a necessity driven by the lack of affordable housing for purchase. This in turn is driving many Dubliners out of the city in search of affordable alternatives in the outer suburbs and even further afield. *There is no credible case made in the draft for exclusively BTR schemes in the inner city. I would argue that, where communities have been hollowed out (as in the case of Dublin city centre), BTR needs to be banned outright in favour of mixed-tenure housing that will create sustainable inner city communities.*

3. Urban density in the city:

[Chapter 4: Shape and structure of the City](#)

Section 4.5.3 of Volume 1, entitled Urban Density, acknowledges that “good quality, higher density developments can make a positive contribution to the evolving urban form and structure of the city and can help to achieve sustainable land use and movement patterns”. It also states that “the goal is to provide for a compact city with attractive mixed-use neighbourhoods, a variety of housing types and tenure, adequate social and community infrastructure and adaptable housing, where people of all ages will choose to live as a matter of choice”. *If this is the objective, it surely follows that there must be a mix of build-to-sell apartments as well as build-to-rent.*

Policies on urban density are amplified in Section 3.2 of Volume 2, which states that excessive density “can be problematic. Significantly higher density schemes, particularly when coupled with high buildings, can generate problems in terms of creating successful, well-designed and

sustainable communities. In some instances, it can have impacts on the amenities of existing residential communities and for the future occupiers of such schemes, as well as how such developments integrate with the existing urban fabric. There can also be concerns regarding the capacity of existing social and physical infrastructure to absorb denser developments". [Appendix 3, Volume 2](#)

I strongly agree, especially in the wake of An Bord Pleanála waving through so many massively over-dense schemes that will come as a great shock to Dubliners when they're built. In that context, I am encouraged by DCC's commitment that "sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity. Public transport accessibility and capacity will also determine the appropriate density permissible".

I also agree with the following statement in Section 3.2 of Volume 2 that "a varied typology of units will be encouraged to ensure a diverse choice of housing options in terms of tenure, unit size and design in order to ensure demographic balance in residential communities. All proposals for higher densities must demonstrate how the proposal contributes to healthy placemaking, liveability and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods". However, this formulation falls well short of the approach to housing in the Dublin City Development Plan 2011-2017.

Section 11.3 of that document from a decade ago aimed to provide for "an appropriate quantity and quality of residential accommodation incorporating sustainable densities and designs [with] a variety of housing typologies and tenures which are adaptable, flexible and meet family needs and the changing needs of people throughout their lives ... that is accessible and affordable for all residents of the city through the implementation of the housing strategy [so as create] attractive mixed use sustainable neighbourhoods which benefit from the phased delivery of supporting infrastructure" — in other words, the very opposite of what's prescribed by the dumbed-down apartment design standards decreed by mandatory ministerial "guidelines".

Section 3.2 of [Volume 2, Appendix 3](#) states that "there will be a general presumption against schemes in excess of 300 units per hectare" due to concerns that that "very high density can challenge positive responses to context, successful placemaking and liveability aspirations, sometimes resulting in poor quality development. Schemes in excess of this density will be only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented". It goes on to provide the following table outlining the density ranges that would be acceptable, with the highest (100-250 uph) earmarked for the inner city and SDRA areas.

Table 1: Density Ranges

Location	Net Density Range (units per ha)
City Centre and Canal Belt	100-250
SDRA	100-250
Key urban Village	60-150
Former Z6 (industrial land)	100-150
Outer Suburbs	60-120

To put this in context, comparable density ranges in other European cities include 100-150 units per hectare in Amsterdam, 170-200 uph in Copenhagen and 100-225 uph in Paris, to give just three examples. It should be noted that central Paris, within the Boulevard Périphérique, has a population of 2.2 million, with the vast majority living in apartment buildings 5 to 8 storeys in height. The danger in specifying an upper limit of 250 uph for the inner city is that this would

become the default number for new developments. I would suggest that 200 uph should be set as a more reasonable cap in the context of Dublin city centre.

