



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Review of the Dublin City Development Plan 2016-2022 and Preparation of a New City Development Plan 2022-2028

Chief Executive's Report on Pre – Draft Consultation Process

**Report to Council under Section 11 (4) of the
Planning and Development Act 2000, (as
amended).**

19th April 2021

Report No. 133/2021

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Foreword: Background and Format of Report

Background

Dublin City Council (DCC) is in the process of preparing a new City Development Plan for 2022-2028. The first stage of the process was the pre-draft consultation, where notice was given that the City Development Plan, 2016-2022 is to be reviewed and a new plan made for the City. A copy of the public notice is contained in Appendix 1. The pre-draft consultation was undertaken over an 8 week period from the 15th of December 2020 to the 22nd of February 2021 and written submissions or observations were invited with regard to the review.

The review takes up to 2 years and will conclude with the adoption of the final City Development Plan 2022-2028 towards the end of 2022. In total, three phases of public display and wide ranging consultation will take place throughout the two year process. The consultation at this stage is strategic in nature and the public were asked to consider high level, big picture issues based around a number of key themes that will be considered in the plan. At this stage of the plan making process, submissions relating to the zoning of land are not considered. Such submissions can be made at the draft plan stage which is scheduled to go out to public consultation in November 2021.

This report contains a summary of the issues raised in the submissions received and the Chief Executives response to same. The Chief Executive's Report also provides an opinion and recommendations based on the issues raised in the submissions.

The structure of this report is set out in the Planning and Development Act, 2000 as amended (Section 11(4)(b)). The report must be submitted to the Councillors for their consideration. The Councillors have up to 10 weeks to consider the Chief Executive's report. The report shall be published on the Dublin City Council website as soon as practicable following its preparation.

Following consideration of this report, the members of the Planning Authority may issue directions regarding the preparation of the draft plan. In accordance with Section 11(4)(d) of the Act, any such directions shall be:

- strategic in nature,
- consistent with the draft Core Strategy,
- shall take account of statutory obligations of the Local Authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government.

The Chief Executive shall comply with any such directions.

In issuing directions, the members are restricted to considering the proper planning and sustainable development of the area to which the development plan relates.

After this stage, the draft development plan will be prepared and submitted to the Councillors for their consideration. This is scheduled for late November 2021.

Overall, the level of engagement at this stage was very high and 752 submissions were received from the public.

Dublin City Council wish to take this opportunity to sincerely thank all those who made submissions, all those who gave of their time to attend the on line webinars, and engaged with officials and also the Councillors, for their contribution to the overall process.

Format of this Report

As set out in the Table of Contents page, this report comprises 4 parts for ease of reference:-

- Part 1** Introduction to Report, comprising legislative background details of public consultation, and Executive Summary (page 23)
- Part 2** Summary of Submissions received from The Eastern Midlands Regional Assembly, The National Transport Authority and the Office of the Planning Regulator, and the Chief Executive's Opinion and Recommendations
- Part 3** Summary of Submissions across the 10 themes, followed by the Chief Executive's Opinion and Recommendation on the theme. Note that each theme is prefaced by a list of the submission numbers relevant to that theme. If seeking to identify which Submission Number and Name relates to which Portal Reference Number, please see Appendix 3 (page 195 – 213 page)
- Part 4** Appendices 1 - 7

For the purposes of this report, the term 'current plan' refers to the City Development Plan 2016-2022 and the term 'draft plan' refers to the Draft City Development Plan, 2022-2028.

This report is submitted to the Councillors of Dublin City Council for their consideration.

Part 1: Introduction to Chief Executive's Report

Legislative Background

This report forms part of the statutory procedure for the preparation of a new City Development Plan. It reports on the first of three phases of public consultation over the two year plan making process. The next stage of public consultation will involve the display of the draft plan in November 2021, whilst the final stage will be the display of amendments to the draft plan.

The Planning and Development Act 2000 as amended, provides for public involvement at the strategic policy formulation stage of the plan preparation process, prior to the preparation of a draft plan. This earlier involvement provides an opportunity for all of the stakeholders with an interest in the development of the city to have a greater sense of ownership on the final Dublin City Development Plan 2022-2028.

Under the Act, is a requirement for the Chief Executive to prepare a Chief Executive's Report on the submissions/observations received and matters arising out of any consultation undertaken. The report must respond to the issues raised and make recommendations on the policies to be included in the draft plan. The legislation also requires that all of the foregoing must be considered against a background of national policy, guidelines and standards.

Section 11 (4)(a) of the Planning and Development Act, 2000 (as amended), sets out the requirements in relation to the preparation of a Chief Executive's Report. The Chief Executive's Report is required to deal with any submissions or observations received on foot of the notifications and consultations (carried out under Section 11 (2) and (3) of the Act), with, inter alia, the public, prescribed bodies, service providers and the Board.

In accordance with Section 11 (4)(b) the Chief Executive's Report must:

(i) List the persons or bodies who made submissions or observations, as well as any persons or bodies consulted.

(ii) Summarise the issues raised in the submissions and during the consultations, where appropriate, but shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose.

(iii) Give the Opinion of the Chief Executive on the issues raised. In this regard, the Chief Executive's opinion must take into account:

- (a) the proper planning and sustainable development of the area,
- (b) the statutory obligations of any Local Authority in the area, and
- (c) any relevant policies or objectives of the Government or any Minister of the Government.

(iv) Finally, the Report shall state the Chief Executive's Recommendations on the Policies to be included in the Draft City Development Plan.

The Chief Executive's Report must then be submitted to the Councillors of the Planning Authority or a committee of the Planning Authority for their consideration.

Following consideration of the report, the members may then issue directions to the Chief Executive regarding the preparation of the Draft City Development Plan (Section 11(4)(d)). These directions shall:

- be strategic in nature,
- be consistent with the draft Core Strategy and
- shall take account of the statutory obligations of any Local Authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

Section 12(18) of the Act defines statutory obligations:

“statutory obligations includes, in relation to a local authority, the obligation to ensure that the development plan is consistent with –

- (a) *the national and regional development objectives specified in –
(i) the National Planning Framework, and
(ii) the Regional Spatial and Economic Strategy, and*
- (b) *specific planning policy requirements specified in the guidelines under subsection (1) of section 28.”*

In issuing directions, Section 11(4)(f) of the Act states that the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates. Any directions shall be issued not later than 10 weeks after the submission of the report.

After this stage, in accordance with Section 5(a) of the Act, the Chief Executive shall, not later than 12 weeks following the receipt of any directions, prepare a draft development plan and submit it to the members of the planning authority for their consideration.

Overview of Pre-Draft Consultation Process

Description of Notification Procedures/Consultation Process

The pre-draft consultation stage ran from the 15th of December 2020 until 22nd February 2020. A pre-draft plan Public Consultation Strategic Issues Paper was published and made available at the City Council Offices (by appointment) and on a dedicated web site – www.dublincitydevelopmentplan.ie. In addition to the Issues Paper, a summarised, National Adult Literacy Agency (NALA) approved, plain English version of the 'Strategic Issues Paper' document was published on the web site and made available to the public. Both documents were also available through Irish. Two background research papers were also published regarding (i) Height and (ii) Retail. This informed the public consultation process. The launch of the pre-draft consultation stage was advertised by way of statutory newspaper notice as well as extensive social media use.

It should be noted that this consultation process took place during Level 5 restrictions for the Covid-19 Pandemic which placed significant constraints on the more traditional consultation process; particularly public meetings, workshops and hosting public displays. To address this, the communications strategy for this stage was framed to focus on intensive use of social and traditional media to engage with people and by hosting and attending a number of events, webinars and presentations online.

Below is a summary of the initiatives employed during the public consultation process:

(1) Elected Member Workshops: Two non-statutory briefing workshops for all Councillors were held on the 19th and 23rd of November 2020 prior to the commencement of the review process. The first workshop was to explain the process of making the Dublin City Development Plan and key legislative considerations. The presentation from this workshop was circulated to all Councillors. The second workshop was to get the initial views of the Councillors on key themes and issues to be considered in the review of the plan. A summary of the key issues raised was circulated to all Councillors after the conclusion of the workshop.

Alongside this, a series of presentations on the Pre-Draft consultation process and on the role of the Development Plan was given to all SPCs and a selection of other groups such as SPC sub-committees, PPN Secretariat, Docklands Forum, Moore St., Women's Councillors Group, NEIC sub-group, with the aim of widening the understanding and meaning of the Plan to those represented at each.

(2) Issues Paper: A Strategic Issues Paper was published and available on line on the dedicated development plan web site and consultation portal. The document included engaging infographics and photographs. The purpose was to create a visually appealing document, reaching out to all that read it.

A summarised, NALA (National Adult Literacy Agency) approved plain English version of the 'Strategic Issues Paper' document was published on the web site and made available to the public. Both documents were also available through Irish.

Two background research papers were also published regarding Building Height and Density and a Consultant's Report on the Role and Function of Retail in the City Centre. The purpose of these documents was to engage discussion and help inform submissions on the plan.

(3) Statutory Notice: Publication of newspaper advertisement in the national press inviting written submissions.

(4) Branding: From the outset of the review process, the City Council used the services of its professional design and print company to develop a branding theme for the plan. This branding and colour theme has been used in all of the public consultation documentation and media to ensure consistency and a brand identity for the plan.

(5) Targeted Distribution and Communication with Organisations and Networks: Distribution of link to the dedicated website and information regarding the pre draft consultation phase was sent to individual residents' associations, community groups, business interests and other stakeholder organisations.

(6) Website: A dedicated website was set up for the development plan review process – www.dublincitydevelopmentplan.ie. There were 11,277 hits on the website during the public display period

(7) Submissions Portal: The submissions portal was accessed through the dedicated website and was created to be user friendly. However, recognising that not all are familiar with technology, submissions were also accepted by post.

All submissions (including attachments) are available online. This enables members of the general public, and others, to view each submission electronically.

(8) Outdoor Advertisements: A wide number of bus shelters, big belly bins and large poster advertising stands in high profile locations with a good geographic spread across the city were selected for outdoor advertising. Eye catching posters were specially designed to be erected in these locations to bring the development plan review process to the attention of as wide an audience as possible during the consultation period. The posters were displayed on 35 bus shelters, 56 Big Belly Bins, 22 Digipanel and 20 Metropole stands between the 10th January and 22nd February 2021. The Big Belly Bins in St. Patrick's park were also utilised.

Posters were also erected in all public libraries. However, in December 2020, all public libraries closed due to level 5 Covid restrictions. Public libraries however, continued to advertise the consultation phase through their social media channels.

(9) Media Engagement and Campaign: The City Council's PR Company assisted with the launch of the development plan review, to enhance public awareness of the review process and promote the development plan webinars. At the outset, a

strategic communications workshop with the Dublin City Council planning team and communications team was established, to set objectives for the communications campaign, identify the various audiences and stakeholders and develop key messages.

In December, to launch the campaign, a photocall was organised with Dublin's Lord Mayor Hazel Chu and Dublin primary school children. The accompanying press release centred on the messaging that this new Development Plan is for all age groups and that it is important that everyone has their say and makes a submission. It also highlighted how to make a submission and encouraged citizens to tell Dublin City Council what they love about the City and how they think it can be improved. The City Planning Officer and the Deputy City Planner at Dublin City Council were the spokespeople for the campaign. A social media content plan was also developed to coincide with the launch date of December 15th 2020. The press release and photographs were issued to all national, Dublin regional and digital news outlets.

A video was also produced with Dublin's Lord Mayor highlighting the launch of the Review of the Development Plan and Strategic Issues Paper. The video was promoted on social media and used as a media asset for online news journalists. The media campaign resulted in considerable engagement and publicity regarding the launch of the review.

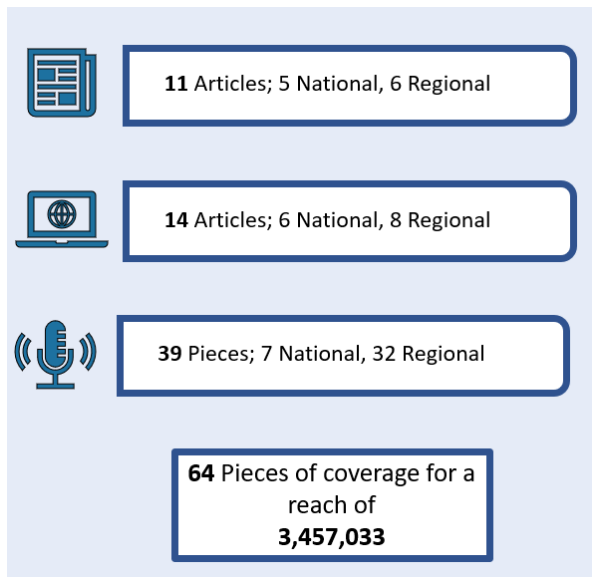
In order to promote the Development Plan webinars (see below for further detail), a second press release was issued to media in January 2021, promoting how to register for the events and reiterating the February 22nd deadline to make a submission. A social media content plan was created to promote the webinars through the Dublin City Council social media channels.

The printed media was also used to disseminate information on the public consultation process.

Exclusive and proactive media coverage was achieved including a full page spread on Page 6 of the Sunday Business Post, a half page article in the Irish Times, interview on the Pat Kenny Show on Newstalk, a 10 minute interview on Newstalk Breakfast, interview on Newstalk Lunchtime Live, Today FM, Newstalk Newsroom. There were further interviews with Dublin's 98FM, FM104, Q102, Sunshine 106.8, Classic Hits, Radio Nova, Spin 103.8, Dublin Gazette and the Herald. There was also a podcast on the 14th of January 2021.

<https://open.spotify.com/episode/0LJu81pL2ce7VxAtk06cJ3?si=v8vSp7FjRqyUozPcxUUFzA>

The Communication Output achieved 64 pieces of media coverage with an estimated reach of 3,457,033.



(10) Social Media Campaign and Development Plan Video: This involved a series of targeted ‘press releases’ via social media (using Instagram, Twitter & Facebook). An engaging subtitled video was also prepared inviting the public to make a submission, and this was circulated through DCC social media channels.

For clarity, ‘Impressions’ means the number of times people saw the tweet/post and ‘Total Engagement’ means the total number of people who interacted in some way with the Tweet/post who shared or commented on the post. ‘Reach’ means the number of people reached by the post/tweet. To date there have been:

Twitter: over the 8 week public consultation there were a total of 409,265 ‘impressions’ with a ‘total engagement’ of 5,655. 496 ‘retweets’ were made and there were 583 ‘likes’.

Facebook: The Facebook posts had an overall reach of 95,571 people, with 4,317 of these resulting in total ‘engagements’.

Instagram: The Instagram posts had an overall reach of 17,223 people.

LinkedIn: 36 likes and 368 views.

Councillors were also encouraged to engage in this process disseminating information across their social media accounts and to their constituents. Guidance notes and email reminders were issued to the Councillors asking them to share information about the public consultation process.

(11) Webinars: 5 consultation webinars were organised and held on the 25th and 26th of January 2021. These were based around a number of core themes including:

- City Economy and Retail
- Housing and Community
- Heritage and Climate Action
- Movement and Transport
- Green City and Sustainable Infrastructure

Each webinar comprised two key note presentations and then a live Question and Answer session with a panel of speakers. The purpose of the webinars was to facilitate broad discussion on core issues to be addressed in the next development plan. The issues raised during the webinars will be considered in more detail in the preparation of the draft plan.

Attendance at the webinars was high and there was a lot of engagement and questions from the public. The number attending each event and the questions posed are summarised below.

- Housing and Community: 241 attendees and 107 questions posed.
- Heritage and Climate Action: 224 attendees and 83 questions posed.
- Movement and Transport: 261 attendees and 86 questions posed.
- Green City and Sustainable Infrastructure: 215 attendees and 64 questions posed.
- City Economy and Retail: 86 attendees and 16 questions posed.

All of the webinars were recorded and fully subtitled and were made available to view on You Tube post the event to facilitate anyone unable to attend. Links to the webinar recordings were highlighted on the public consultation portal and website and extensively across social media. They can still be accessed through the dedicated website at www.dublincitydevelopmentplan.ie

Following the webinar events, there was extensive public interest with 1,978 views on the DCC YouTube Channel. Each webinar had the following number of views on You Tube.

- Housing and Community: 345 views
- Heritage and Climate Action: 192 views
- Movement and Transport: 272 views
- Green City and Sustainable Infrastructure: 791 views
- City Economy and Retail: 323 views
- Advert: 55 views

(12) Poster Competition: A Poster Competition was organised for young people to encourage their engagement in the development plan process. The Lord Mayor invited school children in the senior primary cycle (3rd to 6th class) to create a poster of their vision for the city. Details of the competition “My Vision for Dublin...” were forwarded to all schools in the Dublin City Council administrative area. The school children were encouraged to enter posters either using a combination of words and illustrations or just words or illustrations. The competition was promoted through the Libraries, the Arts Office and the Dublin City PPN. The competition was also promoted through use of social media and radio as well as on the RTÉ news2day programme. The competition was ongoing at the time of writing.

(13) Digital Bulletin and Staff Awareness: Information regarding the development plan was issued in the City Council’s Digital Bulletin which is circulated to staff and Councillors of the organisation, including those who have retired.

(14) Comhairle na nÓg: Comhairle na nÓg which means Youth Council, provides young people with an opportunity to discuss and debate matters of relevance to them and their community. There is a Comhairle na nÓg in each of the 31 local authorities of the country. Dublin City Comhairle na nÓg has 47 members aged 12-17 years. Through Comhairle na nÓg young people are encouraged to speak out and have their voices heard around various topics.

Dublin City Comhairle na nÓg were invited to participate in a workshop to help inform the issues paper before it was finalised for public display. However, the timing was not suitable as it clashed with their annual general meeting and integration of new members. In the meantime members were kept informed of the consultation process and how to make submissions. They were also encouraged to participate in the children's poster competition where appropriate and to disseminate the information to their friends, schools, youth groups and families. A workshop was then held over Zoom with Dublin City Comhairle members, they brought forward their views on the type of city they want Dublin to be.

Issues raised during the discussion included:

- The importance of developing more housing in the city.
- The need to address climate action including measures to reduce flooding, promote renewable energy, promote electric cars, enhance greening and protect biodiversity.
- The importance of parks, green spaces and the public realm and the need for enhanced facilities for play and for teenagers.
- Sustainable transport and the need for well-connected cycle infrastructure and safe zones around schools and potential for e-scooters in the city.
- Importance of green roofs, green walls and attractive new architecture.
- Importance of local retail facilities.
- Need for enhanced sports and recreational facilities for the city and places for young people to hang out.
- The importance of protecting our older buildings and built heritage.
- The Dublin City Comhairle members also voiced their appreciation for the city including its many parks.

These issues will be considered in the drafting of the plan.

(15) Your Dublin Your Voice: An online survey with Your Dublin Your Voice was carried out between the 11th and 19th of February 2021. *Your Dublin, Your Voice* gives Dubliners a unique opportunity to provide opinions and views on what they love, like and would be glad to see improved in the capital region. As the first local government-led online opinion panel in Ireland, it seeks feedback and suggestions, via online surveys, on a range of issues that impact on the quality of life in Dublin.

1,053 respondents from the "Your Dublin, Your Voice" opinion panel responded to the survey. The survey asked respondents a number of key questions relating to the Development Plan including what they felt were the top 5 issues facing Dublin over the next number of years. Respondents were also asked about the 15 minute city. A summary of the key results is presented in Appendix 7 and the full survey results can

be viewed at the following link <https://www.dublincity.ie/business/economic-development-and-enterprise/economic-development/your-dublin-your-voice>.

Challenges and Opportunities

There are many challenges to be addressed in the city for the next 6 years.

Covid 19 is a global pandemic which is likely to have significant economic impacts for the city in the short to medium term. The longer term impacts on the city's economy are as yet unclear; however, ongoing restrictions in terms of international travel may restrict the movement of both labour and capital between countries, thus having implications both for new FDI and for mobile workers. There may also be long lasting implications for some sectors such as discretionary retail, tourism, hospitality and personal services. There is also likely to be implications for the office market and for third level institutions and the international student market. It is acknowledged however, that the plan provides for the longer term development of the city over a 6 year period from 2022- to 2028. The Covid crisis will create opportunities and stimulate different ways of thinking about the future development of the city and what the core priorities are to ensure that Dublin is a place where people want to live, work and invest. Policies and objectives in the plan will focus on ensuring that the city facilitates economic recovery post Covid as well as measures to ensure the vitality and viability of the City Centre is promoted.

In terms of public consultation during the pre-draft stage, Covid also meant that more traditional methods of face to face engagement had to be augmented. As can be seen from the fore mentioned summary of the consultation strategy, there was a significant emphasis on digital tools as well as innovative measures such as the series of online webinars. Dublin City Council is satisfied that the pre-draft consultation strategy was successful and engaging with the citizens of Dublin. 752 submissions were received over the 8 week consultation period which represented a 150% increase on the same stage of the process for the last development plan period when 302 submissions were received.

The NPF includes the requirement to prepare a Housing Needs Demand Assessment (HNDA) to inform the Housing Strategy that will address the housing needs of our growing city. This is an evidence based tool to provide detail in respect to the mix of residential unit type required. The MASP requires the HNDA to be prepared jointly by the Metropolitan Local Authorities of which DCC is one. Section 28 Guidance on Development Plans and the HNDA is due to be published. The development of appropriate methodology to enable such a regional HNDA to be completed may not align with the preparation timeframe for the City Development Plan and in this regard, the plan may need to be varied in the future once full guidance to enable a regional approach to be prepared becomes available.

At the time of writing, publication of new Development Plan Guidelines is pending. While every effort will be made to incorporate new guidelines into the preparation of the draft plan, this may not be possible within the statutory timeframes which have to be met.

There are a number of other policy areas where legislation is evolving including marine planning, strategic energy zones and decarbonisation zones. Appropriate policy on these issues is included in the plan based on current guidance available.

Next Steps

The Councillors must consider this report and submit motions by the 14th of May 2021. A report on the motions will be prepared and circulated to Members by the 4th of June and will be considered further at a special meeting on the 22nd of June.

Members will be invited to attend a workshop in early May to be further briefed in relation to the review process; outcomes of the consultation, and guidance relating to submitting motions. There will be an opportunity to discuss the contents of the Chief Executive's Report at these meetings and the approach to motions.

Not later than 12 weeks after the consideration of the Chief Executive's Report and the issuing of directions by members, the Chief Executive is required to prepare the Chief Executive's Draft Plan for consideration of the members. It is envisaged that the Chief Executive's Draft Plan will be submitted to the members on the 20th September 2021 for their consideration. The members are required to consider the Chief Executive's draft plan within 8 weeks of its submission to them and approve the draft plan to go out on public display.

Within 2 weeks of consideration of the draft plan by members, the Chief Executive is required to publish notice of the preparation of the Draft Dublin City Development Plan 2022 – 2028 to go out on display in November 2021. The Draft Dublin City Development Plan will be on public display for a period of 10 weeks from the end of November 2021 to mid-February 2022.

Full details of the development plan timeline are set out in Appendix 5.

Strategic Planning Policy Context

The new Draft Dublin City Development Plan is being prepared at a point in time when there has been significant evolution of policy as set out in the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) and the Metropolitan Area Spatial Plan (MASP).

National Planning Framework

A national hierarchy of plans is now in place with the National Planning Framework (NPF) being the overarching document. The NPF influences all spatial plans from national to local levels and is supported by the National Development Plan (NDP) a 10-year strategy for public capital investment to 2027. The Regional Spatial and Economic Strategy (RSES) sets out the mechanism for delivering the NPF at a regional level. These documents are aligned in setting out an ambitious growth and consolidation strategy for Dublin City and supporting the transition to a low carbon and climate resilient region.

The NPF identifies ten National Strategic Outcomes (NSOs) for the future growth and sustainable development of Ireland to 2040 which will be a central consideration in shaping the new City Development Plan. Compact Growth is the first National Strategic Outcome (NSO). It has particular significance for spatial planning policy, requiring at least half of all future housing and employment growth in Dublin to be located within and close to the existing 'built-up' area of the City – specifically within the canals and the M50 ring which will require the progressive relocation of less-intensive land uses outside of this built-up area. This growth strategy will allow better use of underutilised serviced land and buildings, including infill and brownfield land, with more high-quality and high-density mixed-use development accompanied by enhanced amenities, education, health and social services; all supported by sustainable mobility.

The NPF also introduces a new requirement for a two-tier approach to land zoning. Tier 1 lands are serviced, and in general, part of or contiguous to the built-up footprint of an area. Tier 2 lands are not currently sufficiently serviced to support new development but have potential to become fully serviced within the lifetime of the City Development Plan. Tier 2 lands may be positioned within the existing built-up footprint, or contiguous to existing developed lands or to Tier 1 zoned lands. The NPF requires that the City Development Plan must carry out an infrastructural assessment of the required services to support new development on any Tier 2 lands, and the assessment must be aligned with the delivery programme of infrastructural providers such as Irish Water and the National Transport Authority. The NPF states that lands that cannot be serviced during the lifetime of the City Development Plan should not be zoned for development. In the current City Development Plan, all lands in the city are zoned for a variety of land uses.

Regional Spatial and Economic Strategy / Dublin Metropolitan Area Strategic Plan (MASP)

The Dublin MASP in the RSES sets out a strategic planning and investment framework for the growth of the Dublin Metropolitan area over a 12 to 20 year

horizon. Under RSES, RPO3.2 local authorities in preparing their core strategies are required to set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin City and suburbs.

The RSES comprises an integrated land use and transportation strategy for the Dublin Metropolitan Area and the entire DCC area falls within the MASP area. The MASP identifies strategic residential and employment corridors based on their current and future development capacity, their ability to deliver outcomes such as compact development, place making, accessibility to public transport, potential for economic development and the ability to deliver a reduced carbon footprint. A phased sequence for the delivery of infrastructure investment is then identified to enable the accelerated delivery of the strategic development corridors within the short term to 2026, the medium term up to 2031 (which is the life span of the RSES) and then onwards to 2040.

The Strategic Corridors and Areas of relevance for Dublin City are as follows:

Strategic Development Areas

Multi-Modal Location - City Centre within the M50

Residential: Docklands and City Centre, Naas Road, North East Inner City lands, Parkwest – Cherry Orchard, Ballymun, Ashtown-Pelletstown and St. James – Heuston Lands.

Employment: Docklands and Poolbeg, Diageo lands and St. James and Grangegorman campus, Naas Road.

DART Corridor - (North - South)

Residential: North Fringe (Clongriffin / Belmayne)

Employment: North Fringe Mixed Use Centres

Strategic Employment Lands

Multi-Modal Location - City Centre and Docklands

- Docklands, Poolbeg and North East Inner City, City Centre (Grangegorman and St. James-Diageo lands)
- Intensification of Industrial lands
- DART Corridor- (South West Corridor)
- Naas Road

Ministerial Guidelines

The Department of Housing and Local Government (now DHLGH) has produced various Ministerial Guidelines, known as Section 28 Guidelines, to inform and guide local authorities in carrying out their duties. There are a range of Section 28

Guidelines which will inform the preparation of the draft development plan and draft core strategy. Some of these guidelines including the Urban Development and Building Height Guidelines and the Apartment Guidelines include Special Planning Policy Requirements (SPPRs) which planning authorities are required to apply.

The Design Standards for New Apartments – Guidelines for Planning Authorities (March 2018) introduced SPPRs in relation to apartment design which will be incorporated in the draft development plan. The more recent Urban Development and Building Heights Guidelines for Planning Authorities, December 2018 provides national planning policy guidance on building heights in relation to urban areas. The document has four SPPRs which must be complied with. Of these, there are three relating to strategic planning in the preparation of the development plan: SPPR 1, SPPR 2 and SPPR 4 which will be incorporated into the draft plan.

In December 2020, The Department of Housing, Local Government and Heritage also published – Housing Supply Target Methodology for Development Planning – Guidelines for Planning Authorities. The guidelines are intended to assist in providing the required consistent and coherent approach to be taken by planning authorities in incorporating national and regional population and housing projections into their statutory functions. The intent is that they will assist planning authorities in appropriately integrating the strategic national and regional population parameters into their statutory planning processes, such as the preparation of their city/county development plan and the preparation of their housing strategy, informed by the Housing Need and Demand Assessment (HNDA) process. The data set out in the guidelines will underpin the Core Strategy in the forthcoming City Plan.

Draft Core Strategy

The Planning and Development (Amendment) Act 2010 introduced the requirement for a Core Strategy to be incorporated as part of all development plans. The purpose of the Core Strategy is to set out an evidence-based framework for the future spatial development of the plan area. The central focus of the Core Strategy is to provide an evidenced based approach to the quantum of land zoned for housing, employment or mixed use to serve projected demand over the lifetime of the plan. It must be demonstrated that the City Development Plan and its objectives are consistent with the population targets set out in national and regional policy.

The Office of the Planning Regulator has also been established since the last plan was adopted. One of the core functions of that office is to ensure that there is consistency in city and county development plans with national and regional planning policy and objectives. In this regard, the Planning Regulator, as a prescribed body, is charged with monitoring the preparation of development plans and is obliged to make a submission to the Planning Authority providing their views on the plan's alignment with higher level policy. The Planning Regulator has powers, in conjunction with the Minister, to issue directions to the local authority where deemed necessary.

Section 11(4)(d) of the Planning and Development Act 2000 (as amended) provides that following the consideration of the Chief Executive's Report on submissions for the pre-draft consultation stage, that the members of the Planning Authority may

issue directions to the Chief Executive regarding the preparation of the Draft City Development Plan. The legislation provides that any such directions shall be strategic in nature, consistent with the draft Core Strategy, and shall take account of the statutory obligations of the Local Authority and any relevant policies or objectives for the time being of the Government, or of any Minister of the Government. In accordance with this statutory requirement, an indicative and 'strategic' level draft Core Strategy is set out below, in order to ensure that 'strategic' directions issued by members are consistent with the parameters set by national and regional policy.

The draft Core Strategy set out below is indicative at this stage and primarily based upon the principles and strategic objectives of the NPF and the RSES with a particular focus on the strategic approach set out in the MASP. It is highlighted that the extent to which the draft Core Strategy below may be incorporated into the Draft Dublin City Development Plan is fully dependent on the analysis of factors such as land availability, population forecasts and enabling infrastructure.

The Core Strategy in the draft plan will be based upon the key principles of the NPF and the RSES and further expand upon the strategic development corridor approach of the MASP. The SPPRs of the Ministerial Guidelines will also be considered. The draft Core Strategy will apply both compact growth principles to the existing urban footprint of the City and a strategic transport corridor-based approach to growth that identifies new residential communities and mixed-use districts in areas based on their accessibility to public transport, development capacity, compact growth objectives, and the ability to deliver a reduced carbon footprint.

An examination of the capacity of existing zoned land will be carried out to determine the potential housing yield. Within the city, it is considered that all land will be considered Tier 1, i.e. land that is serviced. There will however, be a consideration of lands that may require significant infrastructural upgrades over the plan period in order to facilitate and/or expedite development.

Appendix B of the RSES, as guided by the National Planning Framework Implementation Roadmap 2018 envisages that Dublin City will have a population of between 638,500 (Low) and 655,000 (High) by 2031. For the high target, this is an increase of 5,980 persons a year over the plan period.

As noted above, DHLGH circulated the Housing Supply Target Methodology for Development Planning, December 2020, Projected Housing Demand by Local Authority Area 2020 – 2031 ESRI NPF Scenario Housing Supply Target. It contains housing supply targets for each individual local authority. For the city, it is estimated that the housing requirement over the plan period will be 4,861 units per annum.

It is considered appropriate that the draft plan cater for the NPF Implementation Road Map by bringing forward the population growth allocations and Section 28 ESRI housing supply targets.

It is intended that the Core Strategy and Settlement Strategy for the city will be framed; as in the current Plan, around three core principles:

- Identification of areas of regeneration within the built up areas of the city with significant ability to provide for growth in the short term (within Development Plan timeframe) and medium term (beyond 2028).
- Policies to support sustainable, appropriate infill on existing lands zoned for residential and mixed use purposes as such sites emerge.
- Support the provision of denser forms of development along key high capacity public transport corridors.

Dublin City Council stands apart from most other Planning Authorities due to the inherent urban character of its jurisdiction, its role as the capital city, and the significant scale of the complex challenges faced in bringing brownfield lands forward for development that dominate most of the lands identified in a Core Strategy. For these reasons, the timelines from identification and detailed planning of certain lands as regeneration sites to their role in delivering housing can often extend beyond 6 year horizons and for many larger sites; implementation can run over 2 to 3 plan periods.

In shaping the detail of the Core Strategy, the Council will look to put in place policies and objectives that ensure that the housing and employment growth required under the NPF and RSES can be delivered during the lifetime of the 2022 Plan and also lay down the building blocks for future delivery in subsequent plans. The preparation of the draft Core Strategy will be fully dependent on the analysis of factors such as land availability, population forecasts and enabling infrastructure.

Executive Summary of Issues Raised

Shaping the City

There was general consensus that the Development Plan should support compact growth by promoting more intensive forms of development. Submissions predominantly focused on increased height and density in appropriate locations as a way to achieve this, while some were opposed to greater height anywhere in the city. There was broad support for the application of height assessment and performance-criteria which were seen as means of ensuring quality design and placemaking, environmental protection and the delivery of a wider range of social benefits. Submissions also sought more proactive measures to make more efficient use of the city's building stock.

There was support for existing Strategic Development and Regeneration Areas (SDRAs) to be brought forward into the new plan, together with amendment to others and addition of new SDRAs particularly in relation to existing Z6 zoned industrial lands. A large number submissions were made on the Poolbeg West Strategic Development Zones (SDZ) with a key focus on the need for more affordable housing. A large number of submissions called for Local Area Plans for various named areas and more generally, a call that all urban villages should each have their own LAP and that old industrial lands that are re-zoned should be subject to Local Area Plans. A number of submissions also called for a Local Environment Improvement Plan (LEIP) or Village Improvement Plans with requests for specific planning frameworks for some areas.

A number of submissions called for the Regeneration of Z6 Lands and brownfield / other lands such as residential led regeneration of industrial lands and the re-zoning of some of the Z6 Employment lands to Z1 with some submissions citing social housing complexes in need of regeneration. A large number of submissions called for the regeneration, revival, rejuvenation and invigoration of inner city streets / quarters, including the north east inner city, citing the Moore Street Quarter in particular.

