

## **Redacted - Personal Information**

### **Development Plan Team**

Dublin City Council

Civic Offices

Dublin 8

21 February 2021

### **Re: Dublin City Draft Development Plan 2022 - 28**

Dear Sir/Madam,

Cities are major players in the overall development of regional, national, and international economic systems. Cities contain most of the people, most of the infrastructural development, most of the jobs, and most of the consumption of a nation. Most cultural and recreational facilities are also located in cities. So, the Dublin City Development is of critical importance locally, regionally and nationally and its proposals should reflect genuine planning guidelines and aspirations. It forms a contract with the citizens to develop their City in line with these guidelines.

#### **Theme 1      Density and Height**

I know that there is a thrust to improve density but this need not be done by the 'high-rise' option. High-rise cities can be an insidious form of overdevelopment driven by extreme capitalism. As buildings are inherently more expensive to construct, high-rise is most suitable to luxury condos, and the vast profits obtainable inflated adjacent land prices. An emphasis on high-rise increases inequality. The uniqueness of Dublin is its scale, with big skies and the sight of the mountains at the end of the road. We can increase density and 'maximise' its potential without destroying that quality. Cities such as Barcelona, Rome, Helsinki, Paris and Berlin are distinguished by their high densities of development, but most of these cities are only six floors high, and the high-rise element is generally limited to small parts of the city. We should revel in our comparatively low-rise silhouette of slate rooftops and chimneys.

#### **Theme 2      Climate Action**

##### **Using Renewable Energy**

Insulation, triple glazing and air to heat are all technologies known and in use. We need to look at building passive housing. Michael Bennett & Sons have built and sold 3-bed passive houses (102 sqm) in Wexford for €170k in 2015 and Durkin has built passive houses in Citywest. Dun Laoghaire-Rathdown with Sisk has built 12 homes (2018) to 'nZeb' standards (2018).

The cost of photovoltaic panels has reduced dramatically - far more quickly than expected and no new houses should be built without them. There seems to be an industry resistance to their use. If you can produce your own electricity you will buy less from government funded wind generation. We need this additional source which does not involve additional land and does not impinge on our visual environment. It will also give a 'push' towards electric cars.

On 3 December 2020 there was a new peak demand for electricity in Ireland at 5,112MW and while each house would be producing a small amount of electricity - every little helps. The ESB impose a limit of 6kw of electricity to be generated or you must have 3 phase in your home - same as a factory. They do not currently allow the householder to sell electricity back to the grid. This will change so we must allow for this change in housing and also prepare for new sub-stations which will be needed and incorporated in planning.

### **Theme 3      Quality Housing and Sustainable Neighbourhoods – providing quality housing and sustainable neighbourhoods.**

#### **DESIGN**

**Design has to be an important feature of our planning.** It is as easy to design a 'good' building as a 'bad' building. We have higher standards for our housing and these should be mandated. How much of new housing currently takes into account daylighting, noise, storage, facilities for waste and recycling, and possible pollution inside the building resulting from insulation and heating systems?? These issues really come into focus when building apartments. How often do we see developers obtaining planning permission for a development, commence building and then submit applications for 'nip and tuck' alterations on a regular basis. These alternations are most often at the expense of the quality of the development for the user or viewer.

Covid 19 has impacted our lives and taught us many things about our environment and many of those were to do with our homes. Lockdown was more uncomfortable for those in apartments with no balconies. *The London Housing Design Guide* published 2010 by the Mayor of London forms a common set of design standards across the whole of London and deals with this very issue. Balconies are now mandated for new apartment builds for London housing under their 'Lifetimehomes' policy.

#### **BALCONIES for Apartments**

- Min 5 sqm for a 2 person flat + 1sqm per additional occupant
- Min 1500x1500mm space. Dimensions aim to provide space sufficient for a meal around a small table, or to sit outside with visitors.
- Level, watertight threshold with up-stand max 15mm height - exemptions for thermal insulation
- Balconies should have solid floors draining to downpipes
- Where balconies overlook noise sources use of absorbent materials for acoustic benefits
- Occupants need to have external recreational areas in which they feel safe and which they see as within their "ownership."
- Consideration to be given to privacy, shelter and 'Secured by Design'

#### **CEILING Heights**

We have seen our homes become a place of retreat and to this end I do feel that the minimum finished floor level to finished ceiling level should be raised to a minimum of 2.6m and taller ceiling heights should be encouraged. Dermot Bannon has shown us the positive impact on living of additional internal height as an increase in ceiling height can make the difference between a home feeling cramped or generous.

It is great to see the 'South Georgian Dublin Townhouse re-use Guide' published by the Conservation Department which shows the possible and is in the spirit of a life-time home.

## **Theme 7. Green Infrastructure, Open Space, Recreation and Natural Heritage**

We must resist the commodification of the public space. We have seen how we gravitate to shared public spaces in times of crisis: spaces that aren't trying to sell us anything; spaces where we can escape, be simultaneously together and apart. With space to form ideas and walks to clear the anxious mind. A park is defined as much by its landscaping as by its surroundings and developers should not be allowed to surround its perimeters with high rise buildings and use its trees and greenery to increase the value of its development. This is evident at Herbert Park and along the Grand Canal. (I note that you have used a picture of the canal at Section 3). We need to treasure our natural heritage. We see Paris renovating the Tuileries Garden to make it less dusty, more shadowy and bird-rich. We need to mind our trees. We are now aware of the usefulness of front gardens, providing both breathing space and leisure activity. Given the change in our weather patterns - extremely heavy rainfalls - these same gardens now provide essential run-off. For these reasons front gardens should not be turned into car parking and this should be included in the Development Plan.

## **Theme 8 and 9 Heritage and Culture**

The richness, scale and diversity of the earlier urban environments are being lost to the internationally styled buildings of today. It is essential to preserve and refurbish the historic areas and protect the architecture of the past from premature development or destruction. Our built cultural heritage has a significant richness which must be protected, I would like to see the retention of the residential quality of the neighbourhood that is the original Pembroke Estate. It was laid out in the mid 1800s, and is a coherent grand design of a 19th Century initiative combining, as it does, urban living with green space, and should be equally recognised with the adjoining Georgian Core.

Thank you.

Yours faithfully,

Susan McCarrick