4. Building heights in the city:

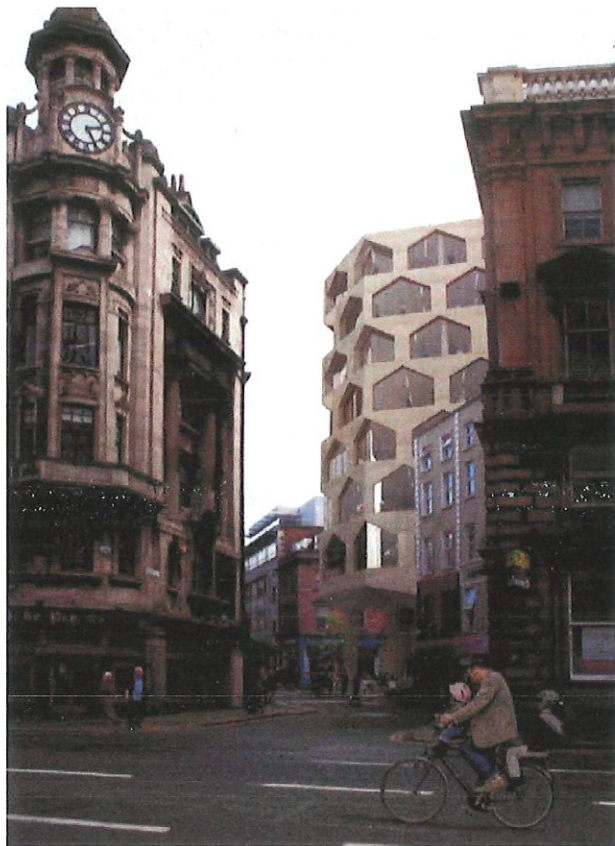
Section 4.5.4 of the Dublin City Development Plan 2016-2022, stated that Dublin City Council “acknowledges the intrinsic quality of Dublin as a low-rise city and considers that it should remain predominantly so. The vast majority of the city area is identified as not being suitable for mid-rise or taller buildings. The City Council remains committed to the need to protect conservation areas, architectural conservation areas and the historic core of the city. However, taller buildings can also play an important visual role and can make a positive contribution to the skyline of a city. Dublin City Council recognises the merit of taller buildings, including landmark buildings, in a very limited number of locations at a scale appropriate for Dublin”. [Chapter 4: The Shape and structure of the City](#)

This has been watered down significantly on foot of the 2018 *Urban Development and Building Heights* “guidelines”, so that the current draft states, in Section 4.5.4, that “the spatial approach to landmark/tall buildings in the city is in essence to protect the vast majority of the city as a predominantly low-rise city, including established residential areas and conservation areas within the historic core, while also recognising the potential and the need for taller landmark buildings to deliver more sustainable compact growth” — mainly in areas identified for large-scale regeneration and redevelopment that are well-connected centres of employment, with “the capacity to create their own character and identity”.

“When considering building height”, it says, “regard must be had to the prevailing context within which the site is located” and that “the appropriateness of building heights is also a key consideration within the historic core ...”.

This is merely platitudinous when the planning authority itself approved an alien, grossly over-scaled nine-storey office block to replace Moira House and the Trinity Street car park, despite having serious reservations about its height (shown on previous page). Appeals to An Bord Pleanála by An Taisce and myself made no difference to a triumvirate of the Board, who endorsed this dreadful scheme —even though its own senior planning inspector had recommended that it should be reduced in height by two storeys “in the interest of the protection of the skyline, the visual amenities and the urban character of the historic city core and the amenities of the area.”

It is a relief that Section 4.5.4 also states: “Clustering of taller buildings of the type needed to promote significant densities of commercial and residential space are likely to be achieved in a limited number of areas only”. This will come as a disappointment to the property lobby and the aptly-named Planning Industrial Complex that serves it, because what they are aiming to achieve Dublin is something like what’s happening in the Nine Elms area of Vauxhall in London, a jumble of high-rise BTR and office towers in a dystopian architectural zoo (shown on next page). If any such super-tall clusters are envisaged here, this needs to be clearly spelled out in the city plan.





Appendix 3 of the draft fleshes out a “strategic approach” to building height and density, stating that “the general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, key urban villages, areas close to high frequency public transport and some other areas ... considered as suitable for increased intensity of development”. It goes on to state that “as a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes” would be promoted. [Volume 2, Appendix 3](#)

Section 16.7.2 of the current city plan rather bizarrely capped new residential buildings in the inner city at 24 metres and office developments at 28 metres. I welcome the identification of a “default position” of six storeys within the canal ring, in line with the 2018 building height guidelines, subject to “site-specific characteristics and heritage/environmental considerations”. Obviously, this cannot be applied across the board as there are swathes of two-storey housing in the inner city, and these areas must be safeguarded from assault by developers bent on creating “local pop-up features” on a random basis.

Temple Bar Residents, which I chair, has made the point in its submission on the “pre-draft consultation” that all areas targeted for new high-rise clusters must be clearly identified in the city plan and followed by local area plans drawn up with full public participation by local communities, instead of having tower blocks foisted upon them that would fundamentally change the character of their areas: **Densification of the built-up area, whether in the inner city or the inner suburbs, can be achieved by developing brownfield sites without peppering the city’s skyline with tall buildings even higher than Liberty Hall. Higher density does not necessarily involve high-rise buildings.**

The performance criteria for “enhanced density and scale” laid out in Table 3 are generally positive. So is the acknowledgment in Section 5.0 ([Volume 2, Appendix 3](#)) that landmark or tall buildings can have “a significant detrimental impact on local character and the wider city, if the location or design is unsuitable. They can also have other adverse impacts including putting undue pressures on social and physical infrastructure, impacting negatively on existing residential

amenities and significant adverse environmental impacts". Tall buildings are significantly more costly to construct, due to the need to provide extra lifts and fire safety precautions, and therefore would not provide affordable housing, but rather "trophy apartments" for the rich.