Submissions sought a renewed focus on urban living and that the liveability of the City should be an overarching theme of the plan. Submissions sought vibrant urban centres and also that the growth of the city is aligned with the '15 Minute City' concept whereby people's daily requirements can be reached within 15 minutes by foot, bike or public transport. The improvement of the public realm in the City Centre / urban villages is sought along with high quality urban design, placemaking and architecture.

Climate Action

There is broad support for the adoption of a range of actions to address the pressing issue of climate change. Submissions called for the implementation of the Dublin City Climate Action Plan, for the development of a more compact and sustainable city as well as for measures to reduce the energy use and carbon footprint of new and existing buildings. Submissions were largely in favour of measures to encourage the generation of renewable energy and there was considerable emphasis placed on 'greening' the city by planting more trees. There were also calls for a switch to more

sustainable modes of transport, for a more environmentally friendly approach to waste management and for adequate measures to be put in place to protect the city from flooding associated with climate change.

Quality Housing and Sustainable Neighbourhoods

Submissions called for the reinvigoration of the City Centre area by the increased residential use of the commercial core and the provision of sustainable housing through the promotion of residential use of older buildings, living over the shop and vacant buildings. There was some opposition to co-living, student accommodation, hotels and short term letting due to the transient nature of these accommodation typologies and their perceived over concentration and impact on existing city communities.

The requirements for sustainable city centre neighbourhoods were highlighted in many submissions including family sized apartments, recreational open spaces, direct access to public transport, high-quality mixed tenure housing, an emphasis on walking and cycling and local recycling facilities. The importance of childcare, play spaces, youth facilities, school provision and higher education for communities in Dublin is also emphasised. Many submissions highlighted that older people's needs should be met in the community with reference to housing, mobility, the public realm and the need to incorporate the Age Friendly Cities Approach.

Healthy place-making is emphasised in a large number of submissions including the continuing need to improve the health and well-being of the people of Dublin through the provision, maintenance and promotion of art, culture, sporting, play and recreation facilities at neighbourhood level. A large number of submissions called for affordable housing to be provided for all age groups and all income levels, with consideration given to apartment standards allowing for more affordable apartments, appropriate building heights and a specific zoning/land designation for affordable housing. Several submissions highlighted the problem of homelessness in the City and support for the Housing First approach. A large number of submissions called for the Council to build social, affordable and cost rental housing on public land and opposed the transfer of public land to developers.

The City Economy

Submissions noted the ongoing changes and challenges facing the city economy and stressed the need to support measures to ensure that the city remains an attractive place to live and do business for international business interests and for local people. There was support for measures to encourage the ongoing development of areas of existing economic activity such as the Docklands, but also for the regeneration and redevelopment of areas such as the north and south inner city in the face of new and significant economic challenges. Many submissions noted the role of a high quality public realm in stimulating economic activity while others emphasised the need to foster greater social inclusivity. Submissions also highlighted the important role played by specific sectors such as tourism, the night time economy, education and health, and there was also a recognition of the importance of Dublin Port to the city's economy.

The City Centre, Urban Villages and Retail

Submissions stated that the City Centre must build upon and consolidate the unique experiences that the City Centre offers to the visitor / the city's resident in a post Covid 19 context. Many noted that a mix of uses should be provided in the City Centre, including on the city's principal retail streets, in order to draw people into the city. Such uses could include residential uses and markets. This approach would need to be allied to an improved and expanded public realm. A number of submissions noted the '15 Minute City' concept / approach for the development of the City / Urban Villages whereby people's daily requirements can be reached within 15 minutes by foot, bike or public transport and that this should form part of the strategy for the growth of the city. Proactive policies are required to deal with the issue of vacancy in our urban centres and similarly with the development of a Night Time Economy. The need for parking for shoppers has been raised as has the issue of urban deliveries and kerbside loading. Greater flexibility in respect of outdoor advertising is sought.

Sustainable Movement and Transport

Many of the submissions received outlined support for the provision of high quality, fully connected pedestrian and cycling facilities to encourage more active mobility across the City. The increase in micro mobility and electric vehicles usage was recognised within the submissions as being a key contributor to providing more sustainable modes of transport within the City and various submissions outlined mechanisms in which their use and delivery could be supported within the Development Plan.

The importance of focusing development around transport infrastructure nodes and supporting the timely delivery of key infrastructure projects such as LUAS, Metrolink and Bus Connects was also noted in submissions. The reduction in the use of the private car within the city core to alleviate congestion as well as support for the concepts of the 15 Minute City and Low Traffic Neighbourhoods were also raised in submissions. Submissions identified a number of specific areas within the city where greater traffic management and enforcement matters could be implemented to alleviate local concerns raised.

The submissions overall highlighted the importance of progressing modal shift to sustainable transport modes in tandem with consolidating the city and improving accessibility to key destinations, as well as improving the attractiveness of the environment and public realm for walking and cycling.

Green Infrastructure, Open Space, Recreation and Natural Heritage

Many submissions highlighted the need to protect, promote and enhance the city's natural environment including local biodiversity areas and designated sites. Submissions sought that there be more greening of the city including more green spaces, parks, community gardens, native trees, planting and wildflowers. The delivery of a wide range of ecosystem services in our city through the delivery of green infrastructure was also supported. The development of more greenways, in particular, along the rivers and canals was sought as a means of sustainable and active travel and increased connectivity.

A number of submissions sought the provision of outdoor swimming facilities and water based activities including passive recreational facilities to be accommodated adjacent to the waterways. The need for more facilities and amenities in existing public spaces such as seating, toilets, tea rooms, drinking fountains and improved accessibility was detailed by many. Submissions also pointed to the need for more playing pitches and sports facilities to accommodate all ages and abilities. The importance of our citizens' health and wellbeing is raised with a focus on protecting and creating more green and blue spaces in the city to encourage healthy lifestyles.

Built Heritage and Archaeology

The submissions highlighted significant public and sectoral support for the protection and promotion of Dublin City's built heritage and archaeology. The majority of submissions regarding the Record of Protected Structures (RPS) requested specific additions to and deletions from the RPS. Architectural Conservation Areas (ACAs) feature widely throughout, with a consensus on the need to designate more ACA's.

There was a particular emphasis in many submissions on the need to encourage carefully considered adaptive re-use of historic structures across the City. Some concern was raised about the impact of taller buildings and high density developments on sensitive historic environments and buildings. A number of submissions highlighted the importance of protecting industrial heritage and 20th century architecture.

Many submissions emphasised the need to support historic markets in the City and requested policy for their protection. There was general support for the preservation and retention of historic elements of the public realm, the canals and their associated historic structures, as well as the unique character and heritage of maritime and coastal villages. Some submissions sought policy initiatives for the sensitive development of mews lanes. Overall, there was a focus on the social, economic and cultural regeneration of certain areas of the city, notably the Georgian core, Mountjoy Square, O'Connell Street and the Cathedral Quarter, along with requests for heritage-led plans for these areas.

There was significant support for enhancing the protection of archaeological sites, the promotion and protection of the City Walls and for incorporating archaeological finds and features within new developments so that the historic development of the city can be exhibited within these buildings.

Culture

Submissions focussed on a few key areas. One of these was the need to support and protect the night time economy and balance it with residential impacts, including the need to protect existing venues as well as the need for new spaces within the city to allow for music, dance, cinema and other popular evening cultural experiences. Also sought was expansion of opening hours of museums and other cultural offers into the evening to make them more accessible and to encourage more people into the City. Support was expressed for the development of cultural quarters, particularly the Parnell Square quarter (expanded to include Moore St., O'Connell St.) with suggestions for new spaces for other cultural forms such as an

Opera House, Gallery of Photography and Music Hub. Other quarters suggested were for D8, and Temple Bar as well as ones for Irish Language and Ireland's increased cultural diversity.

A strong theme was the need for affordable space for artists across the city, and also for affordable housing to support the sector in the face of increased rents and other challenges. A number of submissions discussed the importance of local community arts spaces, with a range of urban villages named as needing investment. There was strong support for expanded library facilities and other community uses to create viable hubs within the community.

The need for affordable and accessible music spaces for rehearsal and performance was raised and it was suggested that these should be integrated with other cultural investments such as arts hubs. The need for new City Centre space that could provide a space for young people to develop their musical interest was highlighted. The role of art in public spaces was also raised, and suggestions made on consultation and installation of new works as part of regeneration plans. The importance of the public realm for cultural experience was highlighted, with the need for more "fit for purpose" and multi-use spaces for events as well as the potential to accommodate street art, circus and outdoor performances and exhibitions. Also raised was the need for a focus on inclusivity both in the running of events and the built environment of cultural spaces. The need to engage with minority groups, newer residents and the Travelling community was raised as well as the importance of accessibility of cultural spaces, by adaptation and making use of assistive technology and braille signage. The need to support cultural businesses, museums and institutions after Covid was raised by a number of submissions as well as the need to monitor cultural assets in the City.

Sustainable Environmental Infrastructure and Flood Risk

A significant number of submissions focussed on the issue of flooding and sought to better manage Dublin's vulnerability to flood risks arising from climate change by using more innovative, nature-based and community-focused solutions. The Office of Public Works requested that the Development Plan accord with the Section 28 Guidelines on Flood Risk and set out specific criteria for the Council to consider.

A number of the submissions made related to the theme of foul water/ wastewater and focused on infrastructural capacity issues and related environmental concerns, with many calling for the Council to work in partnership with strategic infrastructure providers such as Irish Water. The importance of supporting key water supply infrastructure projects to ensure public water safety, quality and resilience was also emphasised, with many submissions encouraging the Council to introduce new policy requirements to encourage greater water conservation.

The themes of water quality, appropriate watercourse and surface-water management were addressed in many submissions which advocated for the greater use of nature-based approaches. There was also a new focus on the importance of appropriately protecting and managing the city's coastline.

Waste and litter management emerged as significant themes and there were calls for more sustainable and localised waste management infrastructure in line with the principles of the 15-minute city. Submissions made in respect of renewable/ alternative energy generation focused on the emergence of new technologies and infrastructures designed to provide more secure/ low carbon forms of energy, such as district heating systems supplied by waste energy. A smaller number of submissions were also made in respect to air/ noise pollution, street lighting, utilities, digital connectivity and land contamination. These focused on a range of issues including the need for evidence-based pollution management, noise management solutions, environmentally efficient and ecologically sensitive public lighting and support for the modernisation/ decarbonisation of the city's telecommunications and utilities networks.

Other Issues

Under the *Development Management/Standards* sub-theme, the issues raised included the need for more flexible development standards, better soundproofing and a criteria based approach to height. Others sought sustainable mobility requests relating to cycle parking, bike storage, cycle spaces and car-parking standards to be reduced and electric charging in driveways. Concerns were raised regarding the proliferation of street furniture and clearer development management policies regarding the reuse of existing buildings.

Under the *Zoning* sub-theme there were suggestions to distinguish between different accommodation typologies including aparthotels, co-living and student accommodation, that the Z8 zoning category promote greater mixed use development particularly in the South Georgian Core and that the Z9 land use category be reviewed.

Other submissions sought sufficient zoned land to facilitate educational use and places of worship and consideration of Z6 zoned land for more appropriate higher density development and/or with an SDRA designation. Some submissions called for a zoning review to consider the development potential of publicly owned lands for greater densification.

Under the *Miscellaneous Category* there were a number of submissions on legislation provisions and guidelines including the implementation of Part V and the Vacant Site Levy together with impacts of Ministerial Guidelines and the Strategic Housing Development Process. A number of submissions on *Governance/Autonomy* included greater engagement and consistency between the Dublin local authorities, the need for Dublin City Council to retain control of development land for housing, call for new area committee led planning process and the need for a city mayor/night time mayor etc.

Issues raised with respect to *Engagement – Consultation and Communication* included the need for consultation with the Department of Education regarding school needs assessments, disabled person's organizations on matters such as universal design and accessibility, greater community engagement etc. With respect *Other Matters* - there were a significant volume of observations seeking more bins, public toilets, public seating, wheelchair friendly public facilities, public water

fountains, Dublin bikes scheme extension, etc. and more generalised comments about the procedure of making and implementing a Development Plan.

There were a number of submissions made on topics considered *Outside the Scope of the Development Plan* and these included issues relating to extant planning permission/development, enforcement, licencing and permits, funding, grants, tax incentives, rent relief, rates, service utilities, operational matters etc.

Part 2: Summary of Submissions by The Eastern Midlands Regional Assembly, The National Transport Authority and the Office of the Planning Regulator, and the Chief Executive's Opinion & Recommendations

The Eastern Midlands Regional Assembly

Submission No. S00108

Summary of Key Issues

The submission provides a general background on the purpose of the Regional Spatial and Economic Strategy, its legislative basis and the requirement for the forthcoming Dublin City Development Plan to be consistent with the objectives set out in both the RSES and the NPF to ensure a close alignment between local, regional and national policy. The submission highlights a number of key areas to which the Regional Assembly wish to draw attention to in the drafting of the Core Strategy of the City Development Plan.

Vision and Strategic outcomes

Notes that in determining the vision in the new plan, that the Council consider the Vision, Key Principles and Regional Strategic Outcomes of the RSES Chapter 2. It is further stated that the Regional Strategic Outcomes (RSO's) are aligned with the National Strategic Outcomes of the NPF and the ability to demonstrate delivery of these may potentially be linked to future funding sources.

Growth Strategy

The submission draws the attention of the Council to the Growth Enablers for the Eastern and Midland Region, along with Growth Enablers for Dublin City and Metropolitan Area and for the Dublin-Belfast Economic Corridor.

Sustainable Compact Growth

The submission outlines RPO 3.2 which requires local authorities in the Core Strategy to set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up areas of Dublin City. Reference is also made to the Guiding Principles for Infill and Brownfield Development and that RPO 3.3 determines that regeneration lands are identified in Core Strategies and that specific objectives are set out to develop these lands. It also notes that further guidance on the delivery and monitoring of compact growth will be addressed in the upcoming draft Ministerial Guidelines for Development Plans.

Settlement Strategy

The submission requests that the settlement strategy set out in the Draft Plan aligns with that in the RSES which has a focus on the consolidation of Dublin City and suburbs at the top tier of the Settlement Hierarchy. Reference is made to MASP and its vision and spatial framework for Dublin City and its suburbs to grow to a population of 1.4 million people. It notes that the Core Strategy of the upcoming CDP should have a focus on the delivery of identified Strategic Development Areas in the

MASP whilst retaining flexibility to provide for ongoing opportunities for increased densities, reduced vacancy and re-use of underutilised land.

National and Regional Population Targets

The submission states the publication by the Section 28 Guidelines on Housing Supply Target Methodology for Development Plans and accompanying ESRI Regional Demographics and Structural Housing Demand research, in addition to the transitional population projections methodology in the NPF Implementation Roadmap, will assist the Council in integrating the national and regional population projections into the Housing Strategy, informed by the Housing Need and Demand Assessment (HNDA) process, and assist in drafting the Core Strategy as part of the statutory Development Plan process.

Shaping the City

The Assembly welcomes the recognition given in the Issues Paper regarding the need for compact urban form. Reference is made to RPO's 5.4 and 5.5 which require local authorities to provide for higher residential densities and appropriate qualitative standards in line with relevant Ministerial Guidelines. It notes that Table 5.1 of the MASP identifies a number of Strategic Development Areas with the capacity to achieve higher densities.

Climate Action

It is recognised by the Assembly that the CDP will play a key role in the delivery of compact growth and sustainable development to reduce the Council's carbon footprint and address mitigation and adaptation requirements. Reference is made to a number of sections of the RSES that will help inform the future policy direction of the City Plan.

It notes that there is an opportunity in the plan for the further integration of policies to support modal shift as well as the promotion of energy efficient buildings, district heating, renewable energy etc. The attention of the Council is also drawn to the Climate Action and Low Carbon Development (Amendment) Bill. The new plan will be required to include measures to assess and monitor progress on carbon reduction targets in line with RPO 3.6 of the RSES.

Quality Housing and Sustainable Neighbourhoods

The submission details that the Guiding Principles for Healthy Placemaking set out in the RSES will assist the Council in planning for the provision of recreation and open space facilities etc. RPO's regarding planning for diverse needs as well as support for the Local Economic and Community Plans and the Local Community Development Committees are also referenced.

It is outlined that in preparing the Draft Plan, that the Council will be required to undertake an assessment of the availability and capacity of future residential and regeneration development lands within the City and to ensure a plan led approach in co-originating and developing strategic land banks to enable regeneration. It is

recommended that consideration is also given to the phasing and prioritisation of development lands and that all future land subject to zoning shall undergo an infrastructure and deliverability assessment.

It is recommended that the review of the plan be informed by an evidence based HNDA which will allow for detailed consideration of housing mix and the monitoring of housing supply in the preparation of a Housing Strategy and in the Core Strategy of the new plan. The Assembly draws the Council's attention to policies 9.3 of the RSES, including RPO 9.5, in that EMRA will support local authorities in preparing a HNDA and it is considered that a sub-regional HNDA is appropriate for the four Dublin Authorities. It is mentioned that the four Dublin Authorities should apply a consistent methodology to the preparation of the HNDA. It is noted that the Section 28 Guidelines on Housing Supply Target Methodology for Development Plans will support the preparation of a HNDA. It is also acknowledged that further DHLGH Guidelines on HNDA are currently being progressed.

The City Economy

The submission makes reference to Ch. 6 of the RSES which deals specifically with Economy and Enterprise and also to a number of RPO's including 6.3: Dublin Belfast Corridor, RPO 6.23: low carbon and circular economy and RPO's 6.15-6.18 and 6.8 regarding the role of natural and cultural assets in developing enhanced tourism and leisure experiences.

It is stated that the RSES also recognises the importance of skills and innovation (RPO's 6.25-6.27), research and technology (6.29) and co-working/digital hubs (RPO 6.31). Smart city initiatives are promoted under RPO 6.30.

The assembly advises that the identification of Strategic Employment Development Areas as part of the Development Plan process should be informed by an evidenced based assessment of the location, quantum, density and capacity of any future proposed employment zoned lands. Regard should also be had to the Guiding Principles for the Location of Strategic Employment and Investment Prioritisation as set out under the RSES and MASP as well as Table 5.2 of MASP which identifies locations for increased employment densities.

The City, Urban Villages and Retail

The submission notes the retail hierarchy for the region as presented in Table 6.1 of the RSES and that the future provision of significant retail development shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012. Regard should also be had to Section 8.3 – Integration of Transport and Landuse as well as RPO's pertinent to town centre renewal (RPO's 6.12-6.14).

The Assembly references recent research undertaken regarding which urban centres are most exposed to economic disruption caused by Covid 19. This research found that exposure is likely to be lower in urban areas that have a more diversified economic base, however, Dublin County had the highest number of commercial units in sectors which are most likely to be severely impacted.

It is noted that the plan will need to address both the short and anticipated long term impacts of a shift towards homeworking and potential decrease in tourism and commuting trips, as well as opportunities to facilitate co-working and remote working spaces and provide for a wider mix of daytime and nighttime uses in commercial centres. Enhanced accessibility and permeability in the public realm should also be supported.

Sustainable Movement and Transport

The Regional Assembly welcomes the Council's commitment to integrated transport and land use and to sustainable mobility. It notes that information set out in the Ch. 8 and Ch. 10 of the RSES will assist the Council in formulating policy to ensure the effective integration of transport planning with spatial planning policies.

The Assembly recognises that the sustainable growth of the City requires the provision of planned transport infrastructure, including those planned bus and rail projects set out in Table 8.2 and 8.3 of the RSES and section 5.6 of MASP, to support future development. It also notes that the RSES supports key targets set out in the Governments Smarter Travel Policy to achieve a reduction in car based commuting. It is recommended that there is early engagement with the transport agencies to ensure the integration of transport and land use in the forthcoming plan and to help achieve greater modal shift.

The Assembly notes the success of the accelerated measures implemented in response to the COVID 19 pandemic and supports the continued roll out of public realm and active travel interventions in line with the principles of universal design.

Green Infrastructure, Open Space, Recreation and Natural Heritage

The Assembly directs the Council towards a number of relevant sections of the RSES including the Guiding Principles for Green Infrastructure and Sustainable Urban Drainage and the Guiding Principles for Healthy Placemaking.

It is noted that there are significant opportunities to further develop a Strategic Greenway Network and that the design of greenways will need to be subject to careful routing and design to ensure the protection of environmentally sensitive sites. The development of improved visitor experiences, nature conservation and sustainable development activities within the Dublin Bay UNESCO Biosphere are also supported.

Reference is made to ongoing research being carried out to facilitate the integration of ecosystem services into policy and plan making which may help the green Infrastructure and Ecosystem Services Mapping in the City Plan.

Built Heritage and Archaeology

It is emphasised that good heritage management should be incorporated into spatial planning to promote the benefits of heritage led urban regeneration. Reference is made to RPO's 9.24 to 9.30 which may assist in the formulation of policy regarding the tourism and economic potential of our heritage assets.

Culture

It is noted that the review of the plan provides an opportunity to consider policies to support existing cultural spaces and provide for new opportunities to engage with culture. Section 9.7 of the RSES and RPO's 9.24-9.30 are particularly relevant in this regard.

Sustainable Environmental Infrastructure and Flood Risk

The Regional Assembly welcomes the Council's commitment to the provision of high quality infrastructure and utilities in a plan led manner to ensure that there is adequate capacity to support future development. It is recommended that there is early engagement with relevant agencies, including Irish Water, to ensure that water, air quality, noise and waste management accord with relevant EU and national legislation.

The submission draws the Council's attention to Sections 8.6 of the RSES which deals with communications and digital infrastructure (RPOs 8.25 and 8.26 refer) including support for the Smart Dublin Initiative (RPO 6.30) and to Section 10.3 which deals with future energy networks including the roll out of Smart Grids and Smart Cities and reinforcement of the Greater Dublin Area's transmission network (RPOs 10.19 to 10.24 refer) as part of Eirgrid's Development Strategy.

With regard to flood risk, it is recommended that the Council take into account the need to identify flood risks and ensure that resilience of critical infrastructure, as set out in RPO 7.43 of the RSES. The Planning Authority should also note the provisions of the National Mitigation Plan 2017 and the National Adaptation Framework 2018 in this regard. It is also stated that Local Authorities should take opportunities to enhance biodiversity and amenities where flood risk measures are planned and that riparian setbacks should be achieved where appropriate.

Chief Executive's Opinion

The contents of the submission from the Regional Assembly is noted and welcomed.

Vision and Strategic Outcomes

The Chief Executive acknowledges the requirements of Section 10(1)(A) and 10(2)(A) of the Planning and Development Act 2000 (as amended) in regard to the contents of the Core Strategy and the requirements for the Development Plan to be consistent with the NPF, RSES and the MASP.

The Chief Executive acknowledges the importance of both the NPF's National Strategic Outcomes (NSOs) and the RSES's Regional Strategic Outcomes. The vision for the next Dublin City Development Plan will take account of the Vision, Key Principles and RSOs of the RSES as set out in Chapter 2.

It is further acknowledged that both the NSO's and RSO's are broadly aligned with the United Nations Sustainable Development Goals the provisions of which will further inform the vision for the new plan in the areas of climate action and energy,

sustainable communities, economic development, education, health, equality, innovation and infrastructure and the overall creation of an inclusive, safe, resilient and sustainable City.

Growth Strategy and Sustainable Compact Growth

It is recognised that the provisions set out in section 3.2 of the RSES on Growth Enablers for the region and the contents of the MASP as set out in Chapter 5 and the Draft Plan will be informed by same. The requirements of RPO 3.2 and the principles of sustainable compact growth are also recognised. The framework for the Draft Core Strategy as set out in part 1 of this report demonstrates that the Draft Development Plan will be consistent with both National and Regional Policy in regard to the achievement of Compact Growth within the City.

In line with the provisions of RPO 3.3 and the requirements of section 10(2)(h) of the Planning and Development Act (as amended) the Draft Plan will include specific policies and implementation measures that will encourage infill / brownfield development in the city's designated Strategic Development Areas that are specific, targeted, and measurable.

Settlement Strategy

The Settlement Strategy of the Draft Plan will be prepared having due regard to the strategy and hierarchy set out in the RSES. The Draft Plan will include a Core Strategy Map, the contents of which will be guided by the statutory requirements of Section 10 (2) of the Planning and Development Act, 2000 (as amended).

The framework for the draft Core Strategy as set out in Part 1 of this report demonstrates that the Draft Development Plan will place a focus on the delivery of the identified Strategic Development Areas within the MASP while also providing for increased densities, reduced vacancy and the re-use of underutilised lands located within the Metropolitan Area.

As part of the plan review process, a Planning and Infrastructural Assessment (in line with the provisions of Appendix 3 of the NPF) will be carried out which will identify enabling infrastructural needs throughout the City to facilitate development.

National and Regional Population Targets

The provisions of the NPF and RSES with regard to population targets are acknowledged and will inform the Core Strategy. The publication of the recent Section 28 Planning Guidelines on Housing Supply Methodology for Development Plans which will assist in the preparation of the Housing Strategy and the Core Strategy is welcomed.

Shaping the City

The plan will include appropriate policies and objective to promote a compact urban form including higher densities and will identify appropriate locations including the Strategic Development Areas where such density can be optimised.

Climate Action

The area of Climate Action will form a key cross cutting theme throughout all sections of the Draft Plan and will be implemented having regard to the Climate Action Regional Strategic Outcomes 6-11 and the provisions of chapters 4, 7, 8 and 10 of the RSES.

Proactive policies will be included in the Draft Plan on key issues including modal shift, transition to electric and low emission vehicles and the promotion of energy efficient buildings, district heating and renewable energy.

With regard to the transition to a low carbon economy by 2050, the work currently being carried out by the Assembly is noted. The Council will endeavour to implement the provisions of any forthcoming guidance on the matter should it be feasible within the statutory timeframe associated with the making of the City Development Plan. Where feasible, measures to monitor progress on carbon reduction targets will be included.

Quality Housing and Sustainable Neighbourhoods

The NPF and RSES both promote healthy placemaking and support the objectives of public health policy. The plan will include a range of policies and guidance aimed at protecting the environment, open space provision and encouraging high quality design of both the built environment and public realm. The plan will include specific policies and objectives in relation to healthy placemaking.

The provisions of RPOs 9.1 and RPO 9.3 are noted and acknowledged. The need for responsive planning policy that is age and family friendly is recognised. The Draft Plan will include measures for the delivery of compact growth including a mix of housing types and tenures, new and enhanced public spaces, the protection of built and natural heritage alongside a connected sustainable transport network. The City Council will work proactively with the Land Development Agency where required.

With regard housing need, notwithstanding the absence of national guidance or toolkit at present, it is intended to carry out an evidenced based HNDA as part of the review process that will inform the Housing Strategy/Core Strategy and which will guide policies and objectives in the Draft Plan. It is intended that the HNDA will allow for consideration of housing mix in the forthcoming plan. All data set out in the Core Strategy will align with the NPF Roadmap population projections and the Housing Supply Target Guidelines.

The City Economy

The strategic role of Dublin City and the necessity to provide an appropriate planning policy framework to support and realise sustainable economic growth that ensures a good living standards for all is recognised.

The guiding principles set out for locating strategic employment, investment prioritisation in placemaking and the integration of land use and transport as set out in sections 6.3 and 8.3 of the RSES are acknowledged. The quantum/location and

types of employment to be located within the city will be in line with the RSES guiding principles and the provisions set out for the identified strategic employment corridors in the MASP.

The strategic importance of the Dublin Belfast corridor is also acknowledged and will be addressed in policy terms in the forthcoming plan. Appropriate policies will also be provided with regard to skills and innovation, research and technology, co-working/digital hubs and smart cities as required by the RSES. The issues of social inclusion and economic deprivation will also be addressed in the plan with policies to support the improvement of skills, to diversify local economies and promote SME's innovation and indigenous enterprise.

It should be further noted that the Council is committed to improving accessibility and inclusivity for all in society, regardless of age, means or abilities. The implementation of the Dublin City Local and Economic Community Plan will have a key role in driving Council activities and actions in this regard and will be fully supported by the City Development Plan.

The City, Urban Villages and Retail

The comment that EMRA will support the preparation of a new retail strategy for the region, to include an update of the retail hierarchy and retail floorspace requirements is welcomed. The Retail Strategy for the Greater Dublin Area 2008 – 2016 is out of date and no longer relevant to a sector that is undergoing such rapid change and challenges. The Retail Strategy set out in the Draft Plan will be informed by the Retail Planning Guidelines for Planning Authorities 2012 and the retail hierarchy will align with that set out in Table 6.1 of the RSES.

The Draft Plan will have full regard to section 8.3 of the RSES which sets out guiding principles for the location of trip intensive development such as large scale retailing. Full regard will also be had to RPO's 6.12-6.14 in terms of town centre renewal. Policies regarding co-working and the night time economy will also be considered as will further measures to improve accessibility and permeability in the public realm.

Sustainable Movement and Transport

The promotion of alternatives to the private car in accordance with section 10(2)(n) of the Act alongside the provisions of RPO's 8.1 and 8.4 of the RSES will form a key theme within the Transport Section of the Draft Dublin City Development Plan. The Council will work proactively with the NTA to identify infrastructural and other measures which will contribute towards a modal shift away from the private car. A key aspect of this work will be the development of modal shift targets over the short, medium, and longer term which will contribute towards the transition to a climate resilient low carbon city.

The Draft Plan will align with the Smarter Travel and Transport Strategy for the Greater Dublin Area 2016-2035. The Draft Plan will also align with Project Ireland 2040 and the RSES which emphasises the importance of public transport and healthy placemaking. The plan will also provide clear policy support for the provision of key planned transport infrastructure.

The comments of EMRA regarding the success of accelerated walking and cycling measures implemented under Covid are noted and such public realm and active travel interventions will be further explored and supported.

Green Infrastructure, Open Space, Recreation and Natural Heritage

The Assembly's reference to the Guiding Principles for Green Infrastructure and Sustainable Urban Drainage set out in Chapters 7 and 10 of the RSES are noted, and will be fully considered in the plan.

The plan will provide for policies and objectives regarding the development of greenways and sustainable development activities within the Dublin Bay UNESCO Biosphere.

Built Heritage and Archaeology

The current plan contains specific policies and objectives relating to the protection and conservation of our heritage assets. These policies will be reviewed and augmented as necessary in the forthcoming plan.

The tourism potential of such heritage will also be acknowledged key assets such our medieval and Viking heritage will be promoted as appropriate.

Culture

The City's wealth of cultural resources will be acknowledged, protected and enhanced through appropriate policy provisions in the forthcoming plan.

Sustainable Environmental Infrastructure and Flood Risk

The Council has actively engaged with the relevant infrastructural agencies through the early stages of the plan making process and will continue to do so through each of the plan making stages. Regard to Ch. 6 and 10 of the RSES will be had in the formulation of relevant policy provision.

The Draft Plan will be accompanied by a Strategic Flood Risk Assessment. RPO 7.43 specifically relates to the identification of critical infrastructure within the city and ensuring it is capable of withstanding, adapting and recovering from adverse events is paramount. Critical infrastructure includes transport Infrastructure, electricity and gas networks, flood risk management, and water services infrastructure. The City Council has a key role in the management of major emergencies within the city in line with the provisions of the Major Emergency Plan 2015 which includes risk assessments of the city area. It should be further noted that some critical infrastructure within the city is under the remit of other bodies such as Irish Water, Irish Rail, Bord Gais and the Electricity Supply Board (ESB) and Eirgrid.

Issues regarding the protection and enhancement of biodiversity, protection of environmentally sensitive sites, the creation of appropriate riparian corridors and enhancement of amenities will be considered where flood risk management measures are planned.

The provisions of the RSES relating to the delivery of communications and digital infrastructure, the development of future energy networks and reinforcement of the Greater Dublin Areas transmission network are noted. The Draft Plan will aim to facilitate the delivery of such measures through appropriate policy provision.

Detailed consideration will also be given to the matter of energy planning, the potential for district heating roll out as well as other matters including EV charging infrastructure and renewable energy.

Chief Executive's Recommendations on Policies and Objectives for Inclusion in the Draft Plan

- Prepare a strategic vision for the Draft Plan which aligns, as appropriate, with the objectives of the NPF, RSES and MASP.
- Prepare an evidence-based Core Strategy, Housing Strategy (including HNDA) and Settlement Strategy in line with the requirements of the Planning and Development Act 2000 (as amended) that is consistent with the objectives of the NPF, RSES and the MASP and relevant Section 28 guidelines.
- Ensure that the Draft Development Plan has regard to section 28 planning guidelines and is consistent with the relevant SPPR's and national and regional objectives.
- Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:
 - encourage infill / brownfield development,
 - focus growth on the city's designated strategic development areas identified in the Metropolitan Area Strategic Plan (MASP),
 - promote increased densities along public transport corridors.
- Support the preparation of Green Infrastructure Strategy for the city and support the development of interconnected ecological corridors in the city.
- Ensure the Draft Plan is informed by a broad planning and infrastructural assessment in line with the provisions of Appendix 3 of the NPF and promote the phasing of new development alongside the delivery of required infrastructure to create sustainable communities.
- Include climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, Dublin City's Climate Change Action Plan 2019-2024 and national legislation.
- Support compact growth as a means of delivering on climate action through efficient use of public transport, active travel and achieving greater energy efficiencies.

- Promote quality of life for all and the principle of healthy placemaking through the creation of healthy and attractive places to live, work, visit, invest and study in, as an overarching consideration in the preparation of the Draft Plan.
- Consider guiding principles for the identification of suitable locations for employment development; support economic growth within the city, having regard to the National Planning Framework and the Regional Spatial and Economic Strategy; and promote the development of key Strategic Employment Development Areas that align with MASP.
- Promote economic opportunities along the Dublin to Belfast corridor.
- Support and reinforce the retail hierarchy within the city having regard to the RSES, or any superseding regional retail strategy, and explore the opportunity to strengthen the retail function in the city and the key urban villages.
- Support SMARTER Travel and the NTA's Transport Strategy for the Greater Dublin Area 2016-2035.
- Promote sustainable settlement and transport strategies within the city and identify measures, including targets for modal shift, to reduce GHG emissions, a reduction in energy use and adaptation to climate change.
- Support an efficient and effective transport system, promoting modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance.
- Direct compact growth around existing and planned services ensuring that transport and land use are integrated to the greatest extent possible so that the demand for travel in general and for car-based travel is reduced.
- Work with TII and other national agencies, to protect and enhance the capacity of national routes, to minimise the impacts on the management of the broader network.
- Support the delivery and improvement of public transport infrastructure and services across the city including BusConnects, rail and LUAS in terms of connections, capacity, and efficiency of services in line with national and regional policy.
- Ensure that Sustainable Urban Drainage (SUDs) measures are incorporated into the Draft Plan to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions.
- Provide for the protection, preservation and promotion of the built heritage, including architectural heritage and archaeological heritage.
- Provide for the protection and enhancement of the city's cultural assets.

- Develop policies and objectives which support the delivery of the required infrastructure to promote and facilitate sustainable growth within the city.
- Ensure a sequential and precautionary approach to flood risk management in line with the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009).
- Support the development of innovative energy efficient technologies such as district-heating and combined heat and power.
- Promote and facilitate the use of renewable energy sources throughout the city including wind and solar energy and other technologies.
- Facilitate and promote the development of energy networks and ICT infrastructure where necessary to facilitate sustainable growth and economic development, subject to proper planning and sustainable development.

National Transport Authority

Submission No. S00683

Summary of Key Issues

Overview

The submission states that Development Plan will set out the manner in which the integration of land use and transport will continue and how a greater modal share towards walking, cycling and public transport can be promoted as a fully sustainable transport culture.

Primary Challenges

The submission identifies a number of primary challenges for the Development Plan. These include, climate change and the imperative to deliver a zero emissions transport network; the recovery from Covid 19 and the need to promote investment and diversity of uses in the City Centre where the potential for walking and cycling and public transport connectivity is the greatest. The submission states that the plan will need to promote policies that will enhance urban living and recommends that the plan sets out a pathway for regularising a number of the temporary Covid 19 mobility schemes so that they may be made a permanent feature.

Land Use and Transportation Integration in Forward Planning

The NTA promote the ongoing consolidation of development and note that they do not foresee any upper limit on development intensity in Dublin City Centre. Opportunities for brownfield and infill development at any location within Dublin City should be maximised and a spatial hierarchy of location types identified in accordance with their level of public transport accessibility and potential for walking and cycling.

It states that for potential emerging development areas such as the Naas Road, Dublin Industrial Estate and Jamestown, that the NTA will set out an approach to their servicing in the forthcoming Transport Strategy and will closely monitor transport requirements for these areas in co-operation with DCC.

The NTA also note however, that residential development sites which are critical to the achievement of long term sustainable growth based on high levels of accessibility, should be developed in a manner that demonstrates how the proposed development contributes to the establishment and long term maintenance of a viable, integrated and successful neighbourhood and community. A number of planning objectives that maximise residential amenity are set out.

The NTA note concern regarding development patterns in certain parts of the city with a large number of hotel and student accommodation developments permitted. It is recommended that the city pursue a range of lands uses in the City Centre and the urban villages.

The submission notes that there have been a number of large-scale developments in the city in recent years. It notes that in this context, the plan should include a specific objective that permission will only be granted for such developments where the Planning Authority are satisfied that the development is acceptable from a transport point of view; a full audit of walking and cycling facilities is undertaken; and that a programme for investment in any improvements is developed and agreed, including the levying of section 48 development contributions which would fund such infrastructure.

With regard to the private car, some concerns are raised in the submission regarding the radical rate of car parking reduction in some developments and is noted that reduced car parking standards may give rise to issues in less central areas. It is recommended that the plan identifies specific locations where car free residential developments or developments where a standard below 0.5 per dwelling unit may occur in principle.

In terms of commercial development, it is recommended that parking standards for non-residential developments in the current plan should be retained.

In terms of servicing, the NTA note that conflicts can arise and it is recommended that the plan states that applicants for development will be required to demonstrate how servicing of their development can be accommodated away from the public road, including the use of internal streets, courtyards or basements.

The need for improved pedestrian and cyclist permeability, including filtered permeability, is highlighted and it is recommended that the plan includes appropriate policies and objectives which provides for permeability for pedestrians and cyclists in new development; between new development and surrounding existing neighbourhoods; and for retrofitting permeability schemes into existing neighbourhoods in accordance with the NTA's Permeability: A Best Practice Guide.

Other recommendations of the submission include the need for policies to address vacancy in the city, and measures to promote the night time economy. With regard to the latter, the NTA state that they are committed to expanding public transport offer outside traditional schedules.

Transport Investment Priorities

The submission details that there are a number of significant public transport projects in the city underway and in the pipeline that will have transformative impacts. In this regard, it is recommended that policies and objectives that provide support for the implementation of DART+ programme, Metrolink and the Luas schemes to Finglas, Lucan and Poolbeg are included in the plan. It is also recommended that land use policies and objectives in the vicinity of proposed DART, Luas and Metro stations are reviewed in the context of enhanced accessibility and capacity which will arise as a result of the delivery of these schemes.

In terms of Bus Connects, the NTA recommend a suite of policies to be included in the Draft Plan including the mapping of the core bus corridor reservations; to provide for other works that will facilitate improvements to the bus service; and the

requirement for depots. It is also recommended that land use policy is reviewed at interchange points between BusConnects spine services and orbital services and between these services and existing and proposed rail.

The NTA also recommend proactive policies to support the delivery of high quality cycle schemes in the city. This would include policies regarding fully segregated cycle tracks, removal of on street car parking where required, further roll out of 30kph, upgrading of junctions for cycling etc.

The submission states that the plan should include sustainable transport indicators, including modal share.

It is also stated that the plan should provide policy support for the Safe to School Programme as well as measures to improve the walking and cycling environments at schools.

With regard to freight, deliveries and servicing, it is stated that the plan should state that where servicing is required on the public road, that it will be done in a manner that balances commercial requirements with the requirements of sustainable transport. It is also detailed that policies must be provided regarding sufficient space for taxi facilities in the city.

The NTA submission notes that the plan should include policies and objectives which facilitate a range of measures which would support cycling and other personal mobility modes including scooters, e-scooters and e-bikes.

The NTA recognise the strategic importance of the Eastern Bypass and the Southern Port Access Route and that the requirements as identified by TII for the delivery of these schemes should be reflected in the Development Plan. The protection of the carrying capacity of the national road network, including the M50 Dublin Tunnel should also be considered.

The submission concludes by noting that the NTA is currently reviewing the Transport Strategy for the Greater Dublin Area and that the NTA will continue to engage with the City Council to ensure that the strategy and City Plan are closely aligned.

Chief Executive's Opinion

Primary Challenges

The challenges identified by the NTA are recognised and will be proactively addressed in the Draft Plan. The NTA's support for the successful temporary Covid 19 mobility schemes in the city is welcomed. It is envisaged that future regularising of such schemes will most likely be achieved through the mechanism of Part 8 to ensure appropriate consultation with communities, businesses and other stakeholders. However, a policy to review the successful measures that have been put in place to date with a view to identifying which may be suitable for permanent retention will be included in the Draft Plan. Local interventions and those within urban villages would be more appropriately considered as part of area

wide/neighbourhood mobility plans, an approach which can be supported through policy in the Draft Plan. The Draft Plan will also include additional policies supporting active travel and collaborative engagement with communities and schools.

Land Use and Transportation Integration in Forward Planning

The Draft Plan will support the continued consolidation of the city in line with national and regional policy. The identification of a spatial hierarchy of development areas based on levels of accessibility will be considered in the Draft Plan. Input from and collaboration with the NTA will be sought in the development of such a spatial hierarchy to ensure alignment with the emerging NTA Strategy.

With regard to emerging development areas in the city, Dublin City Council engages closely with the NTA in the development of mobility strategies to serve large development sites as they come forward through the development management process. At present, the most efficient use of existing infrastructure is sought by ensuring good connectivity from these sites to existing infrastructure and ensuring that provision is made in layouts for proposed infrastructure such as Bus Connects. The Chief Executive welcomes forthcoming proposals and guidance for areas with large development potential and the Draft Plan will take cognisance of same.

It is acknowledged that residential sites must be developed in a manner that contributes to the establishment of viable, integrated and successful neighbourhoods and communities. A suite of measures will be set out in the Development Plan to promote high quality and sustainable development that aligns with the principles of the 15 minute city, healthy placemaking and that include high quality amenities and open spaces, adequate social and community infrastructure and that cater for a variety of people and households.

The concerns of the NTA regarding over concentration of certain development patterns in the city are noted. It is also acknowledged however, that hotel and student accommodation development in the city have played an important role in providing quality accommodation for the student and tourist sectors with positive impacts regarding the availability of housing stock in the private residential sector to meet housing demands. Such schemes have also in many instances had transformative regeneration benefits including employment benefits. The matter of overconcentration will be considered further in the Draft Development Plan and any policy provision underpinned by a robust evidenced based approach. The objective is to promote balanced, sustainable and mixed use development in the city.

The NTA's comments regarding large scale development in the city in recent years are noted. It is normal practice through the development management process to assess such proposed developments in the context of suitability based levels of accessibility. It is also normal practice to engage at early pre-planning stage with applicants to develop mobility strategies for sites which address internal layouts and infrastructure provision in parallel with wider improvements to the environment in the vicinity of the site. Such improvements often include widening of footpaths, provision of pedestrian crossings, upgrade to signalised junctions and public realm schemes. Where affected by infrastructure proposals e.g. for bus or cycle schemes, the sites make spatial provision for same through reservations. In practice, such

improvements are included with DCC consent within the 'red line' of the application and, therefore, form part of the permitted development. It is intended that the Draft Plan updates existing processes/practices through the inclusion of guidance on the preparation of mobility strategies for development sites.

Section 48 of the Planning and Development Act 2000 as amended, enables a planning authority, when granting a planning permission under Section 34 of the Act, to include conditions requiring the payment of a contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority. The City Council's Section 48 Development Contribution Scheme sets out the basis for determining the contribution to be paid in respect of public infrastructure and facilities and the different classes of public infrastructure and facilities which are to be provided. The income generated from the Council's Section 48 Scheme is an essential source of funding used to part fund the citywide capital works programme.

The NTAs concerns regarding the radical rate of car parking reduction in some developments is acknowledged. There has been considerable pressure in recent years, and in particular since the introduction of the Design Standards for New Apartments - Guidelines for Planning Authorities Apartment in 2018, to permit residential schemes with minimal or no car parking and reduce costs associated with basements. Dublin City Council's approach to residential car parking in the current and previous development plans has recognised the need for some car storage within developments and the risk of overspill parking where such storage is not provided within the curtilage of development sites.

It is recognised that a level of car parking is required to enable people of all ages and abilities to live in the city. In practice, a case by case approach is taken to development sites with bespoke mobility strategies developed with applicants that are informed by the location of the site, accessibility to public transport, the range of facilities and amenities within easy walking and cycling distance and census and other data regarding travel patterns and car ownership. Reduced parking levels are supplemented by the provision of shared car schemes to be in place upon occupation as well as high quality cycle parking provision. More explicit policies and spatial expression of appropriate levels of residential car parking will be included in the Draft Plan. The three parking zones will be reviewed.

Regarding parking standards for non-residential developments, the significant reduction in the maximum standard for employment (offices) in zone 1, City Centre, is being considered in favour of accessible and fleet/shared car scheme. This is to strengthen existing policies discouraging commuting by private car and to assist in achieving more ambitious targets for sustainable movement. All car parking standards will be reviewed in the forthcoming Draft Plan.

The servicing of development is a major consideration in the development management process. While current policy addresses this, it is intended to strengthen policies regarding servicing in the Draft Plan. However, it is acknowledged having regard to the constrained nature of infill sites, that internal servicing may not always be possible. In the City Centre and urban villages, on street servicing will continue to be a long term operational requirement.

The NTA's comments regarding the need for improved pedestrian and cyclist permeability are noted. Permeability and connectivity are important design considerations in new developments and are encouraged as normal practice through the development management process. Retrofitting permeability and filtered permeability should be considered as part of wider area or neighbourhood plans, an approach which can be supported through policies in the Draft Plan. Policies supporting NTA guidance documents will be included in the Draft Plan.

The importance of the night time economy is acknowledged and will be supported in the Draft Plan. Measures proposed by the NTA to expand the public transport offer outside of traditional schedules, with the potential result of spreading peak travel times, are welcomed.

The plan will address, in so far as is possible, the matter of active land management, including measures to reduce vacancy in the city.

Transport Investment Priorities

Dublin City Council is currently engaging with the NTA and other agencies regarding the proposed public transport infrastructure referred to in the submission, the future provision of which is welcomed. The Draft Plan will map this proposed infrastructure and, in this regard, the assistance of the NTA and other agencies is welcomed. The Draft Plan will include policies specific to the integration of land use with this new infrastructure e.g. transit oriented development, strategic mobility hubs and transport interchanges.

The NTA's offer of assistance in mapping the proposed Bus Connects routes and areas of interchange so that these can be included in the Draft Plan is welcomed. Policies to support Bus Connects in particular, and bus generally as a mode of transport with its associated infrastructural requirements, will continue to be included in the Draft Development Plan.

The Draft Plan will contain proactive policies regarding the delivery of high quality cycle infrastructure. It is not proposed to include 'blanket' policies with regard to the removal of on street car parking as this requires careful consideration on a case by case situation. The functions performed by on street car parking include meeting the needs of residents, visitors, businesses and accessibility requirements must be considered. Requirements for servicing and refuse collection must also be considered. The plan however, will acknowledge that the removal of on street parking is necessary and appropriate in some instances.

Dublin City Council will work closely with the NTA to identify appropriate targets for different transport modes for inclusion in the Draft Plan. It is envisaged that transport modelling being undertaken by the NTA will inform mode share targets for the city.

A policy to support the Safe to School Programme will be included in the Draft Plan. The draft plan will also contain policies supporting active travel in schools and the improvement of school gate environments.

With regard to freight, deliveries and servicing, service vehicles and taxis are generally reliant on kerbside space for which there is competition within the city, particularly in the City Centre. Where transport schemes are proposed, careful consideration must be given to the operational requirements of service vehicles and taxis. The NTA's recommendation that these requirements should be met in a manner that balances this need with that of sustainable movement are acknowledged and implemented where feasible.

Policies supporting micro-mobility and shared micro-mobility schemes will be included in the Draft Plan. Electric mobility, including the charging requirements for same will also be addressed in the Draft Plan.

Regard will be had to the outcome of the current study on the Southern Port Access Route and the Eastern By Pass in the Draft Plan. Policy will continue to support the carrying capacity of the national road network, including the M50 Dublin Tunnel.

Dublin City Council commits to continuing close collaboration with the NTA as both the Dublin City Development Plan 2022-2028 and the Transport Strategy for the Greater Dublin Area are developed.

Chief Executive's Recommendations on Policies and Objectives for Inclusion in the Draft Plan

- Support SMARTER Travel and the NTAS's Transport Strategy for the Greater Dublin Area 2016-2035.
- Review the successful Covid 19 mobility measures that have been put in place and identify which may be suitable for permanent retention.
- Support an efficient and effective transport system, promoting modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance.
- Support compact growth and identify a spatial hierarchy of development areas around existing and planned services ensuring that transport and land use are integrated to the greatest extent possible so that the demand for travel in general and for car-based travel is reduced.
- Include updated guidance on the preparation of mobility strategies for development sites and incorporate requirements for Active Travel Plans and Traffic Management Plans where appropriate through the Development Management process.
- Investigate measures which adequately meet the car parking requirements for residential and non-residential development in line with national planning and transport policy requirements.
- Strengthen policy provision regarding the servicing of development in the city.

- Support the delivery of a comprehensive network for safe cycling over the lifetime of the new plan including the delivery of new projects and the upgrade of the existing network and identify specific projects for delivery where possible.
- Include (and update existing) sustainable transport indicators, including targets for mode share, to monitor the policies and objectives of the Draft Plan over its lifetime.
- Support the delivery and improvement of public transport infrastructure and services across the City including BusConnects, rail and LUAS in terms of connections, capacity, and efficiency of services in line with national and regional policy.
- Work with TII and other national agencies, to protect and enhance the capacity of national routes including the M50 Dublin Tunnel, to minimise the impacts on the management of the broader network and to review the requirements of the Southern Port Access Route and the Eastern By Pass.
- Work with the NTA, Iarnrod Éireann and other operators, progressing a coordinated approach to the improvement of the rail network, integrated with other planned public transport modes to ensure maximum public benefit, and promoting sustainable transport options, and improved connectivity.
- Support the Safe to School Programme and include policies supporting active travel in schools and the improvement of school gate environments.
- Review Development Management policies in relation to the delivery of sustainable transport infrastructure in particular EV charging to support the use of cleaner fuel.
- Include policies to support micro-mobility and shared micro-mobility schemes.

Office of the Planning Regulator

Submission No. S00633

Chief Executive's Summary of Key Issues

Overall Approach to Issues Papers

The Office commends the Planning Authority for the comprehensive Issues Paper prepared and for preparing a summary approved by the National Adult Literacy Agency (NALA). They also welcome the use of digital engagement, dedicated website, use of local and national media to promote the plan and proactive use of social media. The primary school poster competition is considered a very positive initiative. The office also commends the Planning Authority for its use of public information webinars but we suggests that the webinars should have been held both during and outside office hours as this would have potentially captured a wider cohort of participation.

Core Strategy, Settlement Hierarchy and Implementation

Core Strategy

The submission refers to the provisions of the NPF, RSES, MASP and the Section 28 Housing Supply Target Methodology for Development – Planning Guidelines for Planning Authorities (DHLGH, 2020). It notes that the baseline information on population trends, housing delivery and dependency rates for the city as set out in the Issues Paper will form a solid base upon which the core strategy can be developed.

Settlement Strategy

The Office notes that the indicative approach to the core strategy set out in the Issues Paper aligns with MASP and that it will be essential that the core strategy aligns with the strategic development areas and corridors set out under Table 5.1 of MASP. The stated objectives of consolidation of the city and to exploit opportunities presented by investment in public transport are welcomed.

Implementation

The Office states that the delivery of enabling infrastructure and key future growth enablers (identified in NPF, RSES and MASP) are crucial. The resolving of capacity constraints including water supply, wastewater infrastructure as well as the delivery of transport investment priorities will be critical to facilitate growth.

The need for a tiered approach to zoning in accordance with the objectives of the NPF is highlighted. It notes that the scope of any infrastructural assessment study will need to take account of the full range of enabling infrastructures referred to in the RSES. It states that this information will enable the prioritisation of relevant land banks in the near, medium and longer term in order to achieve the growth objectives

for the city over the plan period. It is highlighted that there will be a need for consultation and collaboration with neighbouring authorities and infrastructural providers on the implementation of certain strategic development areas including North Fringe and Naas Road.

The Office advises that realistic account be taken of the level of certainty that the required infrastructure and facilitating works will be completed in time to facilitate the development of strategic areas to accommodate housing supply. It is suggested that it may be appropriate for the plan to identify a sequence of development opportunities.

It is noted that having regard to significant capacity issues relating to water infrastructure for the city, that there is continued engagement between the Council and Irish Water. Capacity constraints should also be mitigated through measures such as Sustainable Urban Drainage Systems. It is stated that the plan should set out what infrastructure and key enablers will be put in place to facilitate development consistent with the RSES and MASP.

Regeneration and Compact Growth

The Office welcomes the recognition of the role that urban regeneration and compact growth will play in the future development of the city and also notes that there are opportunities to revitalise urban villages and city neighbourhoods.

The strategic review undertaken by the Council of low intensity industrial areas in the city is commended and it is recommended that a similar approach to other underutilised lands in the city is undertaken. It is advocated that the plan should also set out measures to reduce vacancy and the underuse of existing building stock, as well as initiatives to promote the reuse, refurbishment and retrofitting of existing buildings.

With regard to building height, the office acknowledges the importance of implementing the Specific Planning Policy Requirements (SPPRs) set out in the relevant Section 28 guidelines including Urban Development and Building Heights (2018) in achieving compact growth.

It is also noted that the recognition in the Issues Paper of the need to promote healthy placemaking is consistent with MASP.

Economic Development and Employment

The Office states that the inclusion of objectives, policies and mechanisms to secure the development of Strategic Employment Development Areas will form a key element of the plan.

The Office notes that the city has made much progress in supporting the role of Dublin as the leading national economic driver of the State. The challenges and uncertainties facing the city stemming from Covid 19 and Brexit are acknowledged. It is stated that the Development Plan must consider how the City can contribute to the development of the Dublin-Belfast corridor.

The submission acknowledges the absence of an up to date joint regional strategy with the other Dublin Authorities and notes that the retail hierarchy set out in the RSES will apply.

Transport and Accessibility

The Office states that the Transport Strategy of the RSES, MASP and the Transport Strategy for the GDA will form the basis of the settlement and transport strategies in the Draft Plan. Appropriate provision must be made in the Draft Plan to support the delivery and integration of key transport enablers to accommodate city growth over the plan period, including BusConnects, DART/Luas expansion and Metro Link.

The continued shift towards active and sustainable modes is promoted and it is detailed that the further integration of spatial and transport planning and compact growth will be critical to achieving this change as well as other measures including the promotion of active transport modes, appropriate car parking standards and locating trip intensive development in areas served by high capacity public transport.

It is stated that the Planning Authority should in consultation with the NTA and TII identify any development areas within the city that will require a Local Transport Plan. The office also encourages the Council to include broad modal shift targets to be achieved over the plan period, aligned to relevant implementation measures in order to achieve meaningful improvements in GHG emissions and energy use.

The office recommends that the plan commits to the proactive implementation of the Design Manual for Urban Roads and Streets (2019) which will assist in promoting sustainable and active transport modes, in addition to the improvement of the street environment and overall quality of life of urban areas.

The OPR notes that the Draft Plan must also ensure that there are appropriate policies to protect the carrying capacity, operational efficiency and safety of national roads and the light rail network in particular, the M50 and Dublin Port Tunnel as well as routes for future projects including the Dublin Eastern Bypass Corridor and the M50 South Port Access.

Climate Action and Renewable Energy

The submission notes that the Issues Paper clearly sets out the policy context governing climate action and includes clear definitions of climate mitigation and adaptation. It advises that similar definitions are included in the plan and consistency taken how they are applied across the plan. The Office advises that the reduction of carbon emissions and energy use will be cross cutting planning policy issues to be addressed in the plan and that climate adaptation and mitigation measures should be mainstreamed into the plan.

With regard to flood risk, the Office advises that the Council should consult with the Office of Public Works to ensure that the Strategic Flood Risk Assessment is consistent with the approach required under The Planning System and Flood Risk Management Guidelines for Planning Authorities and Circular PL2/2014 and that due account is taken of the potential impact of climate change on flooding.

The Office reiterates the importance of active and sustainable transport and the integration of land use and transport in addressing climate change.

The Office also advises that all land use zoning objectives should be included in the Development Plan rather than in local area plans. It also details that the forthcoming update of the Development Plan Guidelines will provide enhanced guidance for the preparation of development plans.

With regard to renewable energy, the OPR note the role of renewable energy in achieving a net zero carbon economy and that the plan should consider the interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update Review (July 2017). The plan should also clarify how it will ensure infrastructure such as district heating using waste heat will be implemented.

Culture and Heritage

The OPR notes the Council's strong record in the area of built heritage protection. It is noted that the plan will need to strike a balance between conservation and development and that this will be a challenge to address in the plan.

Chief Executive's Opinion

Overall Approach to Issues Papers

The comments made by the OPR on the Issues Paper and public consultation strategy implemented are acknowledged and welcomed. With regard the public webinars, 5 sessions were held on a range of topics, 2 of which were held at lunch time to facilitate those working. There was extensive advertising of the webinars prior to their broadcast. All of the webinars were professionally produced, recorded and subtitled. They were subsequently available to view on You Tube. There was a clear link to the webinar recordings on both the public consultation portal and the dedicated development plan web site. Subsequent to the event, these recorded sessions received over 1,978 views on You Tube.

Over 752 submissions were received from the public during the pre-draft public consultation stage. This is a 150% increase in the number of submissions compared to the same stage of the plan making process during the preparation of the current 2016 plan. In this regard, the Chief Executive is satisfied that a comprehensive and engaging public consultation exercise was implemented notwithstanding the level 5 restrictions.

Core Strategy, Settlement Hierarchy and Implementation

The Chief Executive acknowledges the requirements of the Planning Act 2000 (as amended) with regard to the Core Strategy and that the development plan must be consistent with the provisions of the NPF, RSES and the MASP. The plan will include specific policies and implementation measures to encourage consolidation and infill development in the city's designated strategic development areas as well as along key strategic public transport corridors.

With regard to the NPF approach to tiered zoning, the Chief Executive is of the view that all land within the city's administrative area constitutes Tier 1 land i.e. land that is zoned that is serviced. It is acknowledged however, that there are potential strategic development areas that will require significant infrastructural upgrades as well as public transport infrastructure to ensure their sustainable development over the plan period and beyond. A broad infrastructural study to be undertaken to support the plan will consider such issues and inform the appropriate sequential development and prioritisation of strategic brownfield sites in the city.

It is acknowledged that significant capacity issues exist for water infrastructure in the city and the Council will continue to actively engage and liaise with Irish Water to ensure that the plan includes appropriate interim measures to mitigate such capacity constraints. The plan will include a comprehensive suite of measure to promote the implementation of Sustainable Urban Drainage Systems. The plan will also identify what key infrastructure will be put in place over the plan period to facilitate development over the medium and longer term.

With regard to strategic development corridors traversing the city, the City Council is actively engaged with South Dublin County Council regarding the Naas Road area. It is intended to continue this engagement and to coordinate the vision and objectives regarding the future growth of this key strategic area with South Dublin County Council.

Similarly, with regard to lands in Belmayne-Clongriffin, the Council will actively liaise with Fingal County Council on issues of mutual interest to ensure the co-ordinated build out of this development area.

Regeneration and Compact Growth

The important role of urban villages, their potential to act as focal points for existing and new communities and that there is further scope to regenerate and revitalise such centres is acknowledged. The plan will identify key urban villages with the city and set out proactive policies and measures to ensure the future development, enhancement and consolidation of these areas in line with the principles of the 15 minute city.

With regard to underutilised sites in the city, it is envisaged that the plan will maintain the approach adopted under the current development plan and identify key strategic development and regeneration areas in the city that are appropriate for intensive residential and mixed use development. The plan will set out appropriate guiding principles for the future development and enhancement of such areas in accordance with the principles of compact growth and will also identify key opportunity sites for development within such areas. Proactive active land measures will also be set out to seek to reduce vacancy and underuse of existing building stock as well as support for the refurbishment and retrofitting of existing buildings.

As part of the review process of the plan, it is intended to prepare a Building Height Strategy which will have regard to relevant Section 28 Guidelines including the Urban Development and Building Height Guidelines (2018), the Sustainable Urban Housing: Design Standards for new Apartments (2018) and the Sustainable

Residential Development in Urban Areas (Cities, Towns and Villages) to inform policy provision and performance based criteria to guide and assess future development.

The importance of Healthy Placemaking will be a cross cutting theme in the forthcoming plan with the inclusion of appropriate policies and objectives.

Economic Development and Employment

The city is facing unprecedented challenges arising out of the Covid 19 coupled with uncertainties regarding Brexit. A core objective of the Draft Plan will be to promote economic resilience and to continue to promote the city as a major economic driver for the state.

The principles for locating strategic employment, investment prioritisation in placemaking and the integration of land use and transportation as set in the RSES are acknowledged. The economic strategy in the Draft Plan will be informed by these principles and align with the Strategic Employment Development Areas detailed under MASP.

The strategic importance of the Dublin Belfast corridor is acknowledged and the plan will provide for proactive policies to support further economic opportunities.

The Draft Plan will align with the RSES retail hierarchy and set out appropriate policies to facilitate and guide the future growth of retail in the city. The Draft Plan will continue to support the vitality and viability of the City Centre and the main district centres in the city in order to ensure a competitive and healthy environment for the retail sector whilst reinforcing sustainable development.

Transport and Accessibility

The promotion of sustainable transport modes will be a key policy approach in the Draft Development Plan. The Draft Plan will align with Smarter Travel and the Transport Strategy for the Greater Dublin Area 2016-2023 and will be informed by the guiding principles for the integration of land use and transport set out in the RSES.

The Council continue to work proactively with the NTA to identify further measures which will contribute to a modal shift away from the private car. Modal shift targets will be identified which will contribute towards the transition to a climate resilient low carbon city. The Council will also work with the NTA to identify any future development areas that would benefit from a Local Transport Plan.

Objectives aimed at protecting the strategic function of the national road network, existing infrastructure and routes for future projects will be included in the Plan. Furthermore, the Plan will promote existing and planned public transport investment and the alignment of future growth and development along key public transport routes. The Draft Plan will also include clear policies regarding the implementation of DMURS.

Climate Action and Renewable Energy

The Council are committed towards the delivery of a low carbon climate resilient City in line with the provisions of section 10(2) (n) of the Act. Climate Action will form a key cross cutting theme throughout the different chapters of the Draft Plan.

The Draft Plan will be accompanied by a Strategic Flood Risk Assessment and will liaise with the OPW to ensure that the SFRA aligns with the guidance set out under the Planning System and Flood Risk Management Guidelines for Planning Authorities and Circular PL2/2014. Appropriate measures to support renewable energy and sustainable energy will also be set out in the plan including guidance on the implementation of district heating systems in the city.

Land use zoning objectives in the city area will continue to be included as part of the Development Plan, as had been standard practice by Dublin City Council. A full review will take place of the zoning maps as part of this review to ensure zonings are relevant and appropriate.

The forthcoming update of the Section 29 Development Plan Guidelines are welcomed. The Council will endeavour to implement the provisions of such guidance should it be feasible to incorporate same in accordance with the statutory timeframe associated with the making of the City Development Plan.

Culture and Heritage

The challenges of achieving a balance between compact growth, densification and conservation are acknowledged and proactive policies and objectives will be included in the plan to ensure the ongoing protection of both our built heritage and the sustainable development of our city.

Chief Executive's Recommendations on Policies and Objectives for Inclusion in the Draft Plan

- Prepare a strategic vision for the Draft Plan which aligns, as appropriate, with the objectives of the NPF, RSES and MASP.
- Ensure that Section 28 planning guidelines and associated Special Planning Policy recommendations inform the policies and objectives of the Draft Plan.
- Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:
 - encourage infill / brownfield development,
 - focus growth on the city's designated strategic development areas identified in the Metropolitan Area Strategic Plan (MASP),
 - promote increased densities along public transport corridors.

- Prepare an evidence-based Core Strategy, Housing Strategy (including HNDA) and Settlement Strategy in line with the requirements of the Planning and Development Act 2000 (as amended) that is consistent with the objectives of the NPF, RSES and the MASP and relevant Section 28 guidelines.
- Ensure the Draft Plan is informed by a broad planning and infrastructural assessment in line with the provisions of Appendix 3 of the NPF and promote the phasing of new development alongside the delivery of required infrastructure to create sustainable communities.
- Facilitate a co-ordinated approach to the future development of the Naas Road area and the Belmayne-Clongriffin area with South Dublin Co. Co., Fingal Co. Co. respectively and relevant stakeholders.
- Ensure that Sustainable Urban Drainage (SUDs) measures are incorporated into the Draft Plan to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions.
- Explore opportunities to enhance and develop key urban centres as focal points to the communities that they serve in line with the principle of the 15 minute city.
- Identify key strategic development and regeneration areas in the city, including key opportunity sites that are appropriate for intensive residential and mixed use development in accordance with the principles of compact growth.
- 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.
- Promote measures to reduce vacancy and underuse of existing building stock as well as support for the refurbishment and retrofitting of existing buildings.
- Promote appropriate and sustainable building height in the City to accord with the Urban Development and Building Height Guidelines and other relevant Section 28 guidelines and consider appropriate assessment criteria to evaluate proposals for increased height.
- Promote quality of life for all and the principle of healthy placemaking through the creation of healthy and attractive places to live, work, visit, invest and study in, as an overarching consideration in the preparation of the Draft Plan.
- Consider the guiding principles for the identification of suitable locations for employment development; support economic growth within the City, having regard to the National Planning Framework and the Regional Spatial and Economic Strategy; and promote the development of key Strategic Employment Development Areas that align with MASP.

- Support and reinforce the retail hierarchy within the city having regard to the RSES, or any superseding regional retail strategy, and explore the opportunity to strengthen the retail function in the City and the key urban villages.
- Promote economic opportunities along the Dublin to Belfast corridor.
- Support SMARTER Travel and the NTAS's Transport Strategy for the Greater Dublin Area 2016-2035.
- Promote sustainable settlement and transport strategies within the city and identify measures, including targets for modal shift, to reduce GHG emissions, a reduction in energy use and adaptation to climate change.
- Support an efficient and effective transport system, promoting modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance.
- Concentrate compact growth around existing and planned services ensuring that transport and land use are integrated to the greatest extent possible so that the demand for travel in general and for car-based travel is reduced.
- Work with TII and other national agencies, to protect and enhance the capacity of national routes and the Port Tunnel, to minimise the impacts on the management of the broader network.
- Support the delivery and improvement of public transport infrastructure and services across the city including BusConnects, rail and LUAS in terms of connections, capacity, and efficiency of services in line with national and regional policy.
- Seek to implement the provision of the Design Manual for Urban Roads and Streets (as updated) in relation to the delivery of safe streets and overall best practice design.
- Include climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, Dublin City's Climate Change Action Plan 2019-2024 and national legislation.
- Support compact growth as a means of delivering on climate action through efficient use of public transport, active travel and achieving greater energy efficiencies.
- To promote and facilitate the use of renewable energy sources throughout the city including wind and solar energy and other technologies.
- Ensure a sequential and precautionary approach to flood risk management in line with the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009).

- Support the development of innovative energy efficient technologies such as district-heating and combined heat and power.
- Provide for the protection, preservation and promotion of the built heritage, including architectural heritage and archaeological heritage.