Given the vital importance of protecting the human scale and intimacy of Dublin city centre, I disagree with the bald statement that "such buildings have a role to play in the fabric and evolution of the urban form of the city". But if we are to have more "landmark buildings", I agree that "their development should only be in instances where there is a compelling architectural and urban design rationale for them and where it can be demonstrated that they make a significant contribution to regeneration and the economic, strength, performance and resilience of the city".

Again, I would stress that the "limited areas in the city that are capable of sustaining the economic and environmental impact of such landmark/tall buildings" must be explicitly identified. It is not sufficient merely to state that "it is considered that landmark/tall building proposals are most appropriate in locations that are identified as a significant public transport interchange and/or areas for large-scale regeneration and redevelopment; that are well connected centres of employment; which have the capacity to create their own character and identity and where the existing character of the area would not be adversely affected by the scale, mass and height of a landmark/tall building".

Neither is it sufficient to place the onus on developers to demonstrate in their application documentation that any particular site is appropriate for a landmark/tall building. Vast volumes of verbiage, computer-generated images and photomontages have been generated by the Planning Industrial Complex in progressing outrageously overblown high-rise SHD applications to An Bord Pleanála in recent years, as detailed in Section 1 of our submission, and most of these schemes have been approved by triumvirates of the Board. What's been happening is an egregious example of "developer-led planning" when what we need is "plan-led development".

In general, however, I agree that even where any particular site has been identified as an appropriate location for a landmark building, the proposal must meet *all* of the performance-based assessment criteria laid down in Table 4. "Any proposal for a landmark/tall building/s must undertake a thorough context and urban design analysis and a Cityscape Assessment including detailed modelling and photomontages. It must be demonstrated that the landmark/tall building proposal will not have an adverse impact on sensitive locations including conservation areas and protected structures and sensitive views. even where a site has been identified as an appropriate location for a landmark/tall building, the proposal must meet all of the performance-based assessment criteria for landmark/tall buildings."

Dealing with higher buildings in historically sensitive areas, Section 6.0 notes that "developments of significant height and scale are generally not considered appropriate in historic settings including conservation areas, architectural conservation areas, the historic city centre, the River Liffey and quays, Trinity College, the Cathedrals, Dublin Castle and medieval quarter, the Georgian core and historic squares and the canals or where the setting of a protected structure would be seriously harmed by the inappropriate locating of such a proposal". This amounts to closing the stable door after the horse has bolted, given that planning permissions have already been granted for two tall towers in Tara Street, intervening between the Custom House and Trinity College, as well as a hotel on Great Ship Street that intrudes into the setting of Dublin Castle.

5. Dereliction, vacancy and the city's heritage:

There is a lack of ambition — more specifically, a lack of targets — on making full use of vacant, derelict and underutilised buildings for housing. This is a particular gap given the extremely slow pace of new housing delivery. CSO8, for example, pledges merely "to promote active land management including the vacant site levy and the Living City Initiative as a means to encourage brownfield development and densification in the city", while CSO9 aims "to implement the vacant site levy for vacant development sites as appropriate [emphasis added] in the city and to continue to make a publicly available register of vacant sites ...", and Policy CSO10 pledges "to prepare, where appropriate, masterplans and other non-statutory plans or strategies to actively encourage and support the development of brownfield, vacant and regeneration sites". [Chapter 2: Core Strategy](#)

Policy QHSN6, dealing with upper floors, states that DCC will “resist and, where the opportunity arises, reverse the loss of residential use on upper floors and actively support proposals that retain or bring upper floors into residential use in order to revitalise the social and physical fabric of the city ...”. It goes on to state that the Council “will actively engage with property owners and other stakeholders at a national level to investigate other alternative measures in addition to the Living City Initiative to expedite bringing upper floors into residential use, and will be actioned by the City Recovery Task Force and its successor”. [Chapter 5: Quality Housing and Sustainable Neighbourhoods](#)

Given the scale of dereliction and vacancy on historic streets, such as Aungier Street, a much more pro-active approach is urgently needed. I propose that Dublin City Council establishes a successor to the City Recovery Task Force, with personnel drawn from relevant Council departments, including the Conservation Section and Dublin Fire Brigade, to (i) identify historic buildings at risk, particularly in the city centre, (ii) survey the extent of underutilisation of upper floors in the heart of Dublin, and (iii) provide comprehensive advice to property owners on how to overcome whatever obstacles are standing in the way of converting these buildings for residential use. This should all be spelled out in the draft city plan, to replace or add to the more nebulous policies outlined in CS08-CS10 and QHSN6. [Chapter 7: The City Centre, Urban Villages and Retail](#)