Part 3: Summary of Submissions & the Executive's Opinion & Recommendations

Theme 1: Shaping the City

Submission Number(s):

S-00331, S-00108, S-00075, S-00084, S-00090, S-00091, S-00100, S-00116,
S-00414, S-00424, S-00524, S-00029, S-00486, S-00106, S-00696, S-00699,
S-00701, S-00702, S-00703, S-00706, S-00709, S-00713, S-00717, S-00720,
S-00722, S-00724, S-00726, S-00238, S-00257, S-00117, S-00132, S-00142,
S-00316, S-00730, S-00731, S-00732, S-00734, S-00745, S-00274, S-00256,
S-00198, S-00010, S-00697, S-00698, S-00700, S-00704, S-00705, S-00707,
S-00708, S-00710, S-00711, S-00712, S-00714, S-00715, S-00716, S-00718,
S-00719, S-00721, S-00723, S-00725, S-00727, S-00087, S-00728, S-00729,
S-00733, S-00735, S-00736, S-00740, S-00063, S-00069, S-00080, S-00001,
S-00002, S-00066, S-00093, S-00102, S-00114, S-00009, S-00013, S-00033,
S-00034, S-00041, S-00056, S-00060, S-00065, S-00079, S-00082, S-00101,
S-00104, S-00107, S-00111, S-00130, S-00139, S-00131, S-00135, S-00141,
S-00152, S-00161, S-00164, S-00178, S-00192, S-00193, S-00194, S-00195,
S-00202, S-00203, S-00213, S-00218, S-00233, S-00242, S-00244, S-00245,
S-00250, S-00261, S-00264, S-00268, S-00279, S-00290, S-00301, S-00329,
S-00332, S-00341, S-00344, S-00346, S-00350, S-00351, S-00354, S-00359,
S-00361, S-00369, S-00398, S-00399, S-00404, S-00406, S-00407, S-00408,
S-00410, S-00412, S-00426, S-00427, S-00447, S-00453, S-00455, S-00456,
S-00462, S-00490, S-00514, S-00515, S-00516, S-00519, S-00522, S-00529,
S-00542, S-00543, S-00552, S-00559, S-00560, S-00563, S-00566, S-00582,
S-00610, S-00615, S-00618, S-00620, S-00629, S-00633, S-00637, S-00638,
S-00641, S-00642, S-00646, S-00647, S-00648, S-00649, S-00651, S-00652,
S-00654, S-00655, S-00656, S-00660, S-00661, S-00662, S-00663, S-00664,
S-00668, S-00669, S-00671, S-00672, S-00680, S-00682, S-00684, S-00688,
S-00689, S-00690, S-00147, S-00150, S-00157, S-00160, S-00163, S-00168,
S-00169, S-00174, S-00176, S-00179, S-00196, S-00199, S-00205, S-00211,
S-00214, S-00226, S-00243, S-00246, S-00254, S-00255, S-00273, S-00280,
S-00293, S-00294, S-00299, S-00303, S-00304, S-00319, S-00326, S-00335,
S-00336, S-00339, S-00357, S-00358, S-00368, S-00380, S-00382, S-00393,
S-00395, S-00403, S-00409, S-00413, S-00416, S-00417, S-00443, S-00444,
S-00452, S-00454, S-00461, S-00469, S-00470, S-00472, S-00476, S-00478,
S-00482, S-00489, S-00491, S-00494, S-00507, S-00508, S-00551, S-00553,
S-00557, S-00562, S-00567, S-00572, S-00574, S-00578, S-00580, S-00586,
S-00595, S-00597, S-00603, S-00605, S-00606, S-00608, S-00613, S-00619,
S-00622, S-00643, S-00644, S-00645, S-00650, S-00653, S-00657, S-00658,
S-00659, S-00665, S-00666, S-00667, S-00670, S-00673, S-00674, S-00676,
S-00677, S-00678, S-00679, S-00681, S-00683, S-00686, S-00687, S-00691,
S-00692, S-00693, S-00694, S-00695, S-00747, S-00748, S-00170, S-00449,
S-00460, S-00040, S-00626, S-00086, S-00057, S-00337, S-00343, S-00356,
S-00364, S-00425, S-00467, S-00549, S-00389, S-00411, S-00137, S-00146,
S-00183, S-00272, S-00216, S-00277, S-00352, S-00388, S-00428, S-00165,
S-00517, S-00206, S-00741, S-00284, S-00523, S-00220, S-00260, S-00271,
S-00627, S-00327, S-00568, S-00136, S-00746, S-00749, S-00750, S-00751,
S-00601, S-00377, S-00387, S-00437, S-00441, S-00442, S-00616, S-00589,
S-00500, S-00564, S-00592, S-00599, S-00640, S-00479, S-00229, S-00558,
S-00300, S-00433, S-00445, S-00538, S-00584, S-00162, S-00281, S-00282,

S-00283, S-00308, S-00302, S-00270, S-00384, S-00167, S-00391, S-00503, S-00464, S-00742, S-00737, S-00512, S-00607, S-00485, S-00743, S-00153, S-00675, S-00547, S-00617, S-00588, S-00466, S-00397, S-00483, S-00473, S-00598, S-00007, S-00752

Summary of Issues

Overarching / Strategic Approaches

Many of the submissions encouraged plan-led compact growth, urban regeneration, brownfield development, higher density and greater building height through appropriate development management and active land management. There was general consensus that the Development Plan should promote more intensive forms of development and identify appropriate locations for increased building height and density guided by appropriate performance assessment criteria.

Compact Growth and Densification

Compact growth including brownfield development and densification was generally supported as a way to end urban sprawl and create a 15-minute city. Higher density was also seen as a means to maximise / alleviate pressure on transport infrastructure and deliver more high-quality housing. The majority of submissions noted that density does not automatically equate to height, and requested that varying options for delivering density are explored. Allowing for appropriate height in designated areas was acknowledged as a means of achieving compact growth in keeping with the character of the city.

Submissions put forward varying opinions for densification, with increased density supported in the City Centre, the Docklands, on brownfield/ infill/ strategic regeneration sites, in urban/ suburban villages, in low-rise suburban areas within the M50, and along key public transport corridors/ hubs in order to create critical mass. Areas seen as unsuitable for further densification included the Liberties, Rathmines, Coolock and Meakstown, with submissions expressing general concerns over increased building densities.

Where increases in density are proposed, submissions generally sought the delivery of mixed/ full lifecycle housing; a high standard of building design and built environment; consideration of sustainable energy, environmental and heritage sensitivity; is supported by proportionate investment in social infrastructure/ public facilities; and, provides for reasonable access to green space and public transport infrastructure. A small number of individual submissions also raised more specific issues in respect to densification. These included concerns over its viability in the context of the Covid-19 pandemic; prescriptive development standards acting as a barrier to densification; the need to balance densification plans with the operation of established intensive industrial/ other uses and sensitive habitats; the requirement to review plot ratio and site coverage standards; and, density boundaries related to KDCs (Key District Centres) as an implementation issue.

Urban Design and Placemaking

A number of submissions outlined that new development needs to engage creatively with the City – its distinct character, historic fabric and unique mix in order to make it an attractive place / to protect its character / historic fabric. Some submissions

considered the City's character is in danger of being eroded by development. Many submissions acknowledged the need for intensification / increased building height /densities in the City but sought the application of high standards of urban design and placemaking so that new development is integrated sensitively into the City's urban structure, thereby, protecting its character.

The components of high quality urban design and placemaking identified in submissions for new development / the existing environment, include: the provision of permeable development / centres to facilitate access / movement; designing safe and healthy streets /spaces which prioritise the pedestrian and provides opportunities for physical activity; the provision of a mix of uses; the provision of a variety of building typology and building heights to create places with a distinct sense of place; high quality architectural design, and, urban greening. A submission references the need for new development to comply with the relevant Ministerial Planning Guidelines in this regard.

Submissions stated that the plan should seek high standards of architectural design for new buildings especially high buildings and that the plan should only permit exemplary housing design. Submissions emphasised the need for standards for sustainable / flexible building designs for climate change resilience purposes and to meet people's lifetime changing needs.

One submission stated that the views of children should be sought in planning / urban design matters. Another submission stated that the plan should encourage / acknowledge the role of architects as central to infrastructural / placemaking projects and that it should support excellence in knowledge in performance and delivery of the built environment. It was also stated that there is a need for the creation of an independent design review panel for all development proposals.

Submissions identified opportunities for placemaking at the following locations – around the canals, Broadstone, around the City's laneways and one submission identified the need to build / create a sense of place around the city's Victorian townships.

Height Strategy and Guidance

The large number of the submissions received in respect to height were generally supportive, but differ significantly in their views on the city's height strategy and guidance. The potential of greater building heights to deliver affordable/ good quality housing, public amenities and communal public green spaces in the city was welcomed by many. It was considered by some that the Development Plan should continue to define what is meant by 'low rise', 'mid-rise' and 'tall' buildings and should identify appropriate locations for height/ increased height/ high rise buildings based on performance criteria and supported by amenities, services and infrastructure. A few submissions called for the introduction of minimum height requirements and for greater restrictions to be placed on the delivery of low rise development, whilst others recommended that minimum and maximum height guidance is provided for different city locations relative to accessibility by sustainable transport modes.

Several submissions were in favour of the removal of blanket height restrictions in areas of the city capable of accommodating taller buildings – with differing views on which areas could accommodate such height and what that height should be. The submissions generally supported additional height in the City Centre, Docklands and IFSC, at Heuston and on urban brownfield sites of scale, with specific submissions seeking additional height at locations such as Georges Quay, the Naas Road and the South West inner city. There was a lack of consensus on the nature of this height, with some advocating for mid-rise development of 5-6 storeys in line with the city’s existing built character or capping at 6 storeys, while others favoured a high-rise approach and called for a default minimum height of 6+ storeys. A number of submissions focussed specifically on appropriate heights for suburban areas and generally supported mid-rise buildings in these locations.

Several submissions were unsupportive of height/ the removal of height limits and raised many concerns in respect to high rise buildings, with many noting that the 2018 Building Height Guidelines have negatively impacted on the physical character of the city. Some considered that removing height restrictions will give rise to uncoordinated and unsympathetic development, and provided examples of perceived unsympathetic/ excessive height in the city. Concerns were raised in respect to the impact of additional incremental height increases on residential amenity and their potential to inflate housing and land costs. It was noted that there is already adequate provision for tall buildings within the city’s SDZs / planning schemes and it was suggested in some submissions that building heights should be restricted to 4 storeys in most neighbourhoods. Some submissions specifically sought the protection of the following areas from height increases: maritime and coastal villages such as Ringsend and Sandymount; the South Quays; the city’s commercial core; the Liberties; Rathmines; and Rathgar, and called for Dublin’s low rise built heritage and character to be maintained.

Height Assessment / Performance Criteria

A number of submissions requested that the Development Plan’s current height policy and guidance be retained and existing building heights respected, while others sought the removal of prescriptive height caps across the city (which were considered to stifle innovative design solutions), or the application of various maximum and minimum buildings heights. A number of submissions highlighted the importance of following the Building Height Guidelines and other national/ regional planning and development policy, whilst a small proportion called for this guidance to be disregarded.

A significant number of submissions focussed on the requirement for height assessment and performance criteria. DCC’s background paper published as part of the pre-draft consultation process was generally welcomed with some submissions requesting that the proposed performance criteria for assessing proposals for enhanced density/ scale and landmark tall buildings set out in the pre-draft consultation paper be adopted as part of the Development Plan. Concerns were raised in some submissions regarding the placing of size threshold limits on sites that would be considered capable of accommodating tall buildings and that such prescriptive size thresholds could undermine core strategy brownfield regeneration targets and lead to material contravention issues. The requirement to produce a Masterplan to provide for coherent development was raised as another issue that

could stop or delay sites coming forward, with a small number of submissions indicating that its implementation would be unfeasible due to land assembly issues caused by multiple ownerships. New York's Transferable Development Rights system – which provides for a transparent negotiation framework/ ability to purchase development rights from nearby buildings - was put forward as a potential solution to this issue.

A qualitative, site-specific case-by-case approach to assessing the suitability of any particular location in the city for increased building height was generally supported. A number of submissions requested that areas targeted for new tall buildings/ high-rise clusters be clearly identified in the Development Plan and their implementation at local level supported by Local Area Plans or Urban Design Frameworks. It was proposed that these documents would also set out robust design-led criteria for the evaluation of proposals that seek to exceed the predominant heights of any locality.

Submissions made a number of recommendations on how proposals for tall/ landmark buildings should be assessed and a wide variety of suggestions were made on the nature of performance criteria that should be applied. It was felt that tall buildings should be designed for flexibility/ maximum use/ mixed use and should be assessed as to their ability to deliver affordability, increased housing supply, reasonable building construction and running costs, and social gain in the form of new community facilities (as needed). Other recommended considerations were heritage impact, placemaking contribution, sustainable energy, climatic/ quality of life impacts and ensuring urban blocks provide for a mix of height. One submission sought specific design guidance for set-back storeys and the permitting of set-backs of exemplary design character.

The need to protect visual amenity emerged as a priority in many submissions, with some focusing on the preservation of important views in/ out of the city, while others sought to prevent visual clutter or cumulative negative disruption of the visual character/ low rise skyline along the River Liffey, the city quays and historic areas between the canals. Specific issues were also raised in respect to the need for an evidence-based approach to the location of tall buildings, to height boundaries as they relate to KDCs and the need to review plot ratio and site coverage standards.

Tall Landmark Buildings

A number of submissions related to the topic of tall landmark buildings and many acknowledged the role that height clusters and landmark buildings could play in the future development of the city. Submissions differed on their definition of the term 'tall' with some proposing that 5-8 storeys could be classed as a tall building while another felt that tall buildings would be up to 30 storeys. Tall buildings of varying height were supported in select locations such as the City Centre, Docklands, Heuston, George's Quay and within the canals, and where they adjoined public transport corridors/ hubs and public open spaces. The historic city core, sensitive districts with heritage constraints, village/ neighbourhood centres and regeneration areas such as the North East Inner City, Liberties and Phibsborough, were all seen as locations unsuitable for tall buildings.

Submissions supportive of height and landmark buildings called for them to be subject to rigorous assessment with suggested performance criteria including the delivery of high quality design and residential accommodation, assessment of height/massing and shading, respect for local character, accessibility to transport infrastructure, environmental sensitivity, contribution to placemaking and delivery of public amenities. Specific recommendations were also made in respect to the tools that should be used to assess tall buildings with proposals ranging from 3D visualisation to a holistic performance based assessment matrix.

Efficient Use of Building Stock/Land

A number of submissions requested that efficient use be made of the city's vacant / derelict building stock through refurbishment / reuse / retrofitting and repurposing and called for unused, underutilised or derelict office/ commercial properties to be redeveloped for residential and community uses. The Living Over the Shop initiative was referenced as a way to facilitate this objective, in addition to the roll out of incentive measures such as tax breaks, tax free allowances, reduced Section 48 levies and supports for the upgrade/ adaption of existing buildings. The submissions highlighted the promotion of upper floor uses through the Living City Initiative as another way to address vacancy and underutilised building stock with one individual suggesting that targets should be set to meet a percentage of the city's housing demand from refurbishment of existing buildings. The implementation of legislation pertaining to vacant site and derelict sites was also called for to ensure that residential and regeneration sites are re-developed urgently. The need to leverage the potential of URDF and other such funding was also noted. Some submissions also called for more effective use of state/semi state lands for development including bus depots, army barracks etc.

Strategic Development and Regeneration Areas (SDRAs)

A number of submissions called for existing City Centre SDRAs to be carried forward into the new plan and that such areas should be the focus of higher density development to maximise the use of public transport infrastructure. There were specific requests to amend the guiding principles applicable to some of these areas, particularly in relation to SDRA 18 National Concert Hall Quarter – to modify the extent and location of commercial and residential areas; SDRA 7 Heuston - seeking reference to 'cone of vision' be removed; and SDRA 15 St. James Hospital Campus and Environs - to have regard to new Children's Hospital and relocation of Coombe maternity hospital on site. There were also requests for new SDRA's including the Gullistan waste management centre; the former Church of Ireland College of Education lands on Rathmines Road Upper; Jamestown Business Centre and Malahide Road Industrial Estate.

A number of submissions sought a new SDRA in the vicinity of the existing SDRA for the Naas Road lands specifically around the Kylemore area (east of the Kylemore Way/Road and Jamestown Road near Inchicore village) identifying that such lands would benefit from regeneration/residential uses as provided for under a Z14 zoning generally associated with an SDRA designation. One submission however, sought recognition of established industrial uses on Z6 zoned lands and noted concerns regarding SDRA designation/rezoning in proximity to such established industrial uses and Seveso sites. One submission highlighted the need for public engagement in the planning process in respect of the City Centre SDRA's.

Strategic Development Zones (SDZ)

A small number of submissions called for minimum heights to be introduced in the city's Docklands in order to maximise the efficiency of its land use. Some of these submissions called for a range of suitably dense mid-rise and high-rise residential accommodation whilst others sought the revocation of the North Lotts and Grand Canal Dock SDZ Planning Scheme in order to provide for greater height and density than what is currently permitted in the Scheme.

A large number submissions were made on the Poolbeg West SDZ with a particular focus on the need for more affordable housing on these lands. Other matters raised included the need for greater linkages with the port area and for employment opportunities to be exploited as well as road, access and traffic issues.

One submission called for the designation of additional SDZs to facilitate the redevelopment and rezoning of industrial estates whilst another cited both docklands and Adamstown (SDCC) as good examples of how to plan and implement Community Based Sustainable Development. There was also a submission that sought the Dorset Street area to be designated a Strategic Development Zone designation due to its location between Grangegorman and the new cultural quarter at Parnell Square.

Local Area Plans (LAP)

A large number of submissions called for LAP's for various named areas including Crumlin, Dolphins Barn, Donnybrook, Harold's Cross, Inchicore-Kilmainham, Meakstown – Hamptonwood, Ranelagh, Rathmines, Ringsend – Irishtown, Sandymount and Santry/Whitehall. More generally, there was a call that all urban villages should each have their own LAP and that old industrial lands that are re-zoned should be subject to LAPs.

Local Environment Improvement Plans (LEIP)/other Planning Frameworks

A number of submissions called for a Local Environment Improvement (LEIP) or Village Improvement Plans with public realm improvements requested for a number of areas of the city including Rathmines, Ranelagh, Donnybrook and Dunville Ave.

There were also a number of areas of the city where there were specific requests for specific planning frameworks including an action plan for Griffith Avenue, a strategic masterplan for Cathal Brugha Barracks as well as plans to facilitate physical and social regeneration including often with a cross sectoral approach, for Rialto, Drimnagh, Broadstone, D1, 2 and 8 and the Pembroke District.

Regeneration of Z6 Lands and Brownfield / Other Lands

A large number of submissions called for the general consideration of residential led regeneration of industrial lands and the re-zoning of some of the Z6 Employment lands to Z1 Residential as a means to promote compact growth and the delivery of housing and related services within the existing built-up areas of Dublin City in close proximity to high frequency public transport. This included Z6 Lands at Jamestown Road, Finglas and smaller Z6 lands. It was noted by some, that with the expansion

of the Docklands, and emerging locations such as Heuston, Smithfield and Grangegorman, that the smaller Z6 and Z7 land banks dispersed throughout the City Centre are no longer appropriately zoned, have been vacant/underdeveloped for many years and would be more suitably zoned for residential development. These smaller sites have the potential to come forward for redevelopment in the shorter term.

Submissions indicated that social housing complexes in the City require regeneration and that the redevelopment potential of institutional lands should be explored.

A large number of submissions called for the regeneration, revival, rejuvenation and invigoration of inner city streets / quarters, including the North East inner city citing the Moore Street Quarter in particular.

Liveable City

A number of submissions highlighted that the city needs a renewed focus on urban living and that the liveability of the city should be an overarching theme of the plan along with others such as sustainability and resilience. It is stated that the Covid 19 crisis has exposed the challenge relating to the liveability of the City.

Submissions stated that a dense vibrant city for residents needs to be created. In this regard, more families / people need to be attracted to living in the city and areas such as the Georgian Core. Submissions called for family friendly and liveable housing with gardens and amenities to attract families to live in the City Centre and the wider city more generally.

Submissions pointed out that urban liveability includes access to transport / sustainable travel modes, access to a diverse range of services / facilities / cultural attractions etc., secure neighbourhoods, vibrant public realm / urban spaces and access to housing.

Submissions highlighted that there is a danger in favouring growth over remedying existing problems in the City and that 'bad' city life such as traffic and urban pollution, urban disadvantage, and issues of dereliction / vacancy in areas such as the City Centre and Urban Villages, needs to be ameliorated.

One submission references the 'doughnut economic model' of planning for sustainable neighbourhoods such as practiced in Amsterdam

Role of Centres / 15 Minute City

Submissions universally acknowledged the role of the City Centre as the principle urban centre in the City / state. Many submissions supported its future development and regeneration by calling for a strong dynamic City Centre core surrounded and supported by a necklace of well serviced, integrated and connected urban villages.

Outside the City Centre, a number of submissions called for future development to be focused in the city's Urban Villages / those centres that have an appropriate level of services and facilities. A number of submissions sought proportionate investment / planning in the City's Urban Villages to accommodate future growth / urban regeneration.

Submissions requested that the next Development Plan actively promotes the '15 Minute City' concept / approach for the development of the City Centre/ Urban Villages whereby people's daily requirements can be reached within 15 minutes by foot, bike or public transport. One submission stated that this approach should be used to guide the shape and structure of the City but that clear guidance / a strategy is required on this. Another submission stated that this approach is potentially flawed and it would have to be subject to an economic analysis / study.

A number of submissions supported / see future growth focused (though not necessarily exclusively) on the City's brownfield lands, including existing industrial estates, where these lands have access to good quality public transport, and along public transport corridors.

A number of submissions are concerned that ongoing building on the city edge has led to a hollowing out of the City Centre / impacted upon the development of Urban Villages.

Public Realm

Many submissions sought the creation of quality civic / public environments in the City Centre and Urban Villages with more space for pedestrian and cyclist movement allowing for improved access to facilities / amenities.

To achieve this, submissions sought a range of approaches, including: increased pedestrianisation / widened footpaths, pedestrian prioritisation / healthy street approach as part of street design, restrictions on cars, improved civic amenities including seating, the regeneration and provision of new urban spaces, opportunities for active and passive recreation / enjoyment in the public realm, increased permeability of existing / new urban environments, greening of the public realm, the decluttering of streets and the rationalisation / reduction of street furniture / signage, opportunities for street art / display art and increased permeability and passive surveillance.

Submissions also sought that all public spaces should be designed in accordance with universal design and be age / gender /child friendly. One submission commended some of the public realm works carried out to date by the City Council but highlighted that there is more to do. Submissions also called for the expansion of the City Centre Public Realm Strategy to the Urban Villages to facilitate the '15 Minute City' approach.

Submissions also sought a street manager for landmark streets; public realm improvements on Dame Street / O'Connell Street Bridge; the delivery of the proposed plaza at College Green; the pedestrianisation of the City Centre / the Grafton Street area, other City Streets and Rathmines.

Chief Executive's Opinion on Main Issues Raised in relation to Shaping the City

Overarching / Strategic Approaches / Compact Growth and Densification

The importance of planning for compact growth and densification in order to make more efficient use of urban land/ infrastructure and deliver sustainable communities and high quality neighbourhoods is recognised. It is proposed to continue to facilitate these objectives through the council's development management and active land management practices, and other core strategy measures designed to meet compact urban development targets.

It is acknowledged that the relationship between density and height is a critical factor in densifying the city and it is intended that the plan will strive to appropriately manage the future densification of the city by ensuring that quality development takes place in tandem with necessary social and physical infrastructure and delivers wider social, economic and environmental benefits.

The various options for densifying the city, including different building typologies and suitable locations for greater building height/ density, such as in SDRAs will be considered.

Urban Design and Placemaking

The Chief Executive recognises that well considered urban design, architecture and placemaking can make a positive contribution to the city's urban environment and can improve the environmental performance competitiveness and attractiveness of the city as a place to live and work. High quality urban design that provides spaces for recreation and social interaction and which supports active lifestyles through good quality pedestrian and cycle links, particularly to places of work, education and recreation make the city a healthier more sustainable place to live. The next Development Plan must continue to promote development which incorporates exemplary standards of high quality sustainable and inclusive urban design, urban form, healthy placemaking and architecture befitting the city's environment and heritage through the development of design principles, policies and standards for urban design and architecture.

Height Strategy and Guidance

Appropriate and sustainable building height in the city in accordance with the Urban Development and Building Height Guidelines (2018) and other relevant planning policy will be promoted. It is proposed to prepare a Building Height Strategy which accords with on relevant Section 28 guidance to inform the policy and performance based criteria that will be used to guide/ assess future development proposals for increased height.

Height Assessment / Performance Criteria

Appropriate and sustainable building height in the city in accordance with the Building Height Guidelines will be included in the Draft Plan. These guidelines set out various development management criteria to be considered in the assessment of developments where increased height is proposed. These criteria will be built on, together with the potential criteria set out in the Council's Pre-Draft Plan Background Paper on Building Height and Density, in order to formulate a series of performance based criteria for assessing higher density proposals, including enhanced height. Further consideration will also be given to issues raised by the submissions in respect to the size threshold of sites capable of accommodating tall buildings, quantitative tools to manage overdevelopment and the requirement to produce a

masterplan in respect of significant schemes. Tools such as plot ratio and site coverage will also be used to ensure higher density schemes are appropriately developed to a high standard.

Tall Landmark Buildings

It is recognised that tall or landmark buildings have a specific role to play in the future legibility and built fabric of the compact city. In line with best practice, it is intended to provide specific guidance on their constitution, location, design and performance criteria as part of the Draft Plan.

Efficient Use of Building Stock

The socio-economic and environmental benefits of making the most efficient use of the city's existing building stock in line with brownfield regeneration, compact growth and climate action targets is recognised. There will be continued support for active property management through the Living City Initiative and Living Over the Shop Scheme as means to address challenges such as vacant and underutilised building stock in the city, and appropriate policies will be set out in this regard in the Draft Plan. Incentive measures (such as new legislation and tax breaks) to encourage the upgrading/ adaptive reuse of existing buildings are matters outside the scope of the Development Plan.

The introduction of the Vacant Site Levy legislation together with the existing Derelict Sites legislation has seen much vacant land activated during the course of the development plan. These enacted active land management measures are considered an essential tool to monitor the activity on lands deemed vacant under the Act and will be given appropriate policy support in the plan.

Strategic Development and Regeneration Areas (SDRAs)

The call to maintain many of the existing SDRAs is noted and it is acknowledged such designations are a useful planning tool to bring forward regeneration across the city. All existing SDRAs will be reviewed as part of the development plan process and new areas identified as appropriate as a means to provide coherent, plan led regeneration.

Strategic Development Zones (SDZ)

The designation of areas as an SDZ is a function of the Government. They are normally applied to locations where there is capacity and a need for large scale strategic development of national importance to take place.

The large volume of submissions on the Poolbeg West SDZ requesting greater volumes of affordable housing is noted. The government designated Strategic Development Zone (SDZ) Poolbeg West Planning Scheme was approved by An Bord Pleanála April 2019. Under the scheme there are approximately 3,500 residential units with 25% earmarked for social housing and affordable to be delivered in the area.

The existing Planning Scheme for the North Lotts and Grand Canal Dock Strategic Development Zone (SDZ), adopted in 2014, includes a detailed development framework regarding the scale, form and density of development in the area.

Allowable height and density in this location will remain as permitted under the SDZ Planning Scheme or any future amendments to the Scheme.

Local Area Plans (LAP)'S

Table F in Chapter 2 of the current plan contains a schedule of 7 Local Area Plans/statutory plans to deliver the core strategy. To date, 2 no. Local Area Plans have been approved (Ballymun and Parkwest/Cherryorchard) under the current development plan and 1 no. SDZ scheme (Poolbeg West). It must be borne in mind, that the preparation of LAP is extremely resource intensive for Dublin City Council and Communities. Such plans are intended to provide more detailed planning policies for areas that are expected to experience significant development and change. As such, careful consideration should be given to the selection of appropriate areas for LAPs and a priority list for the delivery of such plans. A potential alternative may be to update the Development Plan Strategic Development and Regeneration Area designation to provide more comprehensive information to guide development in each areas. Local Environmental Improvement Plans may also provide a suitable alternative for the delivery of amenity improvements in conjunction with local areas. It is recommend all of the above must be considered in the Draft Plan.

Local Environment Improvement Plans (LEIP)/other Planning Frameworks

A number of named areas are seeking either a LEIP or other framework to be included with the plan. A comprehensive list of potential LEIP's are detailed in the plan and will be reviewed in the Draft Plan.

Regeneration of Z6 Lands and brownfield / other lands

The issue of Z6 zoned lands, that are underperforming, and their potential for more appropriately zoned land uses is noted and will be considered as part of a comprehensive review of all zoned lands in the Draft Plan.

The regeneration of public housing complexes (and public lands e.g. Oscar Traynor Road) has been ongoing during the development plan and will continue into the Draft Development Plan. Many social housing complexes are designated as SDRAs and will be reviewed, assessed and evaluated in the Draft Plan.

Liveable City

A liveable City provides a good quality of life and supports the health and wellbeing of the people living and working in it. The Chief Executive agrees that in order maintain and grow the City as a vibrant and resilient place to live and work, it needs to offer a high quality built environment where there is easy accessibility to services / facilities, jobs and open spaces. The next Development Plan must plan for its physical growth and social, economic and environmental development.

Role of Centres / 15 Minute City

Dublin City Centre (the inner city) performs the function of a capital city core. There has been significant growth and investment in the Inner City in the last number of years including major development in the Docklands, Grangegorman and Dublin Port, the redevelopment of long vacant brownfield lands along the Luas lines and the development of infill brownfield sites in areas of the Inner City such as the Liberties. The ongoing need for urban regeneration for parts of the inner City,

and the challenges of vacancy and underutilised and vacant sites in the Inner City will be a focus of the next Development Plan.

Outside of the City Centre, the next Development Plan will identify a hierarchy of urban centres. District Centres (Key Urban Villages) will form the top tier of centre outside the City Centre and below this will be those urban villages which provide for the daily shopping needs and local services of a residential community. The next Development Plan must ensure the sustainable development and consolidation of these urban centres so that they can function as a focal point for their communities and promote further investment, regeneration and environmental improvement.

National and Regional planning policy identifies strategic development and employment areas for population and employment growth in Dublin City. These include lands at Naas Road, Parkwest – Cherry Orchard, Ballymun, Clongriffin / Belmayne, St James – Heuston Lands, the Docklands and Poolbeg, Diageo lands and Grangegorman campus. The challenge will be to deliver quality sustainable housing and employment neighbourhoods in these growth centres that are integrated into the urban structure of the City / wider metropolitan area.

The Chief Executive agrees that many of our urban areas fulfil or have the potential to fulfil the '15 Minute City' role. Those elements of the '15 Minute City' concept, such as compact development, mixed use development, increased urban densities, high quality urban environments, the provision of sustainable travel modes and high levels of access to quality public transport must be pursued through the next Development Plan.

Public Realm

The City Council, through its Public Realm Programme, continues to invest in new civic spaces and public realm improvements in the City Centre. This is as part of the ongoing creation of a highly attractive high quality, inclusive, street environment which is pedestrian friendly and easily navigable and which enhances people's experience of the urban environment. The Public Realm programme is aligned over three Development Plans to 2034.

The ongoing implementation of 'Your City - Your Space', Dublin City's Public Realm Strategy (2012) and public realm projects and plans such as the Heart of Dublin City Centre Public Realm Masterplan, 2016, will provide for increased spaces / plazas for pedestrians and improved links between the north and south retail cores as well as the strengthening of key pedestrian routes in areas of high footfall and the animation / greening of the public realm.

The next Development Plan will need to consider targeting Local Environment Improvement Plans / Town Centre Renewal Plans and Placemaking Strategies to those Urban Villages which are in need of revitalisation.

Chief Executive's Recommendations on Policies and Objectives for Inclusion in the Draft Development Plan in Relation to Shaping the City

Compact Growth, Building Height and Active Land Management

- Actively promote quality compact growth through development management and land management practices, and explore opportunities to densify the city that deliver wider benefits.
- Seek the development of sustainable communities in the areas identified under the Dublin Metropolitan Area Strategic Plan for housing and employment growth in the City and provide for their integration into the urban structure of the City / wider metropolitan area.
- Promote appropriate and sustainable building height in the city in accordance with the Urban Development and Building Height Guidelines and consider appropriate assessment criteria to evaluate proposals for increased height, to include locational and design guidance for tall/ landmark buildings.
- Review quantitative development management tools, such as plot ratio and site coverage, in line with the preparation of new Height Strategy and Guidance.
- Promote Active Land / Property Management including the Living City Initiative, Living Over the Shop Scheme and the vacant site levy as a means to encourage brownfield development and quality densification in the city.
- Promote measures to reduce vacancy and underuse of existing building stock as well as support for the refurbishment and retrofitting of existing buildings.

Liveability

- Ensure integration across housing, social, economic, cultural, environmental and transport policy / objectives in order to promote sustainable growth and liveability in the city.
- Continue to seek the consolidation and enhancement of the inner city and the protection and enhancement of its character. Promote its compact growth, identify areas for regeneration, and, maximise opportunities provided by public transport / improved linkages.

Urban Villages

- Seek the sustainable development and consolidation of the City's urban villages to enable them to provide economic and community support for the neighbourhoods they serve and promote and enhance the distinctive character and sense of place of these centres.

Urban Design and Public Realm

- Promote exemplary urban design and architectural principles in order to achieve a liveable, climate resilient, quality, compact, well-connected city and to ensure Dublin City is a healthy and attractive city to live, work, visit and study in.
- Promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability or disability.
- Planning policy should continue to promote the development of public realm / greening strategies for our urban centres and investment in the urban environment in order to achieve a network of active, attractive and safe streets and public spaces with a high quality public realm which allows ease of movement for the pedestrian, which are inviting and which include, as appropriate, seating.

Plans

- Review existing SDRA's and identify further areas that have the potential to perform as major regeneration and development areas in accordance with the RSES and NPF.
- Give further consideration to areas to be considered as appropriate for an LAP and/or LEIP.