Policy BHA25 is important in this regard in stating that “there will be a presumption against the loss of upper floor access to buildings from street frontages, and the City Council will seek reinstatement of upper floor access points wherever possible from the street”; **without independent access to upper floors, converting these often under-utilised spaces for residential use would be impossible.** I should add that I’m writing this submission in an apartment on the third floor of a renovated 1840s warehouse building in the middle of Temple Bar, which has its own entrance from the street and three separate retail units on the ground floor. [Chapter 11: Built Heritage and Archaeology](#)

I welcome Policy CCUV18, on the conversion of upper floors for residential use, such as what has already been achieved by Clarendon Properties above the H&M store on College Green, but would suggest that it should be amended as follows: “To encourage, support and promote more residential apartments as part of mixed-use developments or through the reuse / retrofit of the upper floors of existing buildings **INSERT whether these are located on Category 1 or Category 2 streets.** The use of upper floors for residential use is supported in principle on Category 2 Shopping Streets **INSERT and will also be supported on Category 1 streets.** [Chapter 7: The City Centre, Urban Villages and Retail](#)

I welcome the statement in 3.5.2 that “a key mitigation measure in relation to the built environment is to ensure that proposals for substantial demolition and reconstruction works can be justified having regard to the ‘embodied carbon’ of existing structures as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures”. We also welcome policies CA5, dealing with the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible, and CA6 on achieving “appropriate energy efficiency measures” for the existing building stock in the city, **providing that this would not impact adversely on protected structures.** [Chapter 3: Climate Action](#)

In the section dealing with 20th century architecture, Policy BHA15 pledges to “encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised”, while Objective BHAO6 aims to “identify and protect exemplar buildings of the twentieth century; to categorise, prioritise, and, where appropriate, add to the Record of Protected Structures (RPS); to produce guidelines and offer advice for protection and appropriate refurbishment of such structures”. **However, I can find only two new additions to the RPS from the 20th century: the former Central Bank on Dame Street and the RTÉ radio and television complex at Montrose, in Donnybrook. This is totally unacceptable.** [Chapter 11: Built Heritage and Archaeology](#)

Given that the Council’s Heritage Officer commissioned an important body of research on Dublin’s 20th century architecture, which has already led to the publication of *More than Concrete Blocks, Vol. 1, 1900-1940*, and *More than Concrete Blocks, Vol.2: 1940-1972*, with another

volume to come covering the period 1972-2000, I would suggest that the time has come for DCC to go beyond mere platitudes by actually listing many more 20th century buildings in the Record of Protected Structures and that ALL of the buildings documented in the *More than Concrete Blocks* series should be added to the RPS as part of this city plan review. Otherwise, Dublin is in danger of losing essential elements of its heritage. Similarly, all of the buildings of whatever period in the city rated as being of “regional importance” in the National Inventory of Architectural Heritage should be added to the RPS, as they have been already surveyed and appraised by a reputable State agency.

In every instance where development is proposed involving a protected structure, the Council’s Conservation Section should be consulted — as it was, for example, in the Cobblestone case, on which it produced a comprehensive report that informed DCC’s firm decision to refuse planning permission for the proposed nine-storey hotel over-sailing two protected structures, including the Cobblestone pub itself. *The Conservation Section should also be consulted on all planning applications for infill development in historic streets, and this should be included as an objective in the draft city plan. Had the planning authority asked for a report on the proposed nine-storey office block on Trinity Street, the outcome of that case would have been very different.*

Section 11.5.2, on Architectural Conservation Areas (ACAs), states that these are designated “in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city ... often derived from the cumulative impact of the area’s buildings, their setting, landscape and other locally important features which developed gradually over time”. Obviously, as a long-time resident of the area, I agree with Temple Bar Residents that the whole Temple Bar quarter should be designated as an Architectural Conservation Area (ACA) — not least because of (i) its unique blend of historic buildings and more recent contemporary architecture and (ii) the fact that there are only three derelict sites remaining to be developed in the area. *Accordingly, I would strongly urge councillors to add Temple Bar in its entirety to the list of ACAs in Section 11.5.2.*

In relation to policy SC2, dealing with the city’s character, I welcome the commitment to protect “the grain, scale and vitality of city streets and encouraging the development of appropriate and sustainable building heights to ensure efficient use of resources, services and public transport infrastructure and that protects the heritage and natural assets of the city” — *providing that these “appropriate and sustainable building heights” show respect for their context, and I would suggest that the relevant wording should be amended accordingly, and also to amend the reference to “revitalising the north and south Georgian squares and their environs”, which are largely dead after dark, with the addition of “by curtailing office use and encouraging a reversion to residential use;”.* [Chapter 4: Shape and structure of the city](#)

I would also flag concerns about Policy QHSN5, on urban consolidation ([Chapter 5: Quality Housing and Sustainable Neighbourhoods](#)). It aims to “promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation”. Backland development in the Georgian core, including replacement of mews buildings with larger blocks — such as what has been permitted to the rear of Henrietta Street, North Great George’s Street, Merrion Court and St Stephen’s Green North — has (or will have) damaging impacts on the architectural integrity of these heritage areas. *The production of a “best practice design guide on mews development in the city, as mentioned in Objective BHA05, is long overdue and should be commissioned or carried out without further delay.*

6. Striking a balance on urban development:

Like nearly everyone else, I would endorse Policy QHSN10 “to promote the concept of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high-quality housing and well-designed, safe and inclusive public spaces served by local services, amenities and sustainable modes of transport”. The “15-minute city” is a new buzz word in urban planning, but the idea is almost as old as the hills. Georgian Dublin was a compact city where everyone could meet their daily needs within a 15-minute walk from where they lived. It was only through relentless suburbanisation from

the 19th century onwards that the city lost the nearness of everything. [Chapter 5: Quality Housing and Sustainable Neighbourhoods](#)

There is a real risk, however, that adoption of the “15-minute city” concept will be used by developers to justify high-rise, high-density housing schemes and office blocks in the Key Urban Villages and SDRAs identified in the draft city plan. This underlines yet again the need for “plan-led development”, whereby local area plans are drawn up for each of these areas in full consultation with local communities, instead of having new buildings of significantly larger scale, both in bulk and height, imposed on them — as has happened, for example, on two nearby infill sites in the village of Harold’s Cross, one of them previously occupied by the Classic Cinema.

On tourism, Section 6.5.6 of the draft plan quotes Fáilte Ireland’s figures showing that in 2019 Dublin “welcomed 6.3 million overseas tourists and 1.7 million domestic trips, generating a total spend of €2.4 billion and supporting 65,000 jobs” — although these numbers collapsed due to the Covid pandemic. Numerous new hotels have been built or planned in the expectation that the tourism sector will recover, including two large hotels next door to each other at Molyneux Yard, off Thomas Street. **Indeed, many residents of The Liberties have been wondering whether anything else other than hotels and blocks of student housing will be built in the area.** [Chapter 6: City Economy and Enterprise](#)

In this context, I welcome the statement that “it will be important to avoid the over-concentration of hotel development in areas of the city which currently have high levels of existing hotel, apart-hotel and student accommodation development, or in areas where significant number of planning applications have been made for new or expanded hotel and apart-hotel development. Avoiding an over-concentration of hotel development in certain areas of the city centre is particularly important in the context of wider objectives to create a rich and vibrant range of uses in the city centre”.

As a result, Section 15.14.1 of the draft ([Chapter 15: Development Standards](#)) states that “where the planning authority deems there to be an over-concentration of such facilities in an area, the applicant will be requested to submit a report indicating all existing and proposed hotel and apart-hotel developments within a 1km catchment and justification that the development will not undermine the principles of achieving a balanced pattern of development in the area. In addition, there will be a presumption against the use of houses or apartments for short-term lets in all areas of the city”. **I welcome these strictures as a step in the right direction to achieve more balanced development, especially in the inner city.**

In relation to Policy CEE28, laying down criteria for the assessment of plans for more tourist accommodation in the city, I would propose an additional point to insert after “the need to prevent an unacceptable intensification of activity, particularly in predominantly residential area”, the following: **the need to protect the city’s housing stock against its dilution by the conversion of homes, whether houses or apartments, into tourist short-let accommodation and to take enforcement action to recover as many units as possible where such use is unauthorised.** [Chapter 6: City Economy and Enterprise](#)

Policy CCUV35 pledges to “support and facilitate evening/night-time economy uses that contribute to the vitality of the city centre and that support the creation of a safe, balanced and socially inclusive evening/night-time economy”. **Importantly, it is followed by Policy CCUV36, dealing with new development, which explicitly supports “uses that would result in the diversification of the evening and night-time economy where there is little impact on the amenity of adjoining or adjacent residential uses through noise disturbance and where there are no negative cumulative impacts in terms of other night-time economy uses in the area”.** [Chapter 7: The City Centre, Urban Villages and Retail](#)

Noise issues relating to the night-time economy are dealt with in Temple Bar Residents’ submission on the draft city plan and should be taken on board by Dublin City Council, particularly the proposal for a citywide by-law to prohibit the use of external loudspeakers at bars, nightclubs, cafés and even shops. There is zero justification for polluting the public realm with needless noise. **Other European cities have tackled the noise problem by requiring music venues**

to acoustically insulate their premises so as to prevent “entertainment noise breakout”, particularly where people live, and there is no valid reason why Dublin cannot do so.