Theme 2: Climate Action

Submission Number(s):

S-00108, S-00414, S-00727, S-00331, S-00231, S-00048, S-00107, S-00135, S-00211, S-00382, S-00417, S-00159, S-00172, S-00109, S-00115, S-00265, S-00328, S-00534, S-00539, S-00385, S-00728, S-00080, S-00688, S-00654, S-00050, S-00079, S-00101, S-00007, S-00009, S-00033, S-00056, S-00078, S-00126, S-00134, S-00130, S-00139, S-00141, S-00150, S-00154, S-00192, S-00194, S-00195, S-00196, S-00198, S-00199, S-00202, S-00206, S-00208, S-00218, S-00225, S-00226, S-00228, S-00233, S-00240, S-00242, S-00250, S-00254, S-00262, S-00285, S-00290, S-00302, S-00305, S-00313, S-00317, S-00346, S-00348, S-00366, S-00369, S-00405, S-00442, S-00452, S-00472, S-00491, S-00497, S-00507, S-00508, S-00553, S-00573, S-00577, S-00582, S-00595, S-00608, S-00147, S-00148, S-00153, S-00161, S-00169, S-00174, S-00178, S-00182, S-00186, S-00187, S-00203, S-00205, S-00243, S-00244, S-00252, S-00261, S-00264, S-00266, S-00268, S-00273, S-00304, S-00319, S-00332, S-00361, S-00383, S-00399, S-00408, S-00416, S-00426, S-00434, S-00439, S-00443, S-00462, S-00470, S-00478, S-00490, S-00492, S-00516, S-00520, S-00522, S-00542, S-00551, S-00574, S-00580, S-00586, S-00605, S-00606, S-00615, S-00619, S-00315, S-00625, S-00624, S-00666, S-00454, S-00664, S-00663, S-00651, S-00407, S-00152, S-00447, S-00731, S-00637, S-00719, S-00086, S-00693, S-00709, S-00726, S-00618, S-00620, S-00658, S-00213, S-00277, S-00694, S-00388, S-00428, S-00284, S-00523, S-00327, S-00568, S-00326, S-00344, S-00444, S-00136, S-00437, S-00529, S-00673, S-00669, S-00717, S-00308, S-00676, S-00692, S-00297, S-00167, S-00737, S-00743, S-00607, S-00617, S-00466, S-00746, S-00473, S-00633

Summary of Issues

Overarching / Strategic Approaches

Submissions raised the need to adopt an ambitious approach to reaching the international and national targets set out in documents such as the Paris Agreement and the government's National Climate Policy.

The need to implement the Dublin City Climate Change Action Plan was also highlighted as was the need to adopt more holistic approaches to climate action by moving towards Net Zero Carbon and Carbon Neutral approaches to urban development. In doing so, submissions were generally favourable to the densification of the city and compact growth. There was strong support for the 15 minute city approach.

Community Participation and Education

Submissions called for a greater emphasis on active public engagement and on local and community initiatives such as Sustainable Energy Communities and Low Emission Zones.

There were also calls to educate citizens on what actions they could take themselves to help combat climate change and to ensure that the needs of disadvantaged communities were taken into consideration.

Energy

The issue of sustainable energy use and generation was raised by numerous submissions. There was a particular emphasis on the importance of encouraging the use of renewable sources of energy such as solar PV and offshore wind energy as well as the need to develop the City's District Heating Networks for new and existing development.

Other submissions highlighted the current dependence on the use of gas for domestic heating and expressed opposition to the expansion of the gas network and, more generally, for a move away from the use of fossil fuels for energy generation and heating.

New and Existing Developments

A considerable number of submissions highlighted the importance of ensuring that both new and existing buildings respond to the challenges posed by climate change. Submissions noted that the existing building stock represented a significant source of embodied carbon and that the reuse of buildings was a more effective approach than building new ones.

With regard to existing buildings, submissions called for measures such as increased retrofitting; increased energy efficiency; 'greening' of roofs and walls; the installation for PV roofing and for restrictions on hard paving to alleviate surface water run-off. A number of submissions called for upgrades to be carried out on existing social housing stock owned by Dublin City Council but also to Council owned public buildings.

With regard to new development, submissions called for requirements for proposals to demonstrate and achieve carbon neutrality in their design, construction and operation over the course of their life-cycle. Some submissions called for these requirements to be included as part of the overall development management process, while other referenced existing examples such as the BREEAM and LEED certification, as well as London's Climate Emergency Design Guide.

The Public Realm and Open Spaces

Many submissions highlighted the need to protect existing trees and planted areas, to plant more trees and to make the city greener and more supportive of biodiversity. In this regard, submissions called for the planting of pocket parks, 'parklets', and micro-forests, for the greening of road medians and for the creation of pollinator-friendly wildflower meadows.

Sustainable Transport

Following on from the issue raised above in relation to the public realm and open spaces, many submissions called for measures to make the city's streets and neighbourhoods more hospitable and welcoming for pedestrians and cyclists in order to encourage more active forms of movement. There was a clear recognition of the need to move towards more sustainable transport modes in order to reduce adverse effects of pollution from emissions.

Submissions also called for a greater emphasis on more sustainable modes of transport including cycling and public transportation but also for measures to limit the use of private cars in the city.

Some submissions raised the potential of electric vehicles to reduce localised air emissions and called for the development of a more extensive network of on-street charging points, as well as for both the City Council and public transportation providers to switch to electric vehicles.

Coastal and Surface Water Flooding

The issue of flooding was raised in a number of submissions with calls for measures to ensure that existing and proposed transportation infrastructure and development areas were future-proofed against predicted sea-level increases. Submissions also drew attention to the problem of surface water run-off and flooding and called for replacement of hard surfaces with impermeable ones, for restrictions on the paving over of areas such as driveways and gardens and for the implementation of SUDS principles in all new developments.

Waste Management and the Circular Economy

A number of submissions emphasised the role of waste management in reducing the city's carbon footprint with calls for an increased focus on reuse and recycling and better waste segregation. There were also calls for a move towards a Circular Economy Approach and for measures to encourage the development of more local food production.

Chief Executive's Response in Relation to Climate Action

Overarching / Strategic Approaches

The pressing need to address the Climate Crisis is recognised and the City Council is fully committed to reaching, and where feasible, exceeding the relevant targets set by the government and set out in the Council's own Climate Action Plan. Furthermore, the Development Plan should seek to integrate climate action considerations into the preparation of policies across the entire plan in an effort to reduce the city's carbon footprint and to create a more sustainable future based on the 15-minute city approach. Climate Action should be an integral and cross cutting theme through the plan.

At a city wide level, the Development Plan must promote the compact growth agenda to ensure the most efficient use of urban land and greater integration of land use and sustainable transport. DCC is working with Codema to make Dublin a more energy sustainable city.

Community Participation and Education

The City Council recognises the importance of community participation in all aspects of its work and that for climate action to be effective, it must be accepted and implemented by the people of the city themselves with the support of the City Council and state agencies.

In this regard, the City Council has engaged with the citizens of the City on various levels and through many networks including: climate workshops with City

neighbourhood groups; training for businesses; and, community engagement on greening initiatives. The importance of awareness and education of climate change should be highlighted in the plan.

Energy

It is clear that a key part of our efforts to tackle the climate emergency is a switch to renewable sources and to make our current use of energy more efficient. In this regard, the Chief Executive welcomes and supports the use of renewable wind and solar energy generated either by large facilities outside the city's boundaries or by micro-renewable technologies installed in buildings in the city itself.

The development of a district heating network in the city and of the installation of district heating systems in existing and future developments in order to reduce the city's carbon footprint is also supported.

New and Existing Developments

As outlined above, the Council is committed to reducing the city's overall carbon footprint at the city level but also at the level of individual developments. It is recognised that significant new developments in particular will need to demonstrate that climate action has been comprehensively considered at design and planning stages. This requirement will be addressed as part of the Development Management process for significant residential and commercial developments in the city and a range of measures must be supported in the plan including energy use and efficiency, the greening of roofs and walls, the potential for the installation of district heating and micro-renewable systems, as well as sustainable urban drainage systems.

The matter of upgrades to Council owned social housing stock and other Council-owned buildings should be promoted in the Development Plan. It should be noted that the Development Plan will support the implementation of the City Climate Action Plan which sets out targets for the Council in relation to the energy efficiency of Council owned properties.

The Public Realm and Open Spaces

The benefits of trees, planted areas and public space in helping to reduce the city's carbon footprint, in mitigating against climate change related flooding events and in supporting biodiversity is recognised. As a result, the Development Plan should seek to safeguard existing trees and planted areas and will support the ongoing greening of the city over the period of the plan.

Sustainable Transport

Promoting and delivering more sustainable forms of transport and movement in the City will be central to the overall approach to the development of the city during the lifetime of the next plan. This approach recognises the benefits of providing better a more welcoming public realm for pedestrians, of providing better infrastructure and facilities for cyclists, of limiting the use of the private car to essential use only, and of promoting a switch to electrical vehicles.

Coastal and Surface Water Flooding

Flooding events associated with climate change will only increase and spread with extreme weather events and rising sea levels. The vital importance of preparing for, and acting to protect against climate related coastal and surface water flooding is recognised.

In addition to preparing its own Strategic Flood Risk Assessment for the next Plan, the Council will continue to work with relevant authorities such as the Office of Public Works on the identification and development of additional flood protection measures where necessary. As such, it is recommended that the Development Plan includes policies ensure that the issue of climate related flooding and to integrate sustainable urban drainage systems into their design and construction.

Waste Management and the Circular Economy

A number of submissions emphasised the role of waste management in reducing the city's carbon footprint with calls for an increased focus on reuse and recycling and better waste segregation is recommended. These matters will be addressed in the forthcoming plan with suitable policies to promote sustainable waste management. There were also calls for a move towards a Circular Economy Approach which will be supported in the new plan.

The Dublin City Council Climate Change Action Plan recognises the role that best-practice waste management and resource management can have in tackling climate change. As a result, the Development Plan must seek to ensure that the city's need for such sustainable environmental infrastructure is addressed in a way which contributes to wider climate action goals and targets.

Chief Executive's Recommendations in Relation to Climate Action

General

- Include climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, Dublin City's Climate Change Action Plan 2019-2024 and national legislation.
- Support compact growth as a means of delivering on climate action through efficient use of public transport, active travel and achieving greater energy efficiencies.
- Promote the 15 minute city approach in order to promote the sustainable, compact, and climate-resilient development of Dublin City.
- Ensure that the city's need for sustainable environmental infrastructure is addressed in a way which contributes to wider climate action goals and targets.
- Promote the development of a decarbonisation zone in the city.

Energy

- Promote and facilitate the use of renewable energy sources throughout the city including wind and solar energy and other technologies as well as the installation of micro-renewable technologies in new developments where suitable.
- Ensure the built environment is climate change ready by supporting climate change mitigation and adaptation measures into new and existing development. Support energy efficiency and conservation.
- Support the development of the district heating networks at the city level and the installation of district heating systems in significant developments where feasible.

Green Infrastructure

- Encourage measures for the 'greening' of new developments including the use of green roofs, green walls and water harvesting.

Sustainable Transport

- Promote modal change from private car use towards increased use of more sustainable forms of transport such as public transport, cycling and walking, and encourage measures such as home-working, carpooling, car sharing and the use of electric/ low emission vehicles.
- Seek to set targets to monitor the achievement or otherwise of a reduction in the city's carbon footprint.

Flood Risk

- Prepare a Strategic Flood Risk Assessment for the City and continue to work with relevant authorities on the identification and development of additional flood protection measures where necessary.
- Require significant new developments to address the issue of climate related flooding and appropriately address surface water management.

Theme 3: Quality Housing and Sustainable Neighbourhoods

Submission Number(s):

S-00424, S-00108, S-00414, S-00524, S-00727, S-00331, S-00258, S-00106, S-00257, S-00117, S-00132, S-00140, S-00142, S-00316, S-00305, S-00697, S-00066, S-00107, S-00135, S-00211, S-00329, S-00354, S-00359, S-00417, S-00250, S-00455, S-00489, S-00103, S-00071, S-00002, S-00065, S-00629, S-00567, S-00469, S-00519, S-00515, S-00552, S-00728, S-00214, S-00689, S-00686, S-00294, S-00668, S-00301, S-00662, S-00656, S-00341, S-00643, S-00007, S-00024, S-00027, S-00031, S-00033, S-00036, S-00040, S-00044, S-00051, S-00077, S-00081, S-00086, S-00087, S-00118, S-00124, S-00125, S-00010, S-00011, S-00025, S-00046, S-00047, S-00057, S-00079, S-00085, S-00095, S-00096, S-00110, S-00111, S-00129, S-00130, S-00134, S-00127, S-00137, S-00146, S-00161, S-00183, S-00187, S-00199, S-00201, S-00203, S-00205, S-00225, S-00227, S-00233, S-00240, S-00242, S-00259, S-00271, S-00273, S-00278, S-00282, S-00304, S-00308, S-00319, S-00334, S-00337, S-00343, S-00356, S-00358, S-00361, S-00362, S-00365, S-00366, S-00377, S-00378, S-00379, S-00398, S-00399, S-00411, S-00426, S-00429, S-00438, S-00439, S-00449, S-00452, S-00462, S-00467, S-00470, S-00478, S-00483, S-00490, S-00491, S-00497, S-00505, S-00507, S-00508, S-00521, S-00522, S-00527, S-00547, S-00550, S-00553, S-00561, S-00574, S-00580, S-00582, S-00586, S-00595, S-00598, S-00606, S-00608, S-00615, S-00684, S-00318, S-00148, S-00153, S-00160, S-00169, S-00174, S-00178, S-00179, S-00191, S-00193, S-00194, S-00195, S-00196, S-00202, S-00212, S-00216, S-00218, S-00220, S-00226, S-00230, S-00235, S-00243, S-00254, S-00260, S-00261, S-00264, S-00268, S-00279, S-00280, S-00281, S-00283, S-00289, S-00290, S-00299, S-00302, S-00303, S-00311, S-00330, S-00332, S-00333, S-00336, S-00345, S-00347, S-00348, S-00351, S-00353, S-00355, S-00364, S-00367, S-00368, S-00369, S-00371, S-00380, S-00389, S-00408, S-00410, S-00416, S-00418, S-00420, S-00425, S-00431, S-00433, S-00443, S-00445, S-00460, S-00464, S-00465, S-00472, S-00498, S-00503, S-00535, S-00538, S-00542, S-00549, S-00551, S-00556, S-00564, S-00566, S-00575, S-00576, S-00584, S-00600, S-00601, S-00603, S-00605, S-00619, S-00631, S-00635, S-00015, S-00245, S-00511, S-00454, S-00725, S-00664, S-00482, S-00663, S-00652, S-00651, S-00650, S-00645, S-00613, S-00563, S-00407, S-00447, S-00456, S-00731, S-00637, S-00729, S-00514, S-00626, S-00719, S-00726, S-00620, S-00647, S-00658, S-00272, S-00277, S-00694, S-00325, S-00667, S-00388, S-00428, S-00165, S-00350, S-00750, S-00712, S-00741, S-00284, S-00324, S-00523, S-00327, S-00720, S-00293, S-00326, S-00344, S-00444, S-00136, S-00437, S-00442, S-00616, S-00610, S-00695, S-00640, S-00639, S-00578, S-00560, S-00622, S-00529, S-00659, S-00660, S-00674, S-00673, S-00669, S-00162, S-00312, S-00270, S-00676, S-00692, S-00297, S-00167, S-00735, S-00742, S-00512, S-00607, S-00675, S-00743, S-00397, S-00746, S-00751, S-00752

Summary of Issues

City Centre Reinvigoration and Increased Residential Use of City Core

A number of submissions called for the reinvigoration of the city centre area by the increased residential use of the commercial core and the provision of sustainable housing through the promotion of residential use of older buildings, living over the shop and vacant buildings. Concerns were raised regarding underutilised land/vacant/derelict sites in the city which could be used for housing. It is suggested in a number of submissions that the liveability of the City Centre can be improved by the provision of a stronger residential community in the City Centre and that it needs to attract / accommodate families by providing quality urban living and affordable, diverse housing. A number of submissions stated that building on the edge of the City has reduced the attractiveness of the City Centre as a place to live and shop.

In regard to living over the shop and refurbishment of older buildings, submissions sought a review of the “Living City Initiative” and that financial incentives be provided and building regulation requirements addressed in order to allow ease of adaptation of the upper floors of buildings in the city. Several submissions sought utilisation of older buildings, including older Georgian buildings, for housing and the promotion of the adaptation and decarbonisation of existing housing stock. Incentives are sought to encourage the development of derelict sites and to increase rates/property tax substantially on vacant properties. Many submissions set out that new development should be allowed while protecting the character of urban villages and communities in Dublin City.

A number of submissions also identified the need for higher density housing, particularly in the Docklands to solve the housing crisis. There is also acknowledgement in the submissions that housing development in the urban core is more expensive to deliver but measures such as URDF/SSF and LIHAF funding can support the affordability of housing in the city. It is also suggested to formulate a Dublin City Centre Living Strategy, in partnership with the European Investment Bank and other private investment and social enterprise partners. A number of submissions requested a local area plan for specific neighbourhoods of the city which is addressed further under Theme 1 of this Report.

Student Accommodation, Co-living, Hotels, Short Term Lets and Build to Rent

A number of submissions stated their opposition to co-living, student accommodation, hotels and short term letting due to the transient nature of these accommodation typologies and their perceived over concentration and impact on existing city communities. It is requested that the terms over saturation and over intensification are quantified in the forthcoming Development Plan. An over-emphasis on transient forms of residential development and a lack of community infrastructure are considered to compound social inequality in certain parts of the city including Dublin 8 and calls are made for more affordable high quality family oriented housing and better regulation of the short-term let market. Additional restrictions on co-living are called for and a clearer vision to provide for the needs of living, sustainable communities in central areas of the City.

A number of submissions highlighted the erosion of the City Centre's population by the rise of tourist short-lets and call for more robust measures to restrict such practices including a specific policy prohibiting the conversion of residential units to short-let tourist accommodation. Concerns were also expressed as to the over provision of hotels in the City which may be impacting on housing delivery.

Several submissions called for a cap or a percentage cap on built to rent properties to ensure a good mix of sizes, from 1-beds to family-sized and for built to rent to be concentrated close to public transport hubs or further out of the City. The foreign institutional nature of landlords of built to rent properties is highlighted in a number of submissions and it is considered that people should be able to invest their housing costs back into their community by paying rent to DCC/a local landlord rather than a foreign institutional landlord.

Other submissions supported more housing of all types, including co-living and build to rent, in the City and requested less restrictive zoning and regulations for housing. The need for flexible housing solutions for young professionals, students, long-distance commuters, and project-based staff is highlighted and it is suggested that it would be appropriate to designate zones for co-living and serviced residential and to allow residential developments to be assessed on their merits and avoid prescriptive restrictions. It was also noted that build to rent development in certain urban locations such as former industrial lands in Dublin 8 can create a diverse housing offer and a secure home in a community environment.

Requirements for Sustainable City Neighbourhoods

A large number of submissions highlighted the requirements for sustainable city centre neighbourhoods including family sized apartments, recreational open spaces, direct access to public transport, high-quality mixed tenure housing, an emphasis on walking and cycling and local recycling facilities. Socially inclusive neighbourhoods and place-making are sought and the need for persons with a disability to live close to public transport and amenities is highlighted. Other submissions highlighted the need for the provision of high quality public realm, childcare, event spaces, public toilets and facilities for communities. A large number of submissions advocated the 15 minute city approach for the provision of sustainable neighbourhoods and supports to be provided for inclusive mixed tenure and intergenerational communities within 15 minute neighbourhoods.

Submissions stated that the focus should be on expanding the provision of medium density development with larger sized residential units and family oriented facilities and recreational space having regard to the need for high standards of urban design and architecture. Several submissions highlighted the need for improved residential amenity and adherence to the Urban Design Manual. Many noted that more diverse housing typologies are required particularly in the inner city and 100% social housing schemes should not be permitted with a better balance of mixed tenure housing needed.

A number of submissions emphasised the importance of the quality of apartments provided, including the importance of access to daylight, views, storage and children's play spaces in their design. Low carbon and climate resilient housing should also be provided. The Open Building approach to the design of residential buildings is highlighted which takes account of the need to change or adapt the dwelling during its lifetime, in line with social or technological change. Submissions stated that developments should respect the character and the environs of the locality where they are built with regard to height and massing and should not overwhelm existing community infrastructure. Some submissions called for housing

estates to be named in Irish only and dedicated estates for Irish speakers should be provided. Several submissions called for the provision of facilities for people to live on board boats on the city's waterways which it is stated could provide hundreds of housing units at low cost to the Council and is affordable housing.

Several submissions emphasised the need for more mixed communities in the city providing for family housing, older people, accessible housing, students, artists and providing a wide range of housing tenure types, including owner occupied, long term rental accommodation and transitional rental accommodation. The use of Strategic Development Zones and development plan led development processes are cited as good examples of planning and implementing community based sustainable development and there should be meaningful engagement with communities for large housing developments. The importance of upfront investment to ensure the provision of infrastructure, transport links and public services for all developments is emphasised and community-scale healthcare, education, local retail, pharmacies and parks should be provided in each neighbourhood.

A number of submissions called for the revitalisation of suburban neighbourhoods by bringing services and employment from the City Centre to local areas. It was noted that there is a need to ensure residential development is at sustainable urban densities in urban villages and does not affect the character and scale of existing streets and houses. Densification in urban villages can be implemented through the conversion of underutilised commercial properties, living over the shop and restoring derelict buildings. Submissions also called for the retro-fitting of residential properties to lessen their climate impact and to reduce water use and to ensure that community facilities are centrally located and easily accessible.

Submissions also highlighted that due to the impacts of the Covid-19 pandemic and the number of people working from home, shared/rental office space in new developments and live work units should be encouraged.

The need to provide for socially inclusive neighbourhoods is also emphasised in submissions, including supporting ethnic minority communities, homeless people and people with disability needs. A submission by Pavee Point Traveller and Roma Centre calls for the Council to prioritise the provision of Traveller Accommodation and that a detailed census is carried out to establish the need for Traveller accommodation, to be fully incorporated into the development plan.

A submission by the IWA makes a number of recommendations including that the Development Plan includes Irish Wheelchair Association's Think Ahead, Think Housing campaign in their housing strategy and that the plan commits that all social housing projects supported by capital funding from the Department of Housing, Planning and Local Government deliver 7% of integrated fully wheelchair accessible social housing units within choice locations that are accessible to community amenities and transport links. The IWA also recommends that the Council promotes IWA Best Practice Access Guidelines (4th Edition) as a standard of choice in all new building designs and the promotion of innovative housing design models.

A submission by the NDA highlights the increased need for social housing with a greater emphasis on creating liveable and sustainable neighbourhoods, where

persons with disabilities can be part of a community. The universal design approach to homes is also emphasised to meet everyone's needs through flexible homes designed to adapt to a person's lifecycle and lifestyle patterns of people over time. NDA Guidelines are referred to including "Universal Design Guidelines for Homes in Ireland" and "Dementia Friendly Dwellings for People with Dementia, their Families and Carers".

A submission by An Post requested that the Council consider their existing and future operational requirements and include appropriate policies to support An Post's ambition to enhance postal facilities in Dublin City, including supportive policies to facilitate enhanced postal services in the City over the 6-year Development Plan period.

Sustainable Neighbourhoods for Young People

A large number of submissions emphasised the importance of childcare, play spaces, youth facilities, school provision and higher education for communities in Dublin. Several submissions called for more affordable community crèches and facilities for special needs children and commitments to planning and designing urban public space to be safe and welcoming for children and young people. There is a need for the provision of more playgrounds and adjacent disability playgrounds within communities and the importance of universal access to safe and inclusive public spaces for women, children, older persons, persons with disabilities is emphasised.

Several submissions called for sustainable school planning and the need to ensure sufficient school provision in city neighbourhoods. Large-scale residential development should be subject to school capacity assessment and there is a need to ensure sufficient land is zoned and retained for schools to meet projected population growth. A submission by the Department of Education requested that the development plan be explicit in its support for the provision of school accommodation, including the development of new schools and the expansion or alteration of existing ones and that explicit provision for school development to meet projected population growth be made in existing "built-up" areas.

A submission called for the removal of Objective SNO4 from the Draft Development Plan regarding the provision of a new school site at the Smurfit Complex on Botanic Road. It was considered that the objective is obsolete and should be removed.

A number of submissions called for increased youth facilities to be provided in the City. Youth friendly, accepting environments where young people can feel safe and comfortable through the provision of sustainable social infrastructure should be supported including facilities for children and youth services, family support programmes, public health services, community development and education development including non-school based initiatives.

The importance of further and higher education in Dublin is also emphasised and submissions called for measures to ensure that Dublin grows as a student city with access to appropriate housing and amenities and a more planned approach to student housing. With regard to higher education, detailed submissions were received from Griffith College and Trinity College Dublin (TCD) which call for

measures to sustain and enhance the contribution and importance of the colleges, their campuses and facilities to the city.

Sustainable Neighbourhoods and Housing for Older People

A large number of submissions highlighted the need to meet older people's needs in the community with reference to housing, mobility, the public realm and the need to incorporate the Age Friendly Cities Approach. There is a need to provide varying levels of support according to older people's needs in relation to housing and retrofitting including adaptations and energy efficiency. In planning for residential communities, the age profile in areas should be considered and greater diversity of house types provided, including the promotion of step down accommodation and a quota in areas for smaller houses for people to downsize. Older peoples' homes need to be fit for purpose by designating housing for older people, building sheltered housing and piloting family home extensions/renovations such as that designed by the Ava group. Several submissions noted that better provision needs to be made for older community members in terms of dementia management and other specialist facilities to support their self-sufficiency.

A submission by the Dublin City Council Housing SPC and Services to Older Persons Working Group made a number of recommendations including identifying the proportion of older people in Dublin City, making Universal Design a central feature of the Development Plan, a requirement for a new Age Friendly City Strategy to be completed and to ensure that new social housing units and a proportion of existing units in all areas are adaptable to meet housing choice for all.

A submission by Ava Housing recommended that the Development Plan supports the principles of the Ava Housing model, enabling older homeowners to reconfigure their family-sized homes in a way that meets the needs of an ageing population, creates new single occupancy rentals in an efficient and sustainable way, promotes intergenerational living and helps to regenerate mature urban neighbourhoods.

Healthy Place-making and Well-being

Healthy place-making is emphasised in a large number of submissions including the continuing need to improve the health and well-being of the people of Dublin through the provision, maintenance and promotion of art, culture, sporting, play and recreation facilities at neighbourhood level. Submissions also called for the well-being of those with accessibility needs, dementia sufferers and older people to be addressed and to seek to improve public health and well-being through the design of the built environment. A submission called for adoption of the Healthy Streets Approach to promote healthy placemaking and to pursue accreditation from the World Health Organization for inclusion in 'The Healthy Cities Project'.

A submission by the Irish Heart Foundation advocated that the Development Plan has at its core the concept of upstream intervention; the idea of taking preventive actions that would steer away from potential detrimental health effects such as chronic diseases, injuries, and premature death and makes a number of recommendations including the promotion of a healthy environment as a strategic goal in the Development Plan. The submission stated that reference should be made to four policies in the plan in this regard: the cross-government public health framework Healthy Ireland, A Framework for Improved Health and Wellbeing 2013-

2025, A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 –2025 and the local government policy Local Area Plans - Guidelines for Planning Authorities.

Housing Affordability

A large number of submissions called for affordable housing to be provided for all age groups and all income levels, with consideration given to apartment standards allowing for more affordable apartments, appropriate building heights at c.6 storeys and a specific zoning/land designation for affordable housing. It is stated in a number of submissions that the HNDA should be used as an evidence base to inform tenure mixes, typologies, residential amenities and land supply and that self-build co-operative housing projects should be supported. Regulations should be eased for the conversion of unused office space to residential and the Living City Initiative should be reviewed in order to allow for more affordable housing in the city.

The O'Cualainn housing development in Ballymun is cited as a preferred housing model of housing and the Vienna model of housing, using a cost-rental approach, should be supported. Active Land Management is emphasised for appropriate housing supply and affordability and several submissions call for rental caps and controls for housing.

Homelessness

Several submissions highlight the problem of homelessness in the City and support for the Housing First approach. Several submissions highlight the need for affordable infrastructure in order to meet the needs of citizens who are homeless and/or effected by the housing crisis and that the development plan should include the need of supports /services for marginalised people, those who are homeless /in hostel accommodation or at risk of homelessness.

Social/Public Housing

A large number of submissions call for the Council to build social, affordable and cost rental housing on public land and oppose the transfer of public land to developers. A submission calls for the Council to publish the location and extent of all its residentially-zoned undeveloped lands, so that their potential for the delivery of housing can be explored.

Other submissions call for Part V exemption clauses on sites less than 1,000 sq. m. to be removed and for the Council to make representation to Government on same. A submission identifies Z12 and Z15 zoned lands as significant existing undeveloped landbanks where more could be done by the Council to bring these zones in to more sustainable use through the creation of new residential communities ensuring housing needs are met for the plan period. The submission also suggests that the City Council should review the existing contribution of Z12 and Z15 sites towards the delivery of housing within the City boundaries and consider the potential rezoning of some of these primarily to Z1 Residential Zoning.

A submission by the Irish Council for Social Housing states that the Development Plan must address the need for the City Council to be able to assemble sites for social and affordable housing delivery using all mechanisms at its disposal including CPO, vacant sale orders and any other anti-speculative measures that can be adopted or devised to ensure the availability of land at reasonable cost. It states that

the roll-out of cost rental housing at scale on publicly owned land is vital and AHBs are well placed to ensure cost efficiency in the management and maintenance of cost-rental housing schemes.

Chief Executive's Response in Relation to Quality Housing and Sustainable Neighbourhoods

City Centre Reinvigoration and Increased Residential Use of City Core

The Council acknowledges the need to support and strengthen all city centre uses, including residential and commercial, and to ensure the liveability and attractiveness of the City Centre as a destination and as a place to live. The Draft Plan will be informed by the RSES which includes a detailed Dublin Metropolitan Area Strategic Plan (MASP) which identifies strategic development and employment areas for population and employment growth in addition to more generalised consolidation and re-intensification of infill, brownfield and underutilised lands within Dublin City. The MASP directs future growth to identified Strategic Development Areas located on existing and planned strategic public transport corridors.

With regard to underutilised sites in the city, it is envisaged that the plan will seek to strengthen the approach adopted under the current Development Plan and identify key strategic development and regeneration areas in the city that are appropriate for intensive residential and mixed use development. The plan will propose appropriate guiding principles for the future development and enhancement of such areas in accordance with the principles of compact growth and will also identify key opportunity sites for development within such areas. Proactive active land measures will be recommended to reduce vacancy and underuse of existing building stock as well as support for the refurbishment and retrofitting of existing buildings. The Draft Plan will recommend appropriate policies and objectives to promote a compact urban form including higher residential densities and will identify appropriate locations including the Strategic Development Areas where such density can be optimised. Measures to enable implementation of the Core Strategy of the Development Plan will include the Council actively seeking funding from Government-led schemes including LIHAF (Local Infrastructure Housing Activation Fund) and URDF (Urban Regeneration Development Fund).

Student Accommodation, Co-living, Hotels, Short Term Lets and Build to Rent

The concerns expressed in submissions regarding over concentration of certain development patterns in the city are noted. It is also acknowledged that hotel and student accommodation development in the city have played an important role in providing quality accommodation for the student and tourist sectors with positive impacts regarding the availability of housing stock in the private residential sector to meet housing demands. Such schemes have also in many instances had transformative regeneration benefits. The matter of overconcentration will be considered further in the Draft Development Plan and any policy provision underpinned by a robust evidenced based approach. It is the council's objective to promote balanced, sustainable and mixed use development in the city.

With regard to housing need, it is intended to carry out an evidenced based HNDA as part of the review process that will inform the Housing Strategy/Core Strategy and which will guide policies and objectives in the Draft Plan. It is intended that the

HNDA will allow for consideration of housing mix in the forthcoming plan. In regard to co-living/shared accommodation development, updated “Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities” December 2020 include a Specific Planning Policy Requirement (SPPR) for a presumption against granting planning permission for co-living/shared accommodation development unless the proposed development is required to meet specific demand identified by a local planning authority further to a HNDA process.

The Build to Rent form of residential accommodation adds to the mix of housing typology in the City and the forthcoming Plan will include policy on same. Recommendations with regard to this type of accommodation may come from the future Housing Need and Demand Assessment (HNDA) and the forthcoming Plan will contain policies on the appropriate location for this specific housing typology. Development Plan guidance will also be required to ensure that these denser developments have a commensurate level of amenities and facilities to ensure high quality living environments for future occupants. Denser developments may also impact on the carrying capacity of existing social and community infrastructure and this is a matter that will need consideration in the forthcoming Development Plan to ensure both sustainable use of urban land and the creation of quality places to live.

It is acknowledged that short term residential lettings in the City have increased substantially since publication of the last Development Plan but have declined since Covid 19. Planning legislative reforms were provided in 2019 to regulate the short term letting sector - as provided for in the Residential Tenancies (Amendment) Act 2019 and the Planning and Development Act 2000 (Exempted Development) (No. 2) Regulations 2019. Policies will be provided in the forthcoming Development Plan to further regulate the short term letting sector.

Requirements for Sustainable City Neighbourhoods

The City Council acknowledges that residential sites must be developed in a manner that contributes to the establishment of viable, integrated and successful neighbourhoods and communities. A suite of measures will be recommended in the draft development plan to promote high quality and sustainable development that aligns with the principles of the 15 minute city, healthy placemaking and that include high quality amenities and open spaces, adequate social and community infrastructure and that cater for a variety of people and households.

The Development Plan acknowledges that good neighbourhoods require a range of services and facilities and that there should be optimum use of such facilities. The 2016 Development Plan provides a policy to ensure that all applications for significant large new developments (over 50 units) must be accompanied by a social audit and an implementation and phasing programme in relation to community infrastructure, so that facilities are identified as needed are provided in a timely and co-ordinated fashion. Further consideration will be given to how improved use can be made of existing infrastructure.

The Council acknowledge the important role of suburban neighbourhoods, their potential to act as focal points for existing and new communities and that there is further scope to regenerate and revitalise such centres. It is proposed that the plan will identify key urban villages within the city and set out proactive policies and

measures to ensure the future development, enhancement and consolidation of these areas in line with the principles of the 15 minute city.