7. Looking after the public realm:

According to Section 7.2 of the draft city plan ([Chapter 7: The City Centre, Urban Villages and Retail](#)) the improvement of the public realm in the city centre is being addressed through the implementation of the City Council's Public Realm Strategy ('Your City - Your Space', 2012), and area-based public realm plans including:

- the Grafton Street Quarter Public Realm Improvement Plan, 2013;
- the 'Heart of the City' Public Realm Masterplan for the City Core 2016; and
- the Temple Bar Public Realm Plan, 2016.”

It is not at all clear to me that these plans are being implemented on the ground. The Temple Bar Public Realm Plan was never formally adopted by the City Council and not one of its recommendations has been realised. Neither has there been an audit of how many of the pledges made in DCC's Public Realm Strategy *Your City - Your Space*, have actually been implemented over the past 10 years. The same goes for the *Heart of the City* Public Realm Masterplan, as the only major improvements have been confined to Grafton Street, Chatham Street, Clarendon Street and part of Wicklow Street, while the travesty of covering Castle Market with cheap and cheerless beige asphalt — like brown bread dough — shows that the Council's Roads Department remains a law unto itself, impervious to the basic principles of civic design.

Ten years ago, *Your City - Your Space* said: “It's time to declutter!”, noting that there had been “a proliferation of street furniture, signage and other forms of street clutter in recent years. Some of this is in response to legal requirements, some is caused by low controls on informal installations and signage. This clutter has negatively affected the accessibility of spaces and their visual quality. Removing or reducing clutter where possible would contribute positively to the public realm. An audit of street furniture shall be carried out to identify the extent and location of redundant street furniture as a first step in decluttering the city as part of local public open space projects and other environmental projects. This will include private signage erected on Dublin City Council traffic poles and public lighting columns”.

Although the current city plan – adopted in 2016 – pledged to reduce signage clutter by at least 20 per cent, there is no indication that this has been achieved; if anything, it has become even more pervasive, as I have noted in my latest book, *A Little History of the Future of Dublin*. The Department of Transport's *Traffic Signs Manual* (2010), which imposes an obligation on local authorities to comply with its standards, advises that “clutter of signs and other street furniture should be avoided as far as possible”. Yet Michael Banim, a sustainable mobility master's degree student at TU Dublin in 2020, counted 97 assorted sign posts, traffic signals, bollards and pylons within 30 metres of the junction of O'Connell Street and Abbey Street.

Incredibly, the draft plan has nothing to say about whether the audit of “existing street furniture poles and signage in the public realm”, promised in the current city plan, was ever carried out. Certainly, there is no indication that “the aim of removing at least 20% of such redundant elements” was achieved. Accordingly, I strongly recommend the following addendum to Section 15.17.4: “It is an objective of Dublin City Council to carry out a comprehensive audit of all road signage, poles and similar ‘street furniture’ throughout the city centre with a view to reducing clutter by 50% over the period of this plan”. The justification for aiming so high is that (i) street clutter is so pervasive and (ii) setting a high target makes it more likely that this issue will be taken seriously. [Chapter 15: Development Standards](#)

Faced with the proliferation of unauthorised “sandwich boards” (also known as “A-boards”) on footpaths in the city centre, obstructing pedestrians — particularly those with mobility challenges — the Council decided in 2019 to introduce an annual fee of €630 for each board, and this measure proved to be remarkably effective: almost all of the “sandwich boards” disappeared from



the city's streets, virtually overnight. Now DCC must deal with the clutter under its direct control, as evidenced by the case of College Green.

The state of College Green is a national disgrace. Although unquestionably Dublin's great architectural set-piece, it is the most scarred urban landscape in the city, with a countless traffic signs on poles as well as bollards, black-and-white "wands" for the twin-track cycleway, badly placed London Plane trees, road markings (with more signs "announcing" them), thick grey steel poles carrying the Luas catenary and a miscellaneous grouping of utility boxes on its southern edge that were dubbed "Luashenge" after they were installed. Any visitor to Dublin viewing this appalling mess would never imagine that the Council had a public realm plan, or indeed, any idea at all about what's appropriate in the urban environment.

The draft city plan contains an objective (CCUVO13) to "implement a programme of environmental and public realm improvements along the Grand Civic Spine from Parnell Square to Christchurch Place and along the city quays, and to prioritise the redevelopment of College Green as a pedestrian friendly civic space including the pedestrianisation of Foster Place". When this will actually happen is anybody's guess. More than two years have passed since the DCC's €10 million plan to transform College Green into a civic plaza was turned down by An Bord Pleanála, mainly because of its negative impact on bus services, and all that has happened since was a public consultation on extending the pedestrian plaza along Dame Street to the junction with South Great George's Street. [Chapter 7: The City Centre, Urban Villages and Retail](#)