The need to create neighbourhoods which are designed to cater for all age groups, all abilities, and all ethnic and cultural groups is a key priority of the City Council. Such an objective can be supported in the Development Plan via a range of policies including universal access, designing for safety, ensuring there is a variety of spaces and places for people to interact within a neighbourhood and ensuring a diversity in house types and tenures. The overarching aim of these policies is to ensure that places are attractive and welcoming for all. The City Council's Departments of Culture, Recreation, Amenity and Community Development, and International Relations and Social Inclusion Section remain committed to carrying out a wide range of programmes and services to embrace diversity and foster social inclusion.

The 2016 Development Plan provides a policy to highlight the profile of the Irish language in the urban environment, and support the Irish language as reflected in local history/ folklore/place-names and that such place names are stated in Irish. Further consideration will be given to how to support the Irish language in the city. House boats will be given consideration as a housing typology in the review of the Development Plan.

Dublin City Council supports and recognises the necessity of universal access and the incorporation of lifetime design principles into all developments. Existing standards, policies and objectives will be reviewed to ensure they are in line with current best practice and advice on accessibility, including the Irish Wheelchair Association's (IWA) Think Ahead, Think Housing campaign, the IWA Best Practice Access Guidelines (4th Edition) and the National Disability Authority's guidelines including "Universal Design Guidelines for Homes in Ireland" and "Dementia Friendly Dwellings for People with Dementia, their Families and Carers". The City Council recognises the importance of An Post's postal services in the city and will give consideration to appropriate planning policy to support and facilitate enhanced postal services in the City.

Sustainable Neighbourhoods for Young People

Dublin City Council supports and recognises the necessity of providing sustainable neighbourhoods for young people, including supporting childcare facilities and planning and designing public space to be safe and welcoming for children and young people. The 2016 Development Plan provides a policy to facilitate the provision in suitable locations of sustainable, fit-for-purpose childcare facilities in residential, employment, and educational settings, taking into account the existing provision of childcare facilities and emerging demographic trends in an area. Further consideration will be given to how to support childcare facilities in the city and to ensure public spaces are designed to be safe and welcoming for children and young people.

Coordinating the provision of schools with areas experiencing a growth in population is essential to achieving a sustainable urban environment. The City Council has prepared Local Area Plans and Strategic Development Zones for those parts of the city which are likely to see significant future development and has earmarked locations for new schools as part of this plan making process. Elsewhere within the

City all large scale developments (in excess of 50 new residential units) must be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand. Compliance with current Department of Education and Skills Technical Guidance documents will be required. The sharing of schools facilities, for community use and for life-long learning opportunities, should remain a policy of the Development Plan. Objective SNO4 will be reviewed as part of the preparation of the Draft Development Plan with regard to the provision of a new school site in the locality of Botanic Road.

Student accommodation development in the city has played an important role in providing quality accommodation for the student sector with positive impacts regarding the availability of housing stock in the private residential sector to meet housing demands. Standards and requirements of the Development Plan relating to student accommodation will be reviewed as part of the preparation of the Draft Development Plan in order to promote high quality, appropriately located accommodation, including purpose-built accommodation with supporting facilities.

Sustainable Neighbourhoods and Housing for Older People

The 2016 Development Plan provides policies to ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner and to support the concept of independent living and assisted living for older people, to support the provision of specific purpose built accommodation, and to promote the opportunity for older people to avail of the option of ‘downsizing’. Further consideration will be given as to how to meet older people's needs in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland’s “Age Friendly Principles and Guidelines for the Planning Authority 2020.”

With regard to housing need, it is intended to carry out an evidenced based Housing Needs Demand Assessment as part of the review process that will inform the Housing Strategy/Core Strategy and which will guide policies and objectives in the Draft Plan. It is intended that the HNDA will allow for consideration of housing mix in the forthcoming plan, including housing for older people. Consideration will be given to the Ava Housing model during review of the Development Plan.

Healthy Place-making and Well-being

The NPF and RSES both promote healthy placemaking and support the objectives of public health policy. The development plan will include a range of policies and guidance aimed at protecting the environment, open space provision and encouraging high quality design of both the built environment and public realm, including those with accessibility needs. The plan will include specific policies and objectives in relation to healthy placemaking.

The City Council recognises the continual need to protect, create and enhance more green and blue spaces in order to achieve a more liveable city that promotes healthy lifestyles and make the city greener and healthier for all. The improved health and wellbeing of the citizens of Dublin through recreation and activity will be promoted with greater policy support in the Draft Plan.

Housing Affordability

The Housing Need and Demand Assessment (HNDA) will inform Development Plan policy responses about the future location, typology and tenure of housing needs, which in turn will inform the provision of a sufficient land supply in the right locations to deliver future additional housing.

As identified in the RSES, the development of a new affordable 'cost-rental' sector has been identified as part of the reform of the Irish housing system. In this regard, it is recommended that the plan will include proactive policy to support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring new models of low cost rental and affordable homeownership. Consideration will also be given to supporting policies for co-operative type housing in the city. The Development Plan will also 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.

Homelessness

The problem of homelessness requires an inter-agency approach to tackle it and provide housing options for those who need it. In line with the Regional Spatial and Economic Strategy (RSES), policies should be included in the forthcoming Plan to support the implementation of the 2019 to 2021 Homeless Action Plan and support related initiatives to address homelessness, including the work of the Dublin Region Homeless Executive. Consideration will be given to a supporting policy for the Housing First National Implementation Plan 2018-2021.

Social/Public Housing

The Housing Land Initiative Programme by Dublin City Council allows for procurement of housing development on Dublin City Council owned sites through competitive dialogue with tight control over the developments via a contractual development agreement. Three prime sites have been identified as part of the Housing Land Initiative Programme, located at O'Devaney Gardens, Oscar Traynor Road and Saint Michael's Estate providing a mix of social housing, private housing and affordable purchase. The City Council currently has overall responsibility for a total of approximately 80 social housing projects, these being at varying stages of development and using a range of delivery mechanisms.

Dublin City Council is also charged with piloting a cost rental development and has identified four potential developments for further cost rental schemes and eleven developments identified for affordable purchase homes. In addition to Dublin City Council housing delivery and acquisitions, the Council collaborates with Approved Housing Bodies (AHBs) to deliver social housing to accommodate individuals and families on the City Council's social housing waiting lists. Since 2018, 2,688 public housing units have been delivered with another 11,491 units currently in the pipeline across all schemes. The centrality of local authorities to delivering housing is recognised in Our Shared Future, the June 2020 Programme for Government and, among other priorities, the emphasis is on developing sustainable, mixed tenure communities.

A Housing Strategy will be prepared as part of the forthcoming Plan which is required to provide for the housing of the existing and future population of the area. Issues to be taken into account include the existing need and likely future need for social housing; the need to ensure that housing is available for persons who have different levels of income; the need to ensure that a mixture of house types and sizes is developed to reasonably match the requirements of the different categories of households; and the need to counteract undue segregation in housing between persons of different social backgrounds. It is intended to carry out a Housing Needs Demand Assessment to provide robust evidence base to support decisions and inform policies about new housing supply, including the proportion of social housing required, the need for different types and sizes of provision, specialist housing and housing related services. As part of the Development Plan review, consideration will be given to publishing the location and extent of Council-owned residentially-zoned undeveloped lands, so that their potential for the delivery of housing can be explored.

Chief Executive's Recommendations in Relation to Quality Housing and Sustainable Neighbourhoods

Increased Housing Provision

- Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:
 - encourage infill / brownfield development,
 - focus growth on the city's designated strategic development areas identified in the Metropolitan Area Strategic Plan (MASP),
 - promote increased densities along public transport corridors.
- Ensure that the Housing Strategy recognises the diverse needs of all of Dublin City's citizens meeting, insofar as is feasible, their diverse accommodation needs.
- Accelerate the availability of lands ready for residential development by aiming to address current infrastructural deficits where these are known to be delaying residential development.
- Promote residential development addressing the current shortfall in housing provision and meeting target guidance figures, through a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, and vacant and underutilised sites.

Homelessness

- Continue to implement the Homeless Action Plan and support related initiatives to address homelessness, including the work of the Dublin Region Homeless Executive. Consideration will be given to a supporting policy for the Housing First National Implementation Plan 2018-2021.

Student Accommodation/Upper Floors/Build to Rent/Short Term Lettings

- Review all standards and requirements relating to student accommodation in order to promote high quality, appropriately located accommodation, including purpose-built accommodation with supporting facilities.
- Address the matter of overconcentration of accommodation type uses in the city and any policy provision to be underpinned by a robust evidenced based approach.
- Bring forward policies which will encourage upper floor conversions into apartments.
- Bring forward policies to address the Build to Rent form of residential accommodation in the City.
- Provide policies in the forthcoming Development Plan with regard to the short-term letting sector.

Social Inclusion/Social/Public Housing

- Support and promote social inclusion in line with national and regional policy.
- Promote policies and objectives that support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's "Age Friendly Principles and Guidelines for the Planning Authority 2020."
- Consider supporting a housing model whereby older homeowners can reconfigure their larger homes, creating a new rental unit.
- Include proactive policy to support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring new models of low-cost rental and affordable homeownership. Consideration will also be given to supporting policies for co-operative type housing in the city.
- Existing standards, policies and objectives will be reviewed to ensure they are in line with current best practice and advice on accessibility, including the Irish Wheelchair Association's (IWA) Think Ahead, Think Housing campaign, the IWA Best Practice Access Guidelines (4th Edition) and the National Disability Authority's guidelines including "Universal Design Guidelines for Homes in

Ireland" and "Dementia Friendly Dwellings for People with Dementia, their Families and Carers".

Community Infrastructure/Placemaking

- Support policies and objectives that protect and enhance existing community resources and support the development and expansion of new facilities and services in proximity to the populations they serve where their need is identified, and resources allow.
- Promote the creation of high quality places to live and that endorse the principles of healthy placemaking and the 15-minute city.
- Promote the preparation of social infrastructure audits for large-scale developments which will inform policy on infrastructure provision within the City.
- Continue to work in collaboration with the Department of Education on all matters relating to the identification of suitable sites and the Department's delivery of new and extended schools and supporting facilities within the City. The sharing of schools facilities, for community use and for life-long learning opportunities, should remain a policy of the Development Plan.
- Review Objective SNO4 of the Dublin City Development Plan 2016-2022 as part of the preparation of the Draft Development Plan with regard to the provision of a new school site in the locality of Botanic Road.
- Promote the development of childcare facilities and to ensure that public spaces are designed to be safe and welcoming for children and young people.

Theme 4: The City Economy

Submission Number(s):

S-00414, S-00424, S-00331, S-00108, S-00727, S-00099, S-00048, S-00128, S-00135, S-00211, S-00255, S-00357, S-00030, S-00065, S-00404, S-00552, S-00728, S-00020, S-00080, S-00688, S-00686, S-00668, S-00662, S-00015, S-00060, S-00079, S-00007, S-00009, S-00114, S-00148, S-00160, S-00161, S-00192, S-00196, S-00199, S-00202, S-00261, S-00268, S-00290, S-00332, S-00346, S-00361, S-00366, S-00373, S-00379, S-00385, S-00398, S-00409, S-00443, S-00462, S-00470, S-00490, S-00520, S-00522, S-00550, S-00553, S-00570, S-00575, S-00596, S-00603, S-00606, S-00615, S-00174, S-00178, S-00194, S-00205, S-00218, S-00226, S-00230, S-00233, S-00234, S-00242, S-00243, S-00254, S-00264, S-00273, S-00320, S-00348, S-00399, S-00408, S-00439, S-00440, S-00545, S-00579, S-00582, S-00586, S-00595, S-00605, S-00684, S-00664, S-00663, S-00652, S-00651, S-00170, S-00407, S-00152, S-00447, S-00731, S-00637, S-00729, S-00719, S-00693, S-00726, S-00618, S-00658, S-00137, S-00277, S-00325, S-00352, S-00388, S-00694, S-00428, S-00517, S-00750, S-00741, S-00187, S-00284, S-00523, S-00720, S-00444, S-00610, S-00640, S-00529, S-00674, S-00673, S-00669, S-00665, S-00433, S-00139, S-00270, S-00676, S-00167, S-00742, S-00512, S-00485, S-00743, S-00466, S-00751, S-00633

Summary of Issues

Strategic Considerations

Submissions called for changes relating to the management of the city in the form of a directly elected mayor for Dublin and for the appointment of a city economist. Submissions also drew attention to broader challenges facing the city's economy and called for measures to align economic growth with biodiversity and climate action considerations and to address the pressing issue of housing affordability. A number of submissions raised the principles of resource efficiency and the circular economy and called for the circular economy to be embedded within the Development Plan.

Submissions highlighted the importance on the Dublin Belfast Corridor and north-south integration on the island of Ireland and there was also a call for greater links to be fostered with other cities in the European Union.

With regard to the overall economic priority for the development of the city, submissions highlighted the need to balance the need to make the city more attractive to FDI but also to make it attractive for people already living in the city. Numerous submissions called for a more diversified economy with decreased dependency on the FDI sector.

In terms of economic development across the city as a whole, submissions pointed to a perceived 'hollowing' out of the City Centre, especially as a result of the Covid-19 emergency, and have called for a greater emphasis on residential, entertainment and cultural uses in the City Centre over retailing and office uses. Submissions also

noted the evolution of areas outside the City Centre and have called for a better mix of economic uses in suburban areas, including more home and shared-office space.

Offices

A number of submissions maintained that larger scale office developments will continue to play a significant role in generating employment opportunities and make a valuable contribution to the city's international competitiveness. These submissions supported higher and denser development as well as the continued availability of modern office space and high speed internet in order to facilitate new entrants to the existing high tech clusters.

Other submissions have highlighted the impact of the Covid-19 emergency on where people work and called for the investigation of current office provision levels, for more office sharing and smaller, more flexible office spaces and hubs as well as for the provision of additional workspaces in suburban areas.

Regeneration and Vacancy

Numerous submissions called for the regeneration, renovation and revitalisation of specific areas of the city including Dorset Street, Moore Street, the Liberties, the Diageo/Guinness lands, the area around St. James' Hospital and also Phibsborough. A small number of submissions referenced the future use of Z6 lands and the need to have regard to the needs of established uses in these areas.

Others sought the redevelopment of Z6 lands for more intensive uses. The issue of vacancy, dereliction and underuse of existing buildings was raised by a large number of submissions, leading to calls for the introduction of measures such as punitive use it or lose it charges, changes to the vacant sites and rates system, the reuse of currently underutilised buildings and spaces and for measures to encourage living-above the shop.

Placemaking and Transport

Many of the submissions referenced the need to continue to undertake improvements to the public realm in order to encourage economic activity. The types of improvements that were called for included safer streets/safer trails for tourists, provision of better public facilities such as water fountains, toilets and bins, the development of new pedestrianised areas and areas for outdoor dining and for changes to make it easier to use outdoor spaces for a range of activities, including commercial activities.

In addition, various submissions highlighted the importance of public transportation and sustainable transport infrastructure to the city's economy. Others called for more restrictions on car parking and on the pedestrianisation of more areas of the City Centre.

Local Enterprise and the Community

A large number of submissions emphasised the importance of locally owned businesses and shops and called for the provision of more space for craft based businesses and casual traders. Many submissions also called for measures to encourage food and other markets across the city, but particularly in historical market areas such as Newmarket and Smithfield.

Numerous submissions called for measures to ensure that the economic development of the city serves all of its citizens and for efforts to be made to tackle concentrations of inequality and disadvantage in areas such as the City Centre and in Dublin 8 and to provide economic opportunities for local people associated with the redevelopment of their areas.

A number of submissions called for the adoption of principles of Community Wealth Building (CWB), participative budgeting and Community-led Local Development (CLLD) with specific reports from the NESC on Economic Resilience in Sustainable Communities and from the IPA on participatory budgeting. In addition, a submission from REHAB, called for a commitment from Dublin City Council to adopt and implement an exemplar/pilot project employing disabled and disadvantaged people.

Tourism, Events and the Night Time Economy

The central role played by tourism in the city economy was raised in a large number of submissions. The submission from Fáilte Ireland outlined challenges facing the sector and set out key priority areas including the re-imaging of urban spaces; the development of the night time-economy; the provision of adequate levels of accommodation for tourists; and the development of business tourism.

The Fáilte Ireland submission called for a chapter of the plan to be dedicated to tourism and detailed some of its key initiatives including: the development and marketing of tourism attractions; the carrying out of a Character Area Mapping exercise for the city; the development of a Dublin City Canals Greenway and of a Dublin Coastal Trail; the implementation of the Docklands Visitor Experience Development Plan and Smart Tourism initiatives.

Other submissions related to the issues and initiatives outlined above and included calls for the establishment of strategic zones of cultural importance, the need for a more varied and higher quality tourist offering including markets and gourmet tourism, tourist trails, urban rambling and cycling as well as cultural activities.

In this respect, various submissions called for measures to support and further develop the night time economy and to protect existing cultural venues such as the RDS but also to encourage the development of more small to mid-sized conference and concert venues.

Submissions also raised issues regarding the interaction between the tourist-related uses and developments and the city as a whole with concerns expressed as to the potential danger for the city to become 'over-touristed' and to the over provision of hotel developments and short-term lets.

Training, Education and Medical Sector

Another important economic sector addressed by submissions was that of training and education and there were calls for more to be done to ensure sufficient training is provided for people in disadvantaged areas and for the provision of additional vocational training facilities.

With regard to higher education, detailed submissions were received from Griffith College and Trinity College Dublin (TCD) which emphasised the vital role the sector

plays in the city's economy. The Griffith College submission stressed the need to make third level education more accessible to all, while the TCD submission called for measures to sustain and enhance the contribution and importance of the College and its City Centre campuses and facilities to the City.

There were a number of submissions which focused on the important role that medical and health-sciences sector plays in the city economy and included a reference to the potential for synergies associated with the development of the St. James's Campus as evidenced by the SMART 8 health initiative with the Digital Hub and Dublin City Council.

Dublin Port

A number of submissions were received in relation to the development of Dublin Port, some of which called for the relocation of the Port and others which referenced the viability of providing additional cruise liner berths at the Port.

The Dublin Port Company itself submitted a detailed submission which sets out the long term intention to continue the development of the Port at its current location. It also highlighted the role the Port plays as a major tourism gateway, providing both passenger ferry services and berths for cruise ships. However, the submission also states that it is intended that the Port will continue to prioritise cargo shipping and will not develop additional berths to accommodate the largest cruise ships.

Chief Executive's Response in Relation to the City Economy

Strategic Considerations

While the operational organisation of the City Council is not a Development Plan matter, it should be noted that an elected Mayor is in place and that the Council's has a dedicated Economic Development and Enterprise Department. Some submissions also referred to a Mayor directly elected by the public. This requires separate legislative provisions and is outside the scope of the Development Plan.

The Chief Executive recognises the need to ensure that the Development Plan's strategic vision and strategy for the city economy responds to the pressing challenges identified in the submissions such as housing provision, placemaking, climate change and bio-diversity amongst others. As a result, the City Economy chapter of the plan will inform and be informed by other relevant chapters which address these issues in detail.

The position of submissions which emphasises Dublin's wider role both in the context of all-Ireland and wider pan-European relations is agreed with. To this end, the Development Plan will support the development of the newly launched Dublin-Belfast initiative and will explore measures by which the city can establish closer links with other European countries.

While the Chief Executive agrees with the sentiment expressed in a number of submissions that the city economy should be as diverse as possible, the importance of the foreign direct investment sector to both the city and the national economy should not be underestimated. The Development Plan will seek to support local

business while continuing to strive to make Dublin as attractive a destination for foreign direct investment as possible.

As demonstrated by numerous submissions, the Covid-19 emergency has led to a reassessment by many of the city's inhabitants of how they interact with the city's economy in terms of where and how they work, shop, socialise and spend their leisure time. It is considered that the adoption of a 15 minute city approach as part of the overall Development Plan strategy will help to create a suitable balance between the need for a wide range of economic activities to be provided at a local level, while enabling the continued provision of higher order activities in significant employment clusters, and in particular, in the City Centre.

Offices

The City Council is fully committed to ensuring that Dublin remains, and becomes more internationally competitive in providing a world-class business environment for new and existing companies. The Development Plan will seek to support these overall objectives by supporting the continued development of well-serviced office floorspace of varying scale in suitable locations. It will also examine the potential for the provision of more flexible office spaces and hubs as well as for the provision of additional workspaces in suburban areas where appropriate.

Regeneration and Vacancy

The issues of regeneration and vacancy are a central policy concern as evidenced by the identification of Strategic Development and Regeneration Areas in the current plan and the preparation of a comprehensive Vacant Sites register for the city as just two examples.

The next Development Plan will build on these initiatives and also identify a number of additional Strategic Economic Development Areas for the city as well as facilitating the regeneration of areas for which the Council has secured considerable funding as part of the government's URDF programme. The Plan will also continue to provide support for the living above the shop scheme and will seek to enable public realm and sustainable transportation infrastructure improvements to address existing shortcomings where possible.

Placemaking and Transport

The vital role that placemaking plays in fostering economic development by providing an environment which is attractive to current and prospective employers and employees is acknowledged. In a similar way, the availability of high quality sustainable transportation infrastructure greatly contributes to a city's economic competitiveness. The Development Plan will provide the necessary policy framework by which these objectives can be achieved in order to support the continued growth of the city's economy.

Local Enterprise and the Community

It is noted that a considerable number of submissions called for measures to support and encourage locally owned and craft-based businesses. As demonstrated by the ongoing work of its Local Community Development Committee Local Enterprise Office, the Council is fully committed to assisting this important and growing sector of

the local economy. The Council is also committed to tackling the problems of inequality and disadvantage across the city.

In order to further these aims, the Development Plan will have regard to the policies and initiatives contained in the current Dublin City Local Economic Community Plan (LECP) which sets out a series of key strategic goals that will inform the future local economic and community development of Dublin City.

With regard to Community Wealth Building (CWB), participative budgeting and Community-Led Local Development (CLLD) and the implementation an exemplar/pilot project employing disabled and disadvantaged people, while it is not possible to address these issues directly as part of the Development Plan process, the Council is supportive of measures to increase the participation of community groups, disabled and disadvantaged people in the city economy.

Tourism, Events and the Night Time Economy

The detailed submission from Fáilte Ireland is welcomed and it will be ensured that the City Economy chapter of the Development Plan supports the ongoing efforts and initiatives of the organisation to develop Dublin's tourism sector in these extremely challenging times.

The large number of submissions which also called for support to be provided for the expansion and further development of a higher quality 'tourist offer' which would benefit not only visitors to the city but also the people of Dublin themselves is welcomed. It is noted that there were a number of submissions relating to the need to protect existing cultural venues and to further develop the night time economy and the Development Plan will provide specific policy supports relating to these issues in a dedicated chapter on the city's Culture.

The concerns expressed in a number of submissions as to the over-provision of tourism-related 'short-lets' and to the development of significant numbers of additional hotel rooms in the City Centre is noted. As a result, the Development Plan will include provisions to prevent the full-time use of houses or apartments as short-term lets. With regard to over concentration of hotel accommodation, it is acknowledged that there is a need to provide high quality tourist accommodation to meet the needs of the tourist sector in the city. The provision of same also has a role to play in reducing the demand for the short term rental of private housing stock. It is acknowledged however, that there needs to be a balanced approach to land use development and mix in the City and this matter will be given further consideration in the forthcoming Draft Plan.

Training, Education and Medical Sector

Another important economic sector addressed by submissions was that of training and education and there were calls for more to be done to ensure sufficient training is provided for people in disadvantaged areas and for the provision of additional vocational training facilities.

With regard to the training and education sectors, the role education plays in addressing economic disadvantage and in providing the high quality labour force which makes Dublin so attractive to leading international and national companies is

recognised. The Development Plan will have regard, therefore, to the strategic approach of the LECP and to the overall need to sustain and enhance the contribution and importance of leading academic institutions.

The importance of the hospital and health sciences sector and the unique opportunity for the development of a new health related cluster around the St. James' campus is also acknowledged. The Development Plan will seek to promote and support the potential of this area as the focus for health-related economic activity.

Dublin Port

The considerable economic contribution Dublin Port makes to the city's economy is valued and it is recognised that the Port is a crucial part of the Dublin's strategic economic infrastructure. The Development Plan will include policies to support the ongoing development of the Port having regard to wider transport and infrastructural considerations for the Dublin region.

Chief Executive's Recommendations in Relation to the City Economy

Economic Development

- Support economic growth within the City, having regard to the National Planning Framework and the Regional Spatial and Economic Strategy.
- Support economic growth and improve Dublin's attractiveness as a place to live, work and invest in, with an emphasis on providing for good quality of life to sustain a growing population.
- Recognise that 'quality of place', 'clean, green, safe', is crucial to the economic success of the city; in attracting FDI, attracting and retaining key scarce talent; tourists, and residents.
- Support the development of the newly launched Dublin-Belfast initiative and the Dublin Belfast Economic Corridor.
- Support a broad-based economy within the City, catering for different skill levels and increasing economic resilience.
- Support local business while continuing to strive to make Dublin as attractive a destination for foreign direct investment as possible.
- Create a suitable balance between the need for a wide range of economic activities to be provided at a local level, while enabling the continued provision of higher order activities in significant employment clusters, and in particular, in the City Centre.
- Ensure that Dublin remains, and becomes more internationally competitive in providing a world-class business environment for new and existing companies

by supporting the continued development of well-serviced office floorspace of varying scale in suitable locations.

- Ensure flexibility to facilitate existing and future trends in economic development and employment, including being supportive of different ways of working whether from home or otherwise.

Education, Skills and Training

- Have regard to the policies and initiatives contained in the current Dublin City Local Economic Community Plan (LECP) and support its delivery.
- Recognise the key role of Third Level College sector in the economic and social success of the city, and to facilitate the expansion of this sector and the provision of the necessary additional facilities.
- Support for the delivery of education, training and skills development.
- Support measures to address economic deprivation in the City.

Tourism

- Support the ongoing efforts and initiatives of the Fáilte Ireland to develop Dublin's tourism sector and support the provision of necessary facilities including visitor attractions to improve the tourism offer.
- Preclude the full-time use of houses or apartments as short-term lets.

Healthcare

- Promote and support the potential of the area adjoining the St. James' Hospital complex as the focus for health-related economic activity.
- Recognise that hospitals and the wider healthcare sector are crucial to the wellbeing of the city including as major sources of employment, economic development and innovation.

Dublin Port

- Support the ongoing development of the Port having regard to wider transport and infrastructural considerations for the Dublin region.

Theme 5: The City, Urban Villages and Retail

Submission Number(s):

S-00331, S-00414, S-00727, S-00258, S-00419, S-00236, S-00106, S-00257, S-00739, S-00741, S-00742, S-00743, S-00066, S-00135, S-00304, S-00329, S-00357, S-00453, S-00065, S-00046, S-00404, S-00737, S-00738, S-00740, S-00744, S-00728, S-00214, S-00688, S-00687, S-00294, S-00668, S-00301, S-00662, S-00656, S-00643, S-00641, S-00644, S-00575, S-00005, S-00007, S-00060, S-00075, S-00082, S-00084, S-00097, S-00101, S-00116, S-00074, S-00090, S-00091, S-00100, S-00112, S-00117, S-00132, S-00141, S-00142, S-00128, S-00129, S-00130, S-00134, S-00139, S-00140, S-00157, S-00178, S-00205, S-00218, S-00226, S-00240, S-00249, S-00250, S-00256, S-00259, S-00264, S-00268, S-00274, S-00290, S-00305, S-00332, S-00334, S-00361, S-00366, S-00374, S-00377, S-00385, S-00415, S-00437, S-00462, S-00473, S-00504, S-00508, S-00522, S-00564, S-00580, S-00582, S-00595, S-00599, S-00605, S-00606, S-00161, S-00164, S-00174, S-00188, S-00189, S-00192, S-00194, S-00195, S-00196, S-00199, S-00202, S-00229, S-00230, S-00233, S-00241, S-00247, S-00254, S-00273, S-00279, S-00287, S-00297, S-00300, S-00313, S-00316, S-00336, S-00346, S-00348, S-00349, S-00387, S-00399, S-00408, S-00441, S-00442, S-00457, S-00458, S-00490, S-00500, S-00542, S-00550, S-00571, S-00574, S-00586, S-00588, S-00592, S-00615, S-00623, S-00245, S-00664, S-00663, S-00652, S-00651, S-00650, S-00447, S-00731, S-00440, S-00626, S-00719, S-00693, S-00709, S-00726, S-00655, S-00649, S-00648, S-00642, S-00657, S-00658, S-00183, S-00203, S-00696, S-00277, S-00694, S-00165, S-00517, S-00350, S-00721, S-00206, S-00187, S-00710, S-00711, S-00523, S-00579, S-00220, S-00604, S-00612, S-00636, S-00720, S-00293, S-00326, S-00610, S-00699, S-00640, S-00748, S-00557, S-00529, S-00733, S-00730, S-00723, S-00716, S-00714, S-00669, S-00665, S-00445, S-00538, S-00162, S-00717, S-00369, S-00680, S-00676, S-00692, S-00113, S-00420, S-00751, S-00108

Summary of Issues

The City Centre

A number of submissions have commented that the future of Dublin City Centre post Covid 19 is dependent on building upon and consolidating the unique experiences that the City Centre offers to the visitor / the city's resident.

Submissions suggested that there needs to be more diversity in the retail sector and that a mix of uses, including retail, cultural, food and beverage, night time economy uses, events, tourism uses and markets, is required to draw people into the City Centre. Some submissions highlighted the major role that retail plays for the city while others commented that physical retailing is becoming obsolete. Many submissions stated that the success of the mix of uses in south inner city (retail / food & beverage and night time uses) needs to be replicated around the city.

The changing role of retail was also acknowledged in some submissions that that the contemporary needs of retailers needs to be considered including requirements for

click and collect and to improve overall accessibility to shops and the core retail area.

Submissions generally sought a reimagining of the City Centre – a place where people go to linger / for leisure and culture purposes and, therefore, outdoor spaces / public spaces need to be improved / extended / animated and parks should be open longer. It is also highlighted by many that the public realm should have a range of civic amenities and safe crossings and be accessible to all. This would make the City Centre more attractive, a safe place and would help to improve the retailing experience. A number of submissions indicated support for the Actions outlined in the Bannon Report on the 'Role & Function of Retail in the City Centre', Dec 2020, including the development of walking trails.

According to some submissions, Covid 19 has exposed the vulnerability of the City Centre and its reliance on uses such as office and hotels. The liveability of the City Centre has been called into question by some. It is suggested in a number of submissions that the City Centre needs its own residential community and that it needs to attract / accommodate families by providing quality urban living and all this entails. Submissions received support the 'Living City's Initiative' but highlighted that it is not successful in getting people to live in the City Centre. Similarly a number of submissions stated that building on the edge of the City has further reduced the attractiveness of the City Centre as a place to live and shop.

Submissions called for protection / provision of local / traditional shops / retention of cafes shops etc. that are unique to the city and that there is a need for more convenience shops. It was also detailed by some that there needs to be more support for local and indigenous retail businesses post Covid 19.

Areas of the City Centre identified as requiring rejuvenation include the O'Connell Street area, Moore Street / Moore Lane and Dame Street. City quarters identified as in need of regeneration include the North East Inner City, Dorset Street and Pearse Street areas and Baggot Street.

Category 1 and Category 2 Streets

A number of submissions highlighted that they agree with the Bannon Report on the 'Role & Function of Retail in the City Centre', Dec 2020 which suggests for a review of Category 1 and Category 2 Streets in the City Centre. Submissions indicated that these current designations in respect of the City Centre's principal retail streets need to be reviewed in order to allow for a greater mix of uses on these streets / to give struggling businesses options. This, it is stated, would help the city recover in a post Covid 19 context and provide more animation on these streets past traditional retail hours. Some submissions stated that while retail is needed on these streets, it should be supported with complementary uses; and that lower order retail uses should be controlled. Non retail uses suggested for these streets include tourism uses such as cultural and heritage uses and food and beverage uses. One submission noted that the current Planning Schemes pertaining to O'Connell Street and Grafton Street would need to be reviewed also.

Urban Villages and the '15 Minute City' Concept

Submissions received sought the protection and strengthening of the character and role of urban villages. A number of submissions were concerned that the character of these villages is being undermined by diminishing / lack of retail provision, lack of traditional village shops, ongoing public transport proposals, vacancy, lack of certain social infrastructure, lack of upkeep / regeneration, dereliction, traffic congestion, inappropriate development etc. Submissions referred to the examples of Donnybrook, Ranelagh, Rathmines, Phibsborough, Ballyfermot, Sandymount, Dolphins Barn, Stoneybatter and Inchicore.

A number of submissions requested that the next Development Plan actively promotes the '15 Minute City' concept / approach for the development of the city / urban villages whereby people's daily requirements can be reached within 15 minutes by foot, bike or public transport.

Some submissions stated that the urban villages need a greater role and that as these centres already form a network of neighbourhoods with a certain level of service provision, they are well placed to grow / develop to cater for all their communities local daily needs / provide easy access to facilities as per the '15 Minute City' approach.

Other submissions highlighted that in order for them to fulfil this role they need further investment / improvements / plans etc., including new public realm improvements, support for local businesses, new cycleways, community facilities, new homes, services and employment, public transport improvements, mixed use development, densification / reuse of derelict – vacant buildings / shops, the realisation of the natural assets of these villages and better links to surrounding areas. A number of submissions highlighted that future development on the edge of the city / outside these communities reduces further the attractiveness of these villages. Concrete examples / policy/ direction for the '15 Minute City' approach are sought. A number of submissions also sought the extension of the 'Living City Initiative' to the wider city area.

Markets

Many submissions on the City Centre and urban villages outlined strong support for existing and new markets, especially public markets. They stated that markets can help regenerate and revitalise the city and urban villages as they add energy and excitement to the city / bring life to the streets and are instrumental in placemaking. Submissions noted that markets are disappearing from the city and need to be protected, enhanced and allocated space. Submissions noted that a variety of markets are needed with different offerings in the City Centre and in key urban villages and it is stated that DCC should support these / assess the feasibility of these. Support is outlined for the Victorian Fruit and Vegetable project at Mary Street which should have a revitalising effect on that area of the City. New Markets are suggested for Smithfield and Broadstone Plaza. There is support in a number of submissions for the regeneration of the Moore Street Market area and also the Iveagh Market.

Pedestrianised Public Realm / Urban Greening

A significant number of submissions on the City Centre, urban villages and retail were focused on the need to improve / expand the pedestrianised public realm to create public plazas, to maximise public footpaths and to provide opportunities for urban greening / seating / and congenial, safe public space. It is outlined in many of the submissions that this would allow for restaurants to have outdoor seating, for more events to be held and for people to have more room for cycling / movement and social interaction, thereby, making these centres more attractive and improving the retail experience. Opportunity areas for urban plaza's / parks / public realm improvements identified were College Green, the Ambassador, Moore Lane, Kildare Street and Molesworth Street and Grattan Bridge. Submissions recognised that Dublin City Council must engage with retailers as part of public realm schemes.

Vacancy

Submissions noted that vacancy in the City Centre / urban villages has the potential to have a negative impact on the city and its streetscapes. It is suggested that planning policy needs to be flexible when dealing with vacant properties and that a range of uses / temporary uses could occupy these spaces. Examples referenced included pop up uses; cultural uses by the creative industry; uses by social entrepreneurs and uses for educational purposes. One submission suggested that the next Development Plan should address specifically the issue of vacancy in flagship units such as Debenhams. Some submissions also noted that there should be greater flexibility regarding subdivision of shop units as well as greater use of upper floors.

Night Time Economy

Many submissions called for the protection and development of a Night Time Economy in the city. Submissions stated that a mixed Night Time economy makes the city more open to all and that a more neighbourhood based approach to Night Time Economy should be investigated.

Car Park / Deliveries

A number of submissions indicated that there is a need to differentiate between commuter parking and shopping parking so that shopping parking is protected. There was strong support in a number of submissions that there should be a reduction in city centre car parking. On the issue of deliveries and kerb side loading, some submissions sought the use of more cargo bikes / electric vans and in some cases, the removal of loading bays. Conversely, other submissions sought no restrictions on deliveries and highlighted the need to retain city centre car parking, particularly for accessibility. For reasons of sustainability, some submissions stated that businesses should set up their own delivery businesses and the current Sustainable Delivery System in the City Centre should be extended City wide. It was also noted that there may be scope to use city centre car parks for a wider variety of uses including e-charging and last mile delivery depots.

Advertising

There were some submissions pertaining to outdoor advertising and suggesting greater flexibility to permit some should be provided in the Development Plan. It was considered that outdoor advertising plays an important role in supporting the retail function of the city.

Chief Executive's Response in Relation to the City, Urban Villages and Retail

City Centre

The Chief Executive recognises the detrimental impact that the Covid 19 crisis has had on the City Centre and in particular on the retail, retail services, food and beverage, leisure, tourism and cultural sectors. A key challenge for Dublin will be revitalising and developing the resilience of the City Centre post Covid. The changing role of retailing in the City Centre is acknowledged. There is a need to understand and accommodate this sector's contemporary needs and to support that sector as an important part of the City's character and commerce in order to maintain the City Centre's retail primacy. It is also recognised that a complementary and multi-faceted mix of City Centre uses, including residential use, is required in a post Covid 19 context, to support and strengthen all City Centre uses and to ensure the attractiveness and resilience of the City Centre as a destination in itself and as a place to live.

The Chief Executive recognises that supporting a mix of City Centre uses will need to be allied to environmental and public realm improvements as well as protecting, and enhancing those aspects of City which give it its character including its historic streets, its civic / green spaces and supporting the retention of uses which are unique to the City. Appropriate policies to support such measures will be included in the Draft Plan.

The next Development Plan should continue to support the work of Dublin's Business Improvement District (BID) - 'WeareDublinTown' / 'DublinTown'.

Category 1 and Category 2 Streets

It is acknowledged that, in light of the Covid 19 crisis, the evolution and acceleration of on-line retailing and shifting consumer habits that a review of Category 1 and Category 2 Shopping streets – the Principal Shopping Streets of the City Centre – and the land use approach to same, is warranted. While any such review would have to have regard to the need to protect a (potentially contracted) City Centre retail core, it could identify opportunities / streets where the development of a mix of uses - cultural, food and beverage and leisure offers would benefit / be complementary to our City's retail sector in terms of visitor draw and reduced potential for vacancy. It is acknowledged that the O'Connell and Grafton Street Special Planning Control Schemes and Architectural Conservation Area designations would also need review.

Urban Villages and the '15 Minute City' Concept

The City's District Centres and urban villages are at the heart of residential communities. They function to serve the needs of the local communities providing a range of commercial and community uses for surrounding communities.

The next Development Plan will identify a hierarchy of urban centres outside of the City Centre in accordance with the hierarchy set out in the RSES. District Centres will form the top tier of centre outside the City Centre. They are capable of providing a high level and comprehensive range of commercial and community facilities to a wide catchment base and are based around high quality rail based public transport /

fulfil a regeneration role. Below this will be those urban villages which provide for the daily shopping needs and local services of a residential community.

The Chief Executive agrees that many of our urban centres fulfil or have the potential to fulfil the '15 Minute City' role. Those elements of the '15 Minute City' concept, such as compact urban and mixed use development, higher urban densities, viable commercial cores with a comprehensive range of high quality community and commercial facilities and high quality urban environments, and high levels of access to quality public transport / the development of sustainable transport modes, will continue to be pursued through the next Draft Development Plan.

There is also potential for the development of more office accommodation (digital hubs / workspace) in District Centres particularly in light of people working from home which is likely to become a longer term trend and appropriate policy in this regard will be considered in the draft plan.

Markets

It is acknowledged that indoor and street based markets add vibrancy and interest to the City as well as supporting local produce/enterprise and, therefore, the development of markets will be supported in the next Development Plan. The proposed redevelopment of the Victorian Wholesale Fruit and Vegetable Market on Mary's Lane and a regenerated Iveagh Market and Moore Street Market, have the potential to provide major visitor attractions in the City as well as a service for residents.

Pedestrianised Public Realm / Urban Greening

The City Council, through its Public Realm Programme, continues to invest in new civic spaces and public realm improvements in the City Centre as part of the ongoing creation of a highly attractive, high quality street environment which is pedestrian friendly and easily navigable. The Public Realm programme is aligned over 3 Development Plans to 2034.

The ongoing implementation of public realm projects and plans such as the City Centre Public Realm Masterplan, 2016, will provide for increased spaces / plazas for pedestrians and improved links between the north and south retail cores as well as the strengthening of key pedestrian routes in areas of high footfall and the animation / greening of the public realm.

The draft Development Plan will need to consider targeting Local Environment Improvement Plans / Town Centre Renewal Plans and Placemaking Strategies to those Urban Villages which are in need of revitalisation.

Vacancy

It is recognised that the next Development Plan will need to promote the temporary use of vacant premises in order to reduce the level of vacancy on streets and in order to minimise the poor appearance of vacancy which can compromise the vitality of urban centres. Temporary uses which can contribute to the economic, social and cultural vitality of centres and which animate the street and allow public access could be encouraged (pending permanent occupancy).

In the case of large vacant retail units consideration is required as to how best these can be repurposed to support city centre vitality while still while maintaining active / retail ground floor uses. This will be addressed further in the forthcoming plan.

Night Time Economy

The Chief Executive recognises the role the night time sector plays / can play in the social and economic life of the City. The next Development Plan will need to set out policies promoting, supporting and encouraging evening / night time economy uses that contribute to the vitality of the City Centre / the City's Urban Centres and which support the creation of a safe, balanced and socially inclusive evening / night time economy. It is recognised that a successful night time economy requires consideration of a number of issues, some of which fall outside the remit of the Development Plan, such as appropriate night time governance, a safe, active, and tolerant public realm, a vibrant mix of residential and cultural uses, together with good public transport for all citizens including night time workers.

Car Parks / Deliveries

It is transport policy in the City Centre to distinguish between parking for the long term commuter (office workers) and short term parking for visitors / shoppers / business. This support of short term parking would be in addition to facilitating sustainable travel modes including walking, cycling and public transport.

To support public realm improvements and pedestrian priority in the retail core of the City Centre, and to support access for all, short term parking for shoppers should be located at the periphery of the retail core. This potential policy approach can be considered as part of the Plan making process.

The Chief Executive recognises that optimising deliveries for businesses, citizens and the environment is vital to the sustainable and low carbon development of the City. New approaches to urban deliveries utilising smart technology and initiatives such as Last Mile Delivery which sees the use of green transport modes such as e-vehicles, e-bikes and cargo bikes for city centre deliveries, are currently being trialled. It is considered appropriate that the Draft Development Plan contain an objective for the preparation of a Servicing / Logistics Strategy for the City Centre which could look at a number of innovative and practical delivery solutions.

Advertising

The use of outdoor advertisements such as billboards and digital advertising in the City's streetscapes and public realm is a feature of urban centres. The current Development Plan's Outdoor Advertising Strategy sets out guidance in respect of the design and siting of outdoor advertisements such that they contribute positively to the appearance and character of the City and such that they do not adversely impact upon amenity and public safety. This Strategy will be examined as part of the Development Plan review process to ascertain if changes are required.

Chief Executive's Recommendations in Relation to the City, Urban Villages and Retail

Central Area

- Continue to seek to maintain the status of the City Centre retail core as the premier shopping area of the State.
- Ensure our urban centres are more adaptive to changing consumer behaviour and are increasingly resilient to changing market dynamics / changes in retail format. Support and facilitate competition and innovation in the retail and other service sectors as per current policies RD12 and RD21.
- Exploit the unique assets of the city in developing and reinforcing the retail profile of the city. Consider evolving trends in retailing, including experiential retail and need to promote a vibrant range of uses in the city.
- Promote retail development as one strand of a multi-faceted approach to include leisure, food and beverage, residential, offices, tourism, and educational development in the City Centre / urban centres. A policy emphasis on increasing the residential base in these centres to support these functions could be considered.
- Continue to seek the provision of convenience shopping within the inner city and support a range of specialist shops / indigenous retail / independent shops as these can and do contribute to the character and attractiveness of the City.
- Seek to acknowledge the role and facilitate the work of 'DublinTown' which includes the provision of additional City Centre services and projects to improve the City Centre.
- In view of changing retailing trends and changes in consumer trends / behaviours, the role of Category 1 and Category 2 Streets in the Retail Core of the City Centre requires review for the Draft Development Plan. This will require a corresponding review of the Schemes of Special Planning Control and the Architectural Conservation Area pertaining to these streets.
- Promote and encourage 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.
- Promote the temporary use of vacant premises and the repurposing of large vacant retail units. Temporary uses which can contribute to the economic, social and cultural vitality of centres and which allow public access could be encouraged.

District Centres/Urban Villages

- Continue to encourage and facilitate the mixed use / intensification of development / increased densities / compact growth emphasis of the current

Development Plan in respect of District Centres/Urban Villages with an emphasis on community and social infrastructure and with a view to consolidating and adding vitality to these centres including through the provision of residential development in line with the principle of the 15 minute city.

- Consider the potential for the development of digital hubs / workspaces in District Centres, particularly in light of people working from home which is likely to become a longer term trend.

Markets/Public Realm

- As per Policy RD7 and Policy RD24 of the current plan, facilitate indoor and outdoor markets in the City and promote the clustering of complementary uses; and, promote and facilitate the implementation of the City Markets Project on Mary's Lane and the regeneration of the Iveagh Markets and Moore Street Market.
- As per existing Policy RD22, support the implementation of the Council's Public Realm Strategies to enable the provision of increased pedestrian space; the increased greening of the City Centre; improvements to the retail environment and linkages between the Grafton Street and O'Connell Street Shopping areas. Provide specific support for public realm projects such as the College Green Plaza project.
- Promote the development of public realm / greening strategies for our urban centres and investment in the urban environment in order to achieve a network of active, attractive and safe streets and public spaces with a high quality public realm which allows ease of movement for the pedestrian, which are inviting and which include, as appropriate, seating.

Parking and Servicing

- Safeguard short term parking provision for shoppers / visitors / business at the periphery of the retail core to ensure continued access for all to the City Centre while supporting public realm improvements and pedestrian priority in the retail core.
- Include an objective to develop a servicing strategy for the city which will include consideration of last mile deliveries and use of e-fleets.

Theme 6: Sustainable Movement and Transport

Submission Number(s):

S-00424, S-00331, S-00108, S-00633, S-00414, S-00524, S-00727, S-00154,
S-00496, S-00099, S-00401, S-00071, S-00239, S-00068, S-00106, S-00257,
S-00129, S-00697, S-00705, S-00066, S-00107, S-00131, S-00135, S-00147,
S-00150, S-00211, S-00382, S-00304, S-00354, S-00359, S-00417, S-00247,
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S-00685, S-00151, S-00153, S-00157, S-00161, S-00169, S-00194, S-00203,
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S-00268, S-00278, S-00279, S-00283, S-00292, S-00299, S-00305, S-00306,
S-00314, S-00321, S-00332, S-00336, S-00348, S-00351, S-00375, S-00381,
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S-00173, S-00137, S-00210, S-00183, S-00277, S-00667, S-00352, S-00694,
S-00165, S-00628, S-00710, S-00711, S-00284, S-00523, S-00579, S-00220,
S-00636, S-00327, S-00568, S-00293, S-00344, S-00444, S-00136, S-00377,
S-00437, S-00580, S-00610, S-00698, S-00699, S-00639, S-00518, S-00578,
S-00479, S-00560, S-00748, S-00134, S-00529, S-00733, S-00730, S-00723,
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S-00162, S-00717, S-00308, S-00082, S-00718, S-00676, S-00113, S-00297,
S-00167, S-00391, S-00464, S-00420, S-00742, S-00743, S-00607, S-00466,
S-00746, S-00397, S-00751, S-00473, S-00683

Summary of Issues

Walking and Cycling

A number of submissions identified a need to improve the pedestrian environment and to provide more pedestrian zones which are safe and uncongested. It is noted by many that conflict can arise on occasions between pedestrians and cyclists/scooter users as both cyclists and e-scooter users are increasingly using footpaths. Submissions highlighted that there are also a number of locations where there is insufficient space for pedestrians to wait while crossing the street at junctions and noted a desire to increase crossing times at junctions in order to allow through movement for pedestrians and cyclists.

A range of initiatives are suggested in various submissions to improve the environment for cyclists, including more cycle parking, and improved as well as segregated cycle lanes. A range of new cycle routes are also suggested including more contra-flow cycle lanes enabling more direct cycling routes between origin and destination. There is expressed desire in many submissions for the dublinbikes scheme to be expanded, with a number of submissions recommending specific areas for the expansion.

A large number of submissions requested the provision of public bicycle parking in secure areas, either within multi storey car parks such as the facility at Drury Street Car Park or in secure bicycle lockers.

Some submissions stated that parking should not be permitted in cycle lanes and greater enforcement regarding illegal parking on cycle lanes and on footpaths is required.

Support for the concept of the '15 Minute City' and for Low Traffic Neighbourhoods was also expressed in submissions received, with the need for accessible walking and cycling routes and low vehicular movements highlighted in order to facilitate convenient and safe access to services and amenities.

A number of submissions detailed the need for a range of cycling needs to be considered in relation to bicycle parking provision i.e. adapted bikes, cargo bikes etc. as these types of bicycles cannot be easily accommodated within the standard bicycle parking stands used. The need for private developments to also cater for a wide range of different bicycles was also raised.

Specific design considerations for greenways, cycle ways and parks were also raised in relation to the removal of kissing gates and bollards as these can act as an impediment to areas that cannot be used by people on non-standard bicycles or using wheelchairs or buggies.

The need for the development of public realm and greening areas within the City and in neighbourhoods to provide pleasant areas for people to walk and cycle in was also raised.

Micro Mobility

A large number of submissions were received in relation to micro mobility, recognising the increased popularity of e-scooters as a mode of travel around the City. Submissions referenced the importance of introducing regulations and enforcement around the use of e-scooters in the City, in particular, where their use conflicts with pedestrian and cyclists on the existing road and footpath network.

A number of submissions were received from micro mobility providers, outlining the importance of e-scooters as a means of travelling through the City, as well as recognising the role of micro-mobility in the 'last mile delivery' for various goods and services. These private sector providers welcomed the recognition in the Pre-Draft Issues Paper for the City Development Plan of micro mobility and its inclusion as part of an overall approach to multi modal transport options for the City.

Electric Vehicles (EV's)

A number of submissions supported the increased provision of electric charging facilities in publicly accessible areas. The recognition of incorporating such facilities into shared mobility hubs where a range of modes can be supported was also raised. The roll out of electric public transport vehicles was also noted and supported in submissions, allowing vehicles to be carbon neutral and adhering to high environmental standards. The Electricity Supply Board in their submission also referenced their continued roll-out of electrical vehicle charging points in high power charging hubs, as well as detailing support for policy regarding the provision and future proofing of car parking spaces within residential and non-residential developments.

Car Parking

A number of submissions supported the prioritisation of the provision of walking and cycling infrastructure over the private car within the City. A number of submissions outline ideas of how on-street car parking spaces around the City could be reallocated to provide increased walking and cycling infrastructure in certain areas within the City Centre. The reduction in car parking provision in areas well served by public transport was also raised. A number of car park operators also made submissions outlining their need to ensure that access to the car parks was maintained, whilst also detailing their proposals to utilise multi storey car park spaces as multi modal hubs where last mile delivery can take place as well as public cycle parking provision and e-charging facilities.

A number of submissions raised suggestions around the future use of multi-storey car parks and how they could be considered for alternative uses if the role of the private car in the City was to be reduced, such as conversion to residential use, farmers markets etc. Submissions also raised concerns around the large areas of unregulated on-street car parking spaces in areas outside of the City Core and noted that these areas should be provided with an enforced Pay and Display/Permit system or should be removed entirely if the vision of future of a car free City was to be successful.

The use of car sharing initiatives (car clubs) was also raised in submissions and support given for their continued use and roll out across the City and also within private developments.

On the issue of deliveries and kerb side loading, some submissions sought the use of more cargo bikes / electric vans and in some cases, the removal of loading bays. Conversely, other submissions sought no restrictions on deliveries and highlighted the need to retain city centre car parking, particularly for accessibility. For reasons of sustainability, some submissions stated that businesses should set up their own delivery businesses and the current Sustainable Delivery System in the City Centre should be extended City wide.

Public Transport

A number of submissions support the continued investment in public transport infrastructure and encourage the swift delivery of major projects such as Metrolink and DART expansion. Specific operational issues around public transport i.e. the cost of public transport, the need for integrated ticketing, and greater use of technology were also raised. The provision of Park and Ride facilities to encourage people to use public transport was also noted.

Bus Connects

A number of submissions raised issues surrounding the impact of Bus Connects on local neighbourhoods, in particular around the potential loss of existing trees in certain areas due to the infrastructure proposed or with regards the removal of on street parking.

Metrolink

A number of submissions outlined support for the extension of the proposed Metrolink to areas such as Rathfarnham/Terenure/Knocklyon (referred to as Metro South West in the submissions).

Roads and Traffic Management Issues

A number of submissions raised specific localised traffic management issues in relation to changes to existing road networks in areas such as North Circular Road, Drimnagh, Crumlin, Dorset Street/Synott Place, Ranelagh and Dublin 8 as a means to address ongoing traffic and congestion issues. Issues relating to prioritisation of pedestrian and cyclists at traffic light junctions, allowing for longer call times at junctions were also noted. The need for greater enforcement around a number of areas such as illegal car parking, in particular on public footpaths or in cycle lanes, were raised.

The introduction of a congestion charge for the City was also noted in a number of submissions as a means to help alleviate the increase in private car usage within the City. A number of submissions also supported the roll-out of the 30kph zones in various locations throughout the City.

Support was also given in a number of submissions to the provision of school zones and other traffic calming measures near schools, many of which were implemented during the pandemic and that their continued roll-out should be promoted across the City.

Some submissions received note that the Plan should provide clarity regarding the location and alignment of the Eastern Bypass Corridor and the Southern Port Access Route (SPAR). The Electricity Supply Board (ESB) note in their submission land use conflicts on the Poolbeg Peninsula between proposed ESB development (battery storage unit / gas peaking plant / gas station) at its Ringsend plant and the proposed reservation associated with the route of the Eastern Bypass Corridor.

Chief Executive's Response in Relation to Sustainable Movement and Transport

Walking and Cycling

The policy approach within the City over the last two decades has been to integrate land use and transportation and to encourage a shift from private car use to walking, cycling and public transport. Policy has increasingly focused on the health and social benefits of active travel and the role that high quality public realm plays in encouraging walking and cycling. Proactive engagement with communities, schools, businesses and other stakeholders to collaboratively bring about behavioural change has been a more recent policy focus. It is proposed that the Draft Plan will continue to build on this approach, whilst being cognisant of changes in mobility including the increasing role of shared mobility, micro mobility, electric vehicles and the application of technology in the mobility sector.

The Draft Plan will continue to support the reduction in car use and promotion of active travel and improved environments for same to encourage a modal shift to more sustainable modes of transport. Opportunities for increased pedestrianisation of the City Core will be supported in the Draft Plan. Policies supporting the provision of high quality public realm will also be included.

The NTA's GDA Cycle Network Plan is currently being reviewed and will address the provision of a continuous network across the 4 local authorities. The draft City Development Plan will recommend policies supporting the expansion of public bike share schemes including e-bikes. Decisions on the expansion of existing schemes including licensed schemes is outside of the scope of the Development Plan. The Draft Plan will include policies supporting the expansion of the cycle network and supporting the provision of high density cycle parking, as well as parking for cargo and adapted bikes.

The Draft Plan will also recommend policies to promote a collaborative approach to the provision of new infrastructure through residential areas/neighbourhoods when preparing active mobility plans for such areas.

Micro Mobility

The engagement and support given from the submissions on a number of the issues raised is welcomed, in particular where recommendations and reference to external guidance was offered, demonstrating best practice and exemplar ideas around emerging policy areas such as shared and micro mobility as well as electric vehicle technology.

Micro mobility was identified as a key issue in the pre-draft Issues Paper and new policy around this emerging area will be included in the Draft Plan. The role of micro

mobility in meeting the city's mobility needs has come to the fore recently not least during the Covid 19 pandemic. Debate around the use of micro mobility has generally centred on safety and regulation. With appropriate regulation in place regarding quality, insurance, maximum speed etc., micro mobility is seen as an important mobility solution for the city. Shared scooter schemes have proven very successful in other international cities and the similar provision in Dublin City will be considered.

Policies supporting micro-mobility and shared micro-mobility schemes and the development of mobility hubs will be recommended in the Draft Plan. Electric mobility, including the charging requirements for same will also be addressed in the Draft Plan.

Electric Vehicles (EV's)

While a shift away from private car use is a key aim, the roll out of electric powered vehicles will continue to be supported in the Draft City Development Plan, particularly with regard to shared cars and fleet vehicles.

A Regional Strategy for electric vehicle charging has been prepared for the four Dublin Local Authorities which addresses a range and type of charging facilities depending on location and associated use. The Draft City Development Plan will include policies on E-charging including for residential developments and the potential to offer this within the public realm to support the growth of EV's at the rate envisaged in the Government's Climate Action Plan (2019).

Car Parking

The implementation of strong car parking policies in the City have been instrumental in changing travel behaviour. In particular, the restriction of car parking provision at destination has succeeded in bringing about substantial mode shift away from private car use. The important contribution that car parking policy can make to sustainable development and sustainable living is recognised.

Changes in car parking standards within the City Core will be reviewed for both residential and commercial developments as well as consideration to the role of on-street parking in outer areas of the City, in particular, where no management scheme is currently in place.

The Draft Plan will also include policies supporting the expansion of car share schemes including e-cars. The expansion of existing schemes including licensed schemes is an operational matter. Policies regarding alternative uses for multi storey car parks will be considered, as well opportunities for the last mile deliveries and high density cycle parking.

The reallocation of on-street car parking for public realm or active mobility will be considered on a case by case basis having regard to the overall functional needs of the street, providing for loading and for disability parking opportunities.

Public Transport/ Bus Connects/ Metrolink

Public transport is crucial for the City and the region as it has the greatest potential to move the highest volume of people. The delivery of public transport infrastructure

in co-operation with the relevant transport agencies continues to be of utmost importance.

While the expansion and development of the overall public transport network is a matter for NTA Transport Strategy, there will be continuing work with the transport agencies in the delivery and improvement of public transport infrastructure and services across the City.

Any forthcoming guidance from the Department of Transport, Tourism and Sport (DTTAS) will be referred to in the Draft Plan.

Objections to Bus Connects and Metrolink projects are not a matter for the Development Plan, as the delivery of these projects is through a separate statutory process with An Bord Pleanála, to which the public can directly engage with. However, in principle, the Draft Plan will include policy to support the NTA, TII and other agencies in the provision of public transport infrastructure including LUAS, Metrolink and Bus Connects.

Roads and Traffic Management Issues

The NTA Transport Strategy for the Greater Dublin Area commits to undertake a number of new projects, many of which will greatly benefit the City. This includes the development of a road link connecting from the southern end of the Dublin Port Tunnel to the South Port area, which will serve the South Port and adjoining development areas. The provision of this road infrastructure is also identified in the National Planning Framework as a key growth enabler for Dublin Port to assist in its growth with greater efficiency and improved road access. There will be further liaison with the NTA, TII and other transport agencies with regards the location of and delivery of key road infrastructure projects, including the South Port Access Route (SPAR) and the proposed Eastern By Pass Corridor.

It is noted that many submissions outline specific traffic management and operational issues in localised areas throughout the City. Local changes in traffic management, parking charges and enforcement of traffic laws are not a matter for the Development Plan; however, policy reflecting the reduction in car use and promotion of active travel and improved environments for same at an area/neighbourhood level will be considered in the Draft Development Plan. The Draft Plan will include policy to develop a servicing strategy for the City which will include consideration of last mile deliveries and use of e-fleets.

Other Issues

It is noted that a number of area specific references have been made relating to traffic management, congestion and parking enforcement issues. These are operational functions of the Council and, therefore, are not a matter for the Development Plan. The principle of the issues arising in these areas will be reviewed at a strategic level to ensure that the relevant policies and objectives are in place in the Draft Development Plan.

Chief Executive's Recommendations in Relation to Sustainable Movement and Transport

Integrated Land Use Planning

- Concentrate compact growth around existing and planned services ensuring that transport and land use are integrated to the greatest extent possible so that the demand for travel in general and for car-based travel is reduced.
- Work with the National Transport Authority, Transport Infrastructure Ireland, and other transport agencies in developing an integrated set of transport objectives for Dublin City and connections into surrounding counties in line with the GDA Transport Strategy and national and regional policy, encouraging modal shift towards more sustainable modes of transport and patterns of commuting.

Public Transport/national Routes

- Promote the delivery and improvement of public transport infrastructure and services across the City including BusConnects, rail and LUAS in terms of connections, capacity, and efficiency of services in line with national and regional policy.
- Work with Iarnród Éireann, the NTA, TII and other operators, progressing a coordinated approach to the improvement of the rail network, integrated with other planned public transport modes to ensure maximum public benefit, and promoting sustainable transport options, and improved connectivity.
- Consider and evaluate the land-use planning implications of planned strategic road routes, including the proposed Eastern By-Pass road route alignment, having regard to changed development contexts and any local level plans.

Sustainable Transport

- Secure the development of a high quality, fully connected and inclusive walking and cycling network across the City, including the upgrade of the existing network and support the integration of walking, cycling and physical activity with place-making including public realm improvements. Routes within the network will be planned in conjunction with Green Infrastructure objectives and on foot of (*inter alia*) the NTAs Cycle Network Plan and the National Cycle manual.
- Include sustainable transport indicators, including targets for mode share, to monitor the policies and objectives of the plan over its lifetime.
- Promote and help develop community-based co-ordinated initiatives at local level that encourage active travel and modal switch to sustainable transport modes.

- Incorporate requirements for Active Travel Plans and Traffic Management Plans where appropriate through the Development Management System.
- Seek a reduction in City Centre motorised 'through traffic', through a package of measures aimed at improving public transport access and circulation, and by encouraging use of more sustainable travel modes. These measures would include, *inter alia*, traffic management measures, modifications to road layouts, and enhancements to public realm.

Parking/DMURS

- Support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.
- Review the standards and the car parking requirements for residential and non-residential development in line with national planning and transport policy requirements.
- Regulate and control on-street parking by discouraging commuter parking and to manage car parking as part of the overall strategic transport needs of the City.
- Seek to implement the provision of the Design Manual for Urban Roads and Streets (as updated) in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability.

EV Charging

- Support the forthcoming 'Dublin Regional EV Charging Strategy' and the growth of Electric Vehicle use as an alternative to the use of fossil-fuel burning vehicles, through a roll-out of additional charging points at appropriate locations.
- Review Development Management policies in relation to the delivery of sustainable transport infrastructure in particular EV charging to support the use of cleaner fuel.

Dublin Port

- In supporting the role of Dublin Port as an economic driver and gateway to the City and country, to examine the implications of its future growth for land-use and transport planning in the vicinity.

Theme 7: Green Infrastructure, Open Space, Recreation and Natural Heritage

Submission Number(s):

S-00568, S-00424, S-00331, S-00108, S-00101, S-00112, S-00414, S-00727, S-00126, S-00258, S-00496, S-00099, S-00207, S-00231, S-00238, S-00066, S-00279, S-00107, S-00131, S-00135, S-00147, S-00150, S-00211, S-00382, S-00329, S-00357, S-00417, S-00455, S-00205, S-00208, S-00070, S-00539, S-00480, S-00036, S-00044, S-00629, S-00567, S-00559, S-00469, S-00519, S-00552, S-00728, S-00080, S-00688, S-00668, S-00656, S-00641, S-00520, S-00004, S-00020, S-00023, S-00026, S-00027, S-00047, S-00048, S-00054, S-00059, S-00123, S-00003, S-00018, S-00053, S-00058, S-00063, S-00068, S-00069, S-00079, S-00091, S-00092, S-00121, S-00122, S-00139, S-00146, S-00129, S-00130, S-00133, S-00141, S-00149, S-00153, S-00158, S-00179, S-00184, S-00194, S-00199, S-00204, S-00215, S-00223, S-00233, S-00236, S-00237, S-00240, S-00248, S-00253, S-00256, S-00259, S-00261, S-00262, S-00264, S-00268, S-00269, S-00273, S-00291, S-00296, S-00298, S-00299, S-00305, S-00306, S-00319, S-00332, S-00334, S-00345, S-00346, S-00348, S-00360, S-00361, S-00363, S-00366, S-00377, S-00379, S-00385, S-00399, S-00408, S-00410, S-00431, S-00468, S-00472, S-00475, S-00488, S-00490, S-00491, S-00493, S-00495, S-00508, S-00509, S-00516, S-00522, S-00531, S-00551, S-00554, S-00562, S-00582, S-00595, S-00603, S-00605, S-00608, S-00614, S-00615, S-00626, S-00056, S-00078, S-00045, S-00148, S-00151, S-00155, S-00160, S-00161, S-00165, S-00174, S-00175, S-00190, S-00192, S-00195, S-00196, S-00200, S-00202, S-00218, S-00224, S-00226, S-00229, S-00232, S-00243, S-00250, S-00254, S-00267, S-00278, S-00283, S-00290, S-00292, S-00302, S-00308, S-00313, S-00336, S-00340, S-00351, S-00398, S-00419, S-00420, S-00429, S-00439, S-00443, S-00450, S-00462, S-00471, S-00492, S-00506, S-00525, S-00540, S-00542, S-00550, S-00571, S-00575, S-00586, S-00593, S-00606, S-00621, S-00245, S-00624, S-00666, S-00664, S-00663, S-00577, S-00651, S-00650, S-00645, S-00407, S-00152, S-00447, S-00637, S-00731, S-00729, S-00440, S-00722, S-00719, S-00693, S-00709, S-00726, S-00057, S-00620, S-00333, S-00657, S-00658, S-00210, S-00183, S-00203, S-00696, S-00277, S-00667, S-00388, S-00694, S-00428, S-00517, S-00677, S-00206, S-00710, S-00284, S-00523, S-00220, S-00612, S-00636, S-00327, S-00293, S-00326, S-00344, S-00395, S-00444, S-00136, S-00437, S-00442, S-00616, S-00589, S-00580, S-00592, S-00394, S-00610, S-00518, S-00578, S-00479, S-00560, S-00748, S-00730, S-00716, S-00674, S-00673, S-00669, S-00635, S-00433, S-00538, S-00162, S-00280, S-00717, S-00312, S-00303, S-00082, S-00718, S-00270, S-00676, S-00692, S-00297, S-00167, S-00512, S-00607, S-00743, S-00169, S-00746, S-00466, S-00397, S-00751, S-00473, S-00752

Summary of Issues

Biodiversity

Submissions sought the protection, promotion and enhancement of biodiversity in the City and that the plan should include local biodiversity areas to protect areas of natural heritage value which are currently undesignated. A key tenet was that future

developments should create a net gain and not a loss of biodiversity. Many submissions highlighted the need for more engagement and education for citizens to connect with biodiversity in their local area and that there is a need for more native trees, planting, pollinator gardens and wildflower areas that encourage biodiversity. Submissions also noted that there needs to be a balance between sporting and recreational uses and the protection and enhancement of natural assets. A number of submissions highlighted the importance of the Dublin Bay Biosphere and that designated sites need to be preserved, protected and enhanced.

Green Infrastructure

The importance of green infrastructure is highlighted in numerous submissions and that the plan must support the delivery of a wide range of ecosystem services in our urban settings including the creation of biodiversity corridors. Submissions also detailed that the provision of green infrastructure needs to be protected and promoted and that there needs to be a greater emphasis on green infrastructure in areas with a deficit of such facilities.

Parks

The need for more parks and green spaces across the City is detailed in many submissions and also that existing parks, green spaces and open spaces should be protected and enhanced. In particular, submissions sought the installation of more pocket parks and micro parks similar to the Peace Park in the inner city. Submissions also sought the provision of more facilities in the City's parks such as tea rooms, toilets, drinking water fountains, recycling waste management, outdoor gym equipment, benches, playgrounds, skate parks, sports facilities, dog parks and in general, facilities for all ages and abilities. Many submissions also requested an increase of walkways and cycle ways in parks to ensure they are accessible to all and that vehicular access/through roads in parks should be removed.

Greening of the City

The importance of promoting measures to enhance the greening of the City is detailed in many submissions. Measures suggested include more greening of the public realm and general streetscape including trees, plants, hedges, wildflowers, hanging baskets and living walls. Submissions also suggested that the next Plan builds upon existing greening initiatives and strategies and promotes more community led involvement and initiatives.