Routine maintenance of certain bridges across the River Liffey is deplorable. The opaque glazed panels on seats placed on Grattan Bridge 20 years ago are repeatedly targeted by graffiti vandals, and their "tags" are often left there for weeks or even months before being cleaned off. The same is sadly true of bronze handrails on the Millennium Footbridge. Although the Dublin City BID, We Are Dublin Town, effectively deals with graffiti in the areas under its remit, this form of criminal damage is endemic in the Temple Bar area and also on Grattan Bridge and the

Millennium Footbridge.
[Chapter 12: Culture](#)

A major distinction must be drawn between graffiti “tagging”, which constitutes criminal damage, and street art, which the draft city plan recognises as “an important art form creating unique experiences in the city”. However, **Objective CUO37 confuses the issue by including both street art and graffiti vandalism in the same sentence.** This should be amended as follows: “To continue to support Street Art as an art Form in the city and to commission new street art at agreed locations to enliven the city



DELETE and to address areas subject to tagging and vandalism RESUME and to support the use of construction hoardings as locations for new installations. **INSERT** The Council will **maintain civic facilities, including bridges across the River Liffey, in a presentable condition by dealing promptly with graffiti attacks and taking measures to seal vulnerable elements with a proprietary coating, thereby making them easier to clean”.**

In relation to Section to 8.5.3 of the draft city plan, Policy SMT8 relating to public realm enhancements should be amended as follows: To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council’s Public Realm Strategy (‘Your City – Your Space’), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan **INSERT the Temple Bar Public Realm Plan RESUME** and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area. [Chapter 8: Sustainable Movement and Transport](#)

I very much welcome Objective SMT022 “to work with other public bodies to examine opportunities to repurpose surface parking throughout the city for greening and to support the proposal to re-establish the park at the front of Leinster House”. **However, this should be expanded to target all off-street surface car parking in the city centre, notably including large areas of commuter car parking provided free of charge to public servants, such as those employed by Dublin City Council itself — for example, on a site previously occupied by the Fish Market, near the Four Courts. This will presumably be addressed in the Markets Area plan.**

Section 10.5.8 of [Chapter 10: Green Infrastructure and Recreation](#), contains Objective GIO53 “to support the development of a public lido and other facilities to provide water sports and leisure activities in the City Centre”. **I would propose adding a specific objective, as follows: “and to work with the George’s Dock Lido group to advance plans for the provision of a public lido, open throughout the year, in the basin of George’s Dock, as a suitable recreational use for this important protected structure”.** As councillors are well aware, the dystopian whitewater rafting facility previously proposed for this site by DCC’s chief executive has now been abandoned, while the historic dock basin is devoid of water and now constitutes a major eyesore in the IFSC.

As a resident of Dublin city centre since 1995, I welcome the transportation objective to reduce the modal share of private vehicles from 29% in 2019 to 17% in 2028, with a corresponding

increase in the modal share of public transport from 54% to 57%, with the remaining 26% taken up by walking, cycling and “micro mobility”. Also very welcome is Policy SMT 26 “to support the repurposing of multi-storey car parks for alternative uses such as central mobility hubs providing high density bike parking, shared mobility services, ‘last mile’ delivery hubs and recreational or cultural uses”. All of these policies would help to point Dublin in a more sustainable direction.

Chapter 8: Sustainable Movement and Transport

Councillors will be aware that there is an increasing demand for the pedestrianisation of more streets in the city centre and that this has run into obstacles, as in the case of South William Street, most of which cannot be excluded to through-traffic due to the location of Brown Thomas car park, which exits onto the street. This was one of many multi-storey car parks that were built on foot of an ill-considered tax incentive introduced by the 1995 Finance Act. **I would propose that Policy SMT26 of the draft city plan be amended to include a specific objective to remove the multi-storey car parks that are standing in the way of pedestrianising streets.**

As someone who grew up off Glenbeigh Road, I find it depressing that Blackhorse Avenue is still included among the Road, Street and Bridge schemes listed in Objective SMT023, as it has been in successive city plans dating back at least to the 1980s. As road engineers would see it, the railway bridge on Blackhorse Avenue represents a “choke point” for traffic because of its relative narrowness. But I would argue that this makes it safer, rather than dangerous, because motorists need to slow down as they approach the bridge. The envisaged road-widening scheme would also shear off front gardens of houses flanking Glenbeigh Road that date from the late 1930s, gravely damaging their setting. **Accordingly, I would strongly urge councillors to omit Blackhorse Avenue from the list of road-widening schemes.**

8. Conclusion:

Temple Bar Residents have made a detailed submission on the draft Dublin City Development Plan 2022-2028, to which this writer contributed; indeed, sections of it are included in my own submission. **I would call on councillors to consider the issues we have raised very carefully. Those of us who live in the area know all about the trials and tribulations of dealing with entertainment noise outbreak from bars and nightclubs as well as alcohol-fuelled anti-social behaviour. With a reform of the licensing laws likely to permit bars and nightclubs to remain open as late as 6am, these problems will be exacerbated unless steps are taken to protect the residential community in the area; otherwise, Temple Bar is in danger of becoming uninhabitable.**

The ideal of living in the city **must not be squandered on the altar of profit**, whether of publicans, nightclub operators, hotels, illegal short-lets of “entire homes” via Airbnb and its ilk, or BTR investment funds. I agree strongly with former DCC senior planner Paul Kearns’ view that the reason why the city centre was left “nakedly exposed” by the Covid pandemic, compared to many other European cities, was that “Dublin has, for far too long, favoured the temporary, often fleeting visitor over the local urban resident. A city that prioritises suburban shoppers, daily commuters and the spending power of international tourists over sustainable, mixed-income and family-friendly living at its centre is now – in the era of Covid-19 – reaping the rewards of its anti-urban living policies”.

In this context, the draft development plan’s proposal that BTR “should be concentrated in prime inner city areas” represents the ultimate betrayal of proper planning and sustainable development in Dublin. BTR was always envisaged as catering for an “increasingly mobile workforce” and, therefore, it simply cannot provide the building blocks for the creation of sustainable residential communities. DCC’s planners have recognised that a mix of housing tenure is more desirable, which is why they have proposed that a minimum of 40 % of standard build-to-sell apartments will be required in any scheme that contains more than 100 BTR units. But this would not apply in the inner city, where a BTR “free-for-all” is provided for in the current draft. **In my view, given that barely more than 17% of purpose-built apartments throughout Dublin City are owner-occupied, this would be an unmitigated disaster.**

DCC’s chief executive was quite correct in describing the 100% BTR scheme for Clonliffe College in Drumcondra as “a major missed opportunity to create an integrated, mixed income, mixed ownership and sustainable new community with a full range of apartment types and sizes.”

Yet city planners are prepared to write off mixed tenure with a full range of apartment types and sizes in the inner city as well as in SDRA-designated areas, with the exception of The Liberties and the North Inner City. **This is totally unacceptable and should be rejected out-of-hand by elected members of Dublin City Council. The inner city must be cherished, not dumped on.**

As I noted in *A Little History of the Future of Dublin*, there were nearly 269,000 people living in the egg-shaped area between the Grand and Royal canals in 1926, accounting for 85 per cent of the city's population then. Over succeeding decades, the inner city's population declined relentlessly in census after census, reaching a rock-bottom figure of just over 84,000 in 1991. Over succeeding years, as more and more people were attracted by the idea of city living, aided by urban renewal tax incentives, the population of Dublin's core increased to 112,000 in 2001 and continued rising to almost 136,000 in 2011. **This historic shift needs to be built on and reinforced, rather than left to wither hopelessly on the urban vine.**

Although the resident population of the inner city has declined in recent years due to the widespread illegal conversions of apartments and houses into tourist short-lets, I would urge councillors to **set an explicit target in the draft development plan to increase the population of Dublin's urban core to 250,000 by 2050, if not sooner**, by facilitating the construction of new apartment buildings of up to six storeys in height — identified as the “default objective” for the city centre — as well as the conversion of as many vacant buildings and upper floors as possible for residential use. **Numerous other European cities have done this very successfully over the years, and that's why their core areas are thriving rather than languishing in the doldrums.**

No doubt the Planning Industrial Complex has been working overtime in recent weeks preparing submissions on the draft Dublin City Development Plan 2022-2028, in which they will argue that there should be no restrictions at all on the proliferation of this seriously flawed housing typology. Councillors should not be fooled. Hopefully, most of them realise that BTR is designed to trap as many younger people as possible on an exorbitantly expensive rental treadmill, with upward-only rent reviews to provide the requisite high level of profit for private equity funds and other “institutional investors”. **BTR is a bogus “solution” for the housing crisis, which in Dublin's case is essentially a crisis of housing affordability.**

It doesn't even matter whether or not BTR apartments are actually occupied, as long as their capital value increases year after year. **The tallest residential tower in Dublin, 22-storey Capital Dock at the end of Sir John Rogerson's Quay, contains a total of 190 apartments and was completed in January 2019. Yet a third of these apartments remain vacant three years later, even in the midst of the housing crisis.** Why? Because the quoted rents are far too high — nearly €3,000 per month for a one-bedroom unit, €4,000 for a two-bed and €5,000 for a three-bedroom apartment: €60,000 per year, significantly more than the median annual income in Ireland. And the vacancy rate at Capital Dock doesn't matter because its capital value continues to rise.

All cities are shaped by market forces. The primary function of the planning system is to mediate these forces by providing a framework for development, in the public interest. As Section 1 of this submission shows, An Bord Pleanála has thrown “proper planning and sustainable development” out the window by rubber-stamping so many appalling schemes in recent years. **It is now time for Dublin City Council to reassert the primacy of the public interest in planning for a more environmentally sustainable city.**

Yours sincerely,

Frank McDonald