Community Gardens/Allotments

Many submissions highlighted the demand for more community gardens including roof gardens and allotments in the City, where people can interact with nature and implement rewilding projects and planting at a local level whilst also providing a space to bring communities together. It is detailed that available spaces should be used to set up community gardens similar to Mud Island and the new garden planned as part of Bridgefoot Street Park.

Sports Grounds, Pitches and all Weather Facilities

Submissions outlined that the provision of playing pitches and all weather facilities should be increased in the City to meet the growing demand across all sporting activities. It is noted in many submissions that existing playing pitches and sporting facilities should be protected and also that existing pitches should be made

multifunctional so that a range of clubs and sporting activities can benefit from the facilities throughout the day/week. It is highlighted by many that there should be more recognition of the important role sports clubs play within their communities and the need to have these facilities located within or close to residential areas. Submissions called for more provision of outdoor facilities to suit a range of activities across all sports that are field/pitch, court/hard surfaced and water based.

Submissions supported the development of more greenways, in particular, along the rivers and canals, providing a means of sustainable and active travel. Submissions noted that this would also give people access to nature and outdoor recreation and provide connectivity between existing parks and green/blue spaces. It is detailed also that greenways need to be accessible to all.

Water Based Recreation

Submissions sought more provision in the City for swimming and water based activities. Suggestions included the development of an outdoor swimming pool in the City Centre, more changing facilities at the beaches and swimming facilities at the Liffey. It is also suggested that riverside amenities should be promoted including the provision of space along the rivers and canals for cafes, restaurants, walkways, cycle ways, recreational activity and water sports. Submissions sought that more is done to clean up the rivers, canals and coast.

Public Amenities and Facilities

Submissions sought more seating in public spaces including the streets, squares, open space and parks. Many submissions called for more toilets (including facilities for baby changing and disabled persons), drinking fountains, water fountains and bins including options for recycling.

Many submissions also noted that large scale and high density developments should be required to provide more quality amenity space for the residents including playgrounds and facilities for adults and that the option to make a contribution in lieu of public open space should not be permitted.

Recreation and Activity / Health and Wellbeing

Submissions raised the importance of health and wellbeing for people of all ages and abilities and the critical role that our parks and open spaces play in making the City greener and healthier for all of its citizens. The need to protect and create more green and blue spaces is noted as vital in encouraging healthy lifestyles and promoting the health benefits of physical activity, sporting participation and social interaction for our citizens and communities.

Chief Executive's Response in Relation to Green Infrastructure, Open Space, Recreation and Natural Heritage

Biodiversity

The importance of the City's natural assets to the citizens of Dublin is a central consideration in many submissions. Our natural assets provide a platform for community and social interaction, protection of wildlife and natural habitats and the provision of spaces for recreation and physical activity. Protecting and enhancing our City's green spaces, parks, waterways, biodiversity and recreational amenities and

facilities in turn creates and promotes a thriving, healthy and liveable city. The need to continue improving and protecting these valuable assets in the plan for the benefit of both the citizens of the City and the wider natural environment is recognised. This will be a core policy consideration in the Draft Plan.

In particular, the protection, promotion and enhancement of biodiversity (including flora and fauna) in Dublin City is fundamental to achieving a healthy environment and a sustainable future for both our citizens and the wider natural environment. The forthcoming plan will continue to recognise the value and role of the conservation and restoration of biodiversity and ecosystems in our City's natural environment and as a key measure to address climate change.

Many submissions outlined the various benefits that certain activities can make on the natural environment including planting more trees and wildflowers, rewilding and making provision for pollinator gardens. Policies to support the provision for these approaches will be made in the Draft Plan. The Dublin City Biodiversity Action Plan 2015 – 2020 (currently being updated) sets out Dublin City Council's strategy for the conservation of the City's biodiversity. This includes not only management, protection and identification of important conservation areas including Dublin Bay Biosphere but also raising awareness and strengthening the knowledge of the City's citizens. The objectives of this plan will be supported in the Development Plan. Conservation and protection of sites and species under EU Directives and national legislation remain a priority and will be identified in the plan.

Green Infrastructure

The Draft Plan provides the opportunity to further recognise and promote the value of ecosystem services in the delivery of green infrastructure. The Dublin City Climate Change Action Plan 2019-2024 identifies nature based solutions as one of five key action areas for Dublin City Council to address. The multifunctional benefits of a green infrastructure network within an urban settling are undisputed and stretch beyond a biodiversity related value and function. A wide range of benefits are delivered to the citizens including the integration of walking, cycling and recreation, flood prevention, filtration of pollutants, erosion prevention and Co2 storage. The City's existing green infrastructure is well defined within the current Plan as a network of core areas (Dublin Bay, the River Liffey and flagship parks), hubs (parks and open spaces) and corridors (rivers and canals), which are not only connected to each other but also to green infrastructure networks stretching out beyond the City boundary. Policy and support for this green infrastructure network and the multifunctional benefits that such a network generates will be set out in the Draft Plan.

The RSES sets out guiding principles for the preparation of green infrastructure strategies and these principles will be central to the conservation, enhancement and augmentation of the City's green infrastructure in the Draft Plan in the form of new green infrastructure guidelines which can strengthen the capacity of the existing green infrastructure network whilst also facilitating an interdisciplinary approach to green infrastructure. Augmenting the green infrastructure network is also key and it is envisaged that this will be delivered through further identification of additional spaces as part of future local statutory plans or schemes and as part of the development of Strategic Development Zones and Strategic Development

Regeneration Areas in the plan. The role that green infrastructure plays in our City will continue to be integral in making significant contributions in both climate action and environmental risk management and this will be acknowledged in the Draft Plan.

Parks

The provision and protection of the City's parks and open spaces is central to meeting the recreational, sporting, social, cultural and conservation needs of the City. Dublin City Council's Parks Strategy 2019 – 2022 takes into consideration the accessibility, quality, quantity and distribution of parks and facilities within the City. The range of amenities and facilities within the City's parks is wide ranging and includes sports pitches, playgrounds, tea rooms, outdoor gyms and natural amenities. In addition to formal parks, the City's greenways, public realm spaces, streetscapes, cemeteries and residential developments also provide open space in the City. The City's parks provide a key service to the community whether that is informal recreation such as walking or more formal activities such as organised sports. The Dublin City Parks Strategy also outlines the sports and recreational facilities provided on Council lands. The Parks Strategy will be supported in the forthcoming plan.

It is recognised that the location and size of open space around the City is not consistent and deficits have been identified in respect of the provision of flagship parks and open space provision in certain communities across a number of areas particularly the City Centre between the canals. The Draft Plan will build upon the policies and objectives in the current Plan to protect and improve existing parks and open spaces and continue with the existing programme to develop new green and open spaces in the appropriate areas as the opportunity arises in conjunction with protecting the natural environment. The increasing demand for playing pitches and all weather facilities for all sporting activities is acknowledged and will be further addressed in the Draft Plan.

Greening of the City

Opportunities for greening the City and enhancing biodiversity will continue to be identified and supported in the forthcoming plan with widespread recognition of the benefits such measures bring to the communities of Dublin. The Dublin City Tree Strategy 2016 – 2020 (currently being updated) sets out a vision for the management of public trees and will be supported in policy terms. Community gardens, allotments and food and plant cultivation initiatives that encourage more interaction with nature and bring communities together will be further supported in the Draft Plan.

Greenways

The development of greenways provides a means of sustainable and active travel whilst providing ecological benefits and access for citizens to the natural environment. The Draft Plan will promote and support the development of local and accessible greenways and other cycling and walking infrastructure that protect and enhance natural habitats and has regard to environmental sensitivities.

Water Based Recreation

Many submissions sought enhanced provision in the City and along the coastline for swimming, water based activities and associated facilities. The Draft Plan will support and promote appropriate water related amenities and facilities.

Under the Water Framework Directive (2000), the River Basin Management Plan (2018 – 2021) identifies pressure on water quality and sets out a programme of measures and actions to improve water quality in our rivers, lakes, estuaries and coastal waters. There will be continued support for initiatives to improve water quality and to achieve 'good' ecological status.

Public Amenities and Facilities

Submissions sought additional facilities and amenities in public spaces and this will be further considered in the Draft Plan. Consideration will also be given to policy approaches with regard to open space within future developments to ensure a high standard of residential amenity.

Recreation and Activity / Health and Wellbeing

The continual need to protect, create and enhance more green and blue spaces in order to achieve a more liveable city that promotes healthy lifestyles and make the City greener and healthier for all is recognised. The improved health and wellbeing of the citizens of Dublin through recreation and activity will be promoted with greater policy support in the Draft Plan.

Chief Executive's Recommendations in Relation to Green Infrastructure, Open Space, Recreation and Natural Heritage

Biodiversity

- Protect and enhance ecological diversity and the natural environment of both designated sites and undesignated areas.
- Support the protection and promotion of the Dublin Bay Biosphere.
- Continue to support the Dublin City Biodiversity Plan, the Dublin City Invasive Species Action Plan and any future updated versions of these plans.
- Promote rewilding, pollinator gardens and wildflowers in the City.
- Promote biodiversity gain in new developments.
- Promote the value of ecosystem services in the delivery of green infrastructure.

Green/Blue Infrastructure

- Promote the multifunctional benefits of green infrastructure and recognise nature based solutions as a means of mitigating against climate change.
- Support the preparation of a Green Infrastructure Strategy for the City.

- Support the development of interconnected ecological corridors in the City.
- Apply principles of Green Infrastructure development to inform the development management process in terms of design and layout of new residential areas, business/industrial development and other significant projects.
- Examine the potential to co-ordinate between open space, biodiversity and flood management.
- Recognise and promote the diverse and key roles that parks and open spaces have for sustainable communities and healthy placemaking.
- Continue to support the Approved Dublin City Parks Strategy and future versions of the Strategy.
- Continue to support the Approved Dublin City Tree Strategy and future versions of the Strategy.
- Provide for appropriate protection of trees and hedgerows, where possible, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.
- Provide policy support for community gardens, allotments and food and plant cultivation initiatives.
- Support the continuing development of greenways in the City as a means of building upon active and sustainable travel and conserving the natural environment.
- Promote recreational amenities, biodiversity and facilities adjacent to the City's waterways.
- Support water based recreation in the City.
- Continue to support initiatives to improve water quality in the City's waterways and to achieve 'good' ecological status.
- Support the improvement of existing public amenities and facilities in the City.

Play and Recreation

- Continue to support the Approved Dublin City Play Strategy Play Plan and the Dublin City Sport and Wellbeing Strategy and future versions of these strategies.
- Support sports, recreational and play amenities in the City for all ages and abilities.
- Promote the provision of children's play areas and facilities for all ages in new schemes in accordance with up to date statutory guidelines.

Theme 8: Built Heritage and Archaeology

Submission Number(s):

S-00424, S-00331, S-00108, S-00101, S-00112, S-00414, S-00727, S-00048, S-00093, S-00131, S-00135, S-00211, S-00329, S-00247, S-00030, S-00413, S-00629, S-00559, S-00519, S-00728, S-00662, S-00073, S-00079, S-00085, S-00114, S-00119, S-00045, S-00062, S-00130, S-00139, S-00156, S-00160, S-00174, S-00192, S-00196, S-00205, S-00217, S-00218, S-00226, S-00268, S-00283, S-00290, S-00304, S-00307, S-00308, S-00322, S-00332, S-00336, S-00361, S-00366, S-00396, S-00443, S-00487, S-00496, S-00508, S-00533, S-00536, S-00550, S-00580, S-00582, S-00585, S-00595, S-00606, S-00608, S-00615, S-00009, S-00148, S-00161, S-00163, S-00199, S-00206, S-00233, S-00258, S-00264, S-00273, S-00285, S-00334, S-00351, S-00372, S-00379, S-00385, S-00399, S-00408, S-00421, S-00431, S-00477, S-00478, S-00480, S-00484, S-00522, S-00528, S-00548, S-00562, S-00565, S-00586, S-00605, S-00245, S-00666, S-00664, S-00652, S-00651, S-00170, S-00407, S-00152, S-00447, S-00731, S-00051, S-00626, S-00719, S-00561, S-00210, S-00146, S-00726, S-00694, S-00165, S-00523, S-00636, S-00720, S-00568, S-00293, S-00344, S-00437, S-00640, S-00518, S-00560, S-00658, S-00669, S-00433, S-00445, S-00538, S-00162, S-00717, S-00082, S-00718, S-00270, S-00113, S-00692, S-00512, S-00743, S-00607, S-00746, S-00751, S-00473, S-00633

Summary of Issues

Record of Protected Structures

The majority of submissions regarding the Record of Protected Structures (RPS) requested specific additions and deletions from the RPS. There were some requests to expedite and streamline the RPS process as well as some concerns that certain building typologies including industrial heritage, twentieth century heritage and Georgian mews were not adequately included in the RPS. Some submissions requested that NIAH recommendations for additions of Protected Structures in areas of heritage vulnerability be prioritised.

Some submissions suggested that all buildings over a century old should be considered for inclusion in the RPS and a number of submissions specifically requested Poolbeg Chimneys be included in the RPS.

Architectural Conservation Areas (ACA's) and Conservation Area's

Architectural Conservation Areas (ACAs) feature widely throughout the submissions with a number suggesting that there is a need to designate additional ACA's. A number of new ACA's are suggested including: CIE Estate, Inchicore; Rialto Buildings/Cottages; Grove Park, Rathmines; Tinters/ Fairbrothers Field/ Bru Caoimhin; Temple Bar; Dame Street/ Lord Edward Street/ Castle Street; Parnell Square; St. Stephen's Green; Pembroke Estate; Collins Barracks/ Arbour Hill/ St. Bricins; Harold's Cross; Marino; Thomas Street and Phibsborough.

A number of submissions stressed that our architectural heritage extends beyond Georgian Dublin to the Victorian, Art Deco and mid-century urban and suburban villages and streetscapes. One submission sought that newly designated ACA's should record exemplary street settings and buildings within the planned

suburbs that were developed at Cabra, Marino, Rialto, Crumlin, Kimmage and elsewhere from the 1930's onwards and which hold examples of mid-century residential development in Ireland. There was also support for preserving and promoting Ranelagh's Victorian streetscape.

There was a suggestion that underdeveloped Georgian backlands should be included in ACA's and viewed as key development opportunities with applicable design guidance. There was also a request for the ACA designation process to be expedited.

Re-Use of Heritage Buildings

There was significant support for the sensitive adaptive reuse of redundant or derelict historic building and support for more grants to improve the fabric of heritage buildings.

Many submissions called for the conversion of Georgian buildings for residential use, and the reuse of mews buildings to create a sustainable living city. There was support for promoting the 'South Georgian Dublin Townhouse Re-Use Guidance Document' as a means of adapting and re-using vacant and underused buildings from the Georgian era.

Some submissions expressed support for the reuse or adaptation of existing Protected Structures in innovative ways and called for initiatives to promote renovation, re-use and repurposing of historic buildings.

A number of submissions emphasised that restoration, refurbishment and adaption of existing heritage buildings will by retaining embodied carbon reduce the carbon generated by new construction and reduce the carbon footprint of Dublin City. It was submitted that the costs of insulating a Protected Structure should be reflected in grants.

A number of submissions received expressed the need for the new plan to extend the boundary of the Living City Initiative. There was support for a one-stop-shop service to be provided to owners of buildings to harmonise the Planning Authority's diverse functions including building control, planning, fire and architectural conservation.

There was strong support for the use of under-utilised upper floors in commercial premises and a concern that some conservation and modern building standards make repurposing these spaces difficult. Some submissions sought the relaxation of some of the requirements of Living-Over-the- Shop, if it is to be viable.

There was support for a pilot 'Conservation Area Regeneration Scheme' and a Heritage Action Zone in Dublin City Centre. There was also a request to formulate a Dublin City Centre and Buildings Renewal Plan.

A number of submissions called for urgent action on specific buildings such as Kilmainham Mill, Aldborough House, James Joyce House of the Dead, 15 Ushers Island and Debtor's Prison. There were calls for heritage plans to develop these buildings for cultural, educational or community use.

Dereliction of Protected Structures

There was considerable support for the Council monitoring all Protected Structures and working with owners to identify uses that will preserve Protected Structures at risk. There was general support for more use of Compulsory Purchase Order powers and for council to provide emergency maintenance works to Protected Structures that are deteriorating or endangered. There was support for engagement with communities in protection of important structures in their area. There was some support for a property guardianship scheme to be set up in Dublin. There was also support for more grants to improve the fabric of heritage buildings.

Re-use of Historic Buildings, which are not Protected

A number of submissions recommended that the upgrade/ adaptation of existing buildings for extended use should be the preferred option whenever this is viable, as this is a more carbon efficient alternative to demolition and rebuild. There was some support for a policy in the new Development Plan, which seeks the sustainable re-use of existing buildings as a priority both in consideration of their potential environmental value and their heritage value.

World Heritage Objective

There was some support for retaining the World Heritage objective for Dublin. The implications and benefits of exploring World Heritage status in the context of enhancing the quality of the public realm, city liveability, city pride and a sustainable tourism base was highlighted.

Height Guidelines

A number of submissions raised concerns about the impact of the current Height Guidelines on built heritage and views in the City. There were requests to adopt three dimensional modelling of the City to guide decision-making and allow proposals to be assessed strategically at an early stage. Some submissions recommended viewing cones be established from our significant monuments and buildings using the model of Paris, London and Edinburgh.

Archaeology

There was significant support in the submissions for enhancing the protection of archaeological sites and for the incorporation of archaeological finds within new building developments so that the historic development of the City can be seen. Several submissions cited Lidl on Aungier Street as a good example of where this had been done. There was also support for research led excavation and community archaeology projects.

One submission highlighted the need to record and map the survival of water-logged Viking Age and medieval archaeological stratigraphy so as to use this information to ensure planning and development policy is devised to ensure that the resource is passed on sustainably to future generations.

A number of submissions expressed support for the restoration and reconstruction of parts of the Historic City Walls. There was support for promoting the historic city walls and bringing them to life by lighting or rebuilding parts of them.

Industrial Heritage

A number of submissions highlighted the importance of protecting the City's industrial heritage. There was support for redundant industrial buildings being adapted for re-use with works carried out to standard conservation practice. There was a request for a policy objective to undertake a review and assessment of the impact of developments on the tangible and intangible cultural heritage at or in the vicinity of the industrial sites included in the Dublin City Industrial Heritage Record.

There were also submissions that supported a flexible approach to the re-use and regeneration of existing industrial heritage.

Some submissions sought the Docklands to be identified as an industrial heritage zone and for its lock gates, canal basins, bridges and graving docks to be preserved, restored and reused. Several submissions emphasised the need to ensure that new development in key regeneration areas including Docklands and Poolbeg do not negatively impact on built heritage and archaeology.

20th Century Heritage

A number of submissions highlighted the positive contribution many 20th century buildings have made to the City. There was support for their protection, refurbishment and reordering, where necessary, over replacement, within the context of the pressing need for enhancement and thermal upgrading.

Mews Lanes

A number of submissions highlighted the importance of enhancing and strengthening mews development policy. One submission requested an objective to review backland development in the Georgian core with the aim of guiding future planning applications on mews sites, particularly with regard to height. There was a general recognition of the opportunities the mews of the Georgian core can offer to increase the residential population of the area. There were also suggestions that the development of mews could help owners financially in repairing and renovating the primary Protected Structure on the site.

There was general support for strategically enhancing the public realm of mews lanes of the north and south Georgian cores to incentivise quality development.

One submission made recommendations that mews policy be strengthened and that there should be a stated preference for residential use in mews buildings. They also contended that the policy for protecting the traditional hierarchical relationship between principal buildings and mews structures needs to be reinforced. They requested that policy on mews development must enforce that where existing coach houses survive, proposed adjacent development should graduate to their height appropriately.

Georgian Core

Several submissions emphasised the need for refurbishment and where appropriate, subdivision of Georgian Townhouses befitting 21st century needs and recommended adoption of the recommendations of the 'South Georgian Dublin Townhouse Re-Use Guidance Study.'

Some submissions sought a residential vision for Dublin's Georgian core and expressed concern at the overdevelopment of offices in the South Georgian core. Some submissions expressed support for the use of heritage buildings in the North Georgian core for social housing but some had concerns that there is an overconcentration of emergency and homeless accommodation in this area. It was put forward that the present Living City Initiative would continue to have little or no effect in the North Georgian core so long as the overconcentration of poor quality and temporary accommodation persists.

Mountjoy Square

There was some concern about houses on Mountjoy Square subdivided into substandard accommodation and an overconcentration of social housing in the area. A number of submissions sought a plan to transform the Square.

O' Connell Street

A number of submissions expressed concern at the current poor state of O' Connell Street and called for social, economic and cultural revival of the street. Submissions sought measurable improvements in the street during the plan period.

Cathedral Quarter

There were a number of requests for recognition of the national and international significance of the Palace of St. Sepulchre and calls for development of a Cathedral Quarter incorporating the former Palace of St. Sepulchre, (currently part of Kevin Street Garda Station), Marsh's Library and the Deanery of St. Patrick's Cathedral.

Markets

Submissions sought that historic markets such as Smithfield, Iveagh Markets, Moore Street, and the Victorian Fruit and Vegetable Market be renovated and preserved as permanent market spaces. There were a number of requests for heritage plans for social market places that are run down.

There were also a number of submissions supporting a Moore Street Plan incorporating the National Monument, street trading and the street's social history. There was support for a body similar to Temple Bar Properties but with a wider conservation and democratic mandate appointed to prepare and implement a detailed plan to oversee the Moore Street areas future development.

Canal Heritage

There was support for the protection of canals and their associated structures and landscape setting.

Street Furniture

Several submissions emphasised the need to protect unique street furniture, railings and lighting as key heritage features of areas

Education Programmes

There were numerous requests for a programme of civic engagement and promotion of heritage to ensure the survival of 18th, 19th and 20th century building stock.

Markers/ Plaques Beside Historic Buildings

There were a number of requests for greater use of plaques denoting the history of buildings including the people who lived in them and support for markers or plaques on any building in the City that is pre-1700.

Heritage Plan/ Cultural Heritage Quarters

A number of submissions requested heritage plans for specific areas such as the markets, The Liberties, 15 Usher's Island, Boland's Mills, Kilmainham, The '12 step Plan' for O'Connell Street and 1916 Historic Quarter Plan.

There was also support for developing a 1916 Historic Cultural Quarter, a 'Gardiner Trail' or 'Literary Trail', Built Heritage Trails, a maritime heritage quarter including Ringsend and environs and a Wide Street Commissioner Museum House.

Other Issues

A number of submissions raised concerns regarding enforcement compliance in respect of Protected Structures and Architectural Conservation Areas. One request suggested a key policy objective in the new plan to establish a dedicated Heritage Planning enforcement unit manned by conservation accredited staff. There were also concerns raised in relation to advertising signage damaging the character of built heritage and the impact of visible infrastructure such as signal boxes, cabling and lighting on built heritage.

A number of submissions expressed concern at the planned closure of the Georgian House Museum and contended that it should stay as a museum to provide an educational and historical window to life in Georgian Dublin. There was also support for an objective in the new Development Plan to protect and support the unique character and heritage of maritime and coastal villages.

Chief Executive's Response in Relation to Built Heritage and Archaeology

Record of Protected Structures

The requests for additions and deletions to the RPS are acknowledged. Individual proposals for inclusion on the RPS as appropriate are constantly reviewed and assessed as part of the ongoing work of the Conservation Section.

Recommendations for the inclusion of a structure on the RPS will be considered against the categories of special interest (architectural, historical, artistic, cultural, scientific, social or technical interest) set out in the Planning and Development Act, 2000 as amended. Any structure proposed for removal from the RPS will be assessed using the same procedure.

Proposed additions/deletions to the RPS are being progressed using a methodology that incorporates the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the recommendations of the Minister/National Inventory of Architectural Heritage. This methodology prioritises 20th century structures, industrial structures, early buildings and under-represented building typologies. The Record of Protected Structures will be examined as part of the Development Plan

review and consideration given to the scope for the making of appropriate additions, along with deletions and amendments, to the RPS.

Architectural Conservation Areas (ACA's) and Conservation Area's

Proposals for new Architectural Conservation Areas (ACAs) and Conservation Areas to add to the 24 ACAs already adopted across the City will be considered in the preparation of the Draft City Development Plan. In a review of the current Conservation Strategy and programme for ACA assessment, it is intended to consider these proposals and other appropriate areas and this will be detailed in the Draft Plan. Such an assessment will have regard to relevant criteria including the provisions of Chapter II of Part IV of the Planning and Development Act, 2000 (as amended) and Chapter 3 of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Re-Use of Heritage Buildings

International charters and conventions have informed and influenced government policy and legislation for protecting architectural heritage. The various charters require that all interventions respect the physical, historic and aesthetic character and integrity of cultural property. The challenge is to find appropriate ways to enable a structure to evolve while retaining its character and special interest. Dublin City Council is required to have regard to Government Policy including the 'Architectural Heritage Protection Guidelines for Planning Authorities (2011)'. This is reflected in the policies and guidance set out in the current plan and will be brought forward to the draft.

Most Protected Structures are adapted and modified appropriately through the Development Management (planning application) process. All development proposals are assessed having regard to the provisions of the current Development Plan, the Planning and Development Act, 2000 (as amended) and Government policies and guidelines.

An over-arching issue is the on-going need to balance the often competing demands of a modern city in terms of consolidation and future growth with the need to protect the intrinsic character of protected buildings. There is an inherent need to ensure that Dublin City is a real and vibrant city where people live and work. People will be encouraged to live in the historic core and the challenge will be to provide sensitive and environmentally sustainable restoration of historic properties, suitable for modern living. It is recognised that there are historic buildings across the City that remain underutilised and vacant, particularly on the upper floors. This is a serious issue for all cities and calls for creative responses.

Ensuring that new investment, regeneration and intervention acknowledges and respects the significant archaeological and architectural heritage of the City, while encouraging regeneration and change is a key challenge that will be pursued through appropriate policies and objectives for the protection, enhancement and management of built heritage and archaeology.

It is well recognised that the 'greenest' building is most often one which already exists, and its continued use or adapted reuse will greatly assist its survival. Identifying suitable and viable uses for certain heritage buildings can be difficult and

the Development Plan review will re-examine the issue of appropriate uses, where these support the over-arching conservation objective. Existing policies and objectives in relation to re-use of heritage building will be reviewed and updated as part of the preparation process for the Draft Plan.

Dereliction of Protected Structures

Part IV Chapter 1 of the Planning and Development Act, 2000 (as amended) sets out the legislation regarding Protected Structures. Section 58 specifically refers to the duty of owners and occupiers to protect structures from endangerment.

Dublin City Council maintains a Buildings at Risk (BAR) register where Protected Structures that are considered to be at risk from neglect or wilful damage are recorded and action taken to ensure their survival and removal from being at-risk. This is largely an operational matter and provides an indicator both for the condition of individual assets and the identification of trends in the condition of the historic environment of Dublin City. It also provides an important indication of how the condition of the historic environment relates to geographical areas, ownership and type allowing the identification of opportunities, pressures and threats and to prioritise where time and funding are focused.

Objective CHC07 of the current City Development Plan provides refers to the Building at Risk Register. This objective will be reviewed and updated and further policy support for Buildings at Risk will be considered.

Re-use of Historic Buildings, which are not Protected

Section 16.10.17- 'Retention and Re-Use of Older Buildings of Significance which are not Protected' as provided in the current City Development Plan refers to the demolition of older buildings which are not protected but which make a positive contribution to the character and identity of streetscapes and the sustainable development of the City.

Many older buildings and structures across the City that don't meet the criteria for inclusion in the Record of Protected Structures, make a positive contribution to the built environment of the City's streets, villages and places. Policy regarding the retention and reuse of buildings where they clearly make a positive input to the streetscape and sense of place will be reviewed in preparing the draft Development Plan.

World Heritage Objective

Policy CHC13 of the current City Development Plan provides support for pursuing a World Heritage nomination for the Historic City of Dublin. The submissions in relation to retaining this policy are noted and the matter will be considered further in the preparation of the Draft Plan.

Height Guidelines

Section 2.8 of the Urban Development and Building Height Guidelines for Planning Authorities refers to historic environments and their sensitivity for large scale and tall buildings. It is advised that Planning Authorities must determine if increased height buildings are an appropriate typology or not in particular settings. Section 2.9 of the Guidelines states that in order to consider proposals in an integrated and informed

way, an urban design statement addressing aspects of impact on the historic built environment should be submitted as well as a specific design statement. Other relevant legislation and guidance includes the provisions contained within Part (IV) Planning and Development Act 2000, as amended, regarding architectural heritage and associated character/ setting; the Architectural Heritage Protection-Guidelines for Planning Authorities (DEHLG) and Shaping the Future- Case Studies in Adaptation and Reuse in Historic Urban Environments (DAHG) 2012. The new draft Development Plan will consider the issue of impact of height on the Built Heritage of the City and will use performance based criteria in new policies and objectives to guide future height and densification in accordance with the building height guidelines.

Archaeology

The contents of the submissions on archaeology are noted and will inform the preparation of the Draft Plan. The significance of the historic city walls is acknowledged and an appropriate policy framework for their protection and enhancement will be set out in the Draft Plan. Appropriate measures to support the incorporation of archaeological features in developments will also be considered.

Industrial Heritage

The importance of industrial heritage and its protection is acknowledged and it is an objective of the current City Development Plan to have regard to the City's industrial heritage particularly in the preparation of plans and in planning applications. The industrial heritage policy including policies and objectives to protect and restore the industrial heritage of the City's waterways, canals and rivers, retaining features such as walls, weirs and millraces will be updated and reviewed as part of the new draft Development Plan.

20th Century Heritage

In relation to protecting 20th century buildings, the current plan affords protection to this type of building under Policy CHC3. Policies and objectives in relation to 20th century heritage will be reviewed and updated in the Draft Plan. The National Inventory of Architectural Heritage (NIAH) ongoing survey of the architectural heritage of the City has identified 20th century structures recommended for inclusion on the Record of Protected Structures. These will be considered as part of the ongoing review of the RPS.

Mews Lane

Section 16.10.16- Mews Dwellings of the current City Development Plan provides for a unified approach to the development of residential mews lanes. It is acknowledged however, that many mews lanes remain underdeveloped and have potential to facilitate sensitive infill development in the City. Mews lane policy will be reviewed and updated to support and facilitate appropriate Development Management as part of the new draft Development Plan. Consideration will also be given to the need for greater guidance on the scale and form of development along such lanes, particularly in the Georgian core.

Georgian Core

The importance of preserving the streets and character of the Georgian core and facilitating regeneration, cultural and residential use in the area is acknowledged.

Mixed use tenures are supported. There is policy within the current plan on overconcentration of particular transient accommodation typologies. This will be further reviewed and proactive policies to support mixed use tenure and avoidance of overconcentration of certain housing types will be considered. The emphasis on the reuse of Georgian stock for permanent residential accommodation will also be supported in the Draft Plan.

Mountjoy Square

The continued regeneration of the North Inner City will be considered as a priority of this Development Plan review. Current policy promotes the provision of apartments in historic buildings based on national guidance and the sustainable reuse of buildings. This will be reviewed as part of the Draft Plan.

O'Connell Street

The ongoing regeneration of O'Connell Street is acknowledged as a priority given that it is a primary thoroughfare in the capital. The new Development Plan will examine policy approaches to improve the public realm and setting of O'Connell Street and will continue to promote the regeneration of the Parnell Quarter, which will provide a synergistic link to O'Connell Street.

Cathedral Quarter

There is currently a policy in the Development Plan, Policy CHC21 which states *'Dublin City Council recognises the exceptional archaeological, architectural and historical significance of the St. Sepulchre's Palace complex (Kevin Street Garda Station) and will work with all stakeholders and interested parties to develop a Conservation Plan to safeguard the future of St Sepulchre's, identify appropriate future use(s) that reflect its historic and architectural importance and unlock the cultural tourism potential of the site in the context of the cathedral quarter and the historic city.'* This policy will be reviewed and updated in the draft Development Plan.

Markets

There are various policies and objectives in the current City Development Plan in relation to Moore Street (Policy CHC17, Policy CHC20) which will be reviewed in the Draft Plan. The regeneration of the Moore Street area will be a key priority on the next plan with appropriate policies and framework for its future development set out. It is acknowledged that the historic markets play a key role in promoting the vitality and viability of the City Centre and proactive policy for their protection and preservation will be set out in the draft plan.

Canal Heritage

There are various policies and objectives in the current City Development Plan which protect canals and their associated structures and landscape setting, (Policy CHC14 and Policy CHC18). These policies will be reviewed and updated in the draft City Development Plan.

Street Furniture

Policy CHC15 of the current City Development Plan is *'to preserve and retain in situ, historic elements of significance in the public realm including railings, milestones, city ward stones, street furniture, ironmongery, and any historic kerbing and setts*

identified in Appendices 7 and 8 of the development plan, and promote high standards for design, materials and workmanship in public realm improvements. Works involving such elements shall be carried out in accordance with the Department of Arts, Heritage and the Gaeltacht Advice Series: Paving, the Conservation of Historic Ground Surfaces.'

This policy will be retained, updated and reviewed in the draft City Development Plan.

Education Programmes

Dublin's built heritage and archaeology is a distinguishing feature in an increasingly homogenised world. It is a unique asset, which forms part of our cultural identity. A key challenge will be to promote a deeper understanding of our built heritage and archaeology as an authentic, unique and finite resource. Increasing public awareness of the cultural value and social and economic significance of the City's built heritage will be required.

The widening appreciation of our heritage, culture and creativity also presents significant potential for collaboration with community, professional and institutional stakeholders across the various cultural spheres.

The City Council's Conservation Section promotes awareness of Architectural Conservation and Heritage in various ways including by presenting a number of conservation lectures as part of the annual 'Conserving Your Dublin Townhouse' conservation course offered by the Georgian Society (in association with the Heritage Section of Dublin City Council). The City's Heritage Plan, which is being reviewed and updated in conjunction parallel to the Development Plan is anticipated to propose initiatives to promote civic engagement with heritage. Appropriate policies to support greater awareness and education regarding our built heritage will be set out in the plan.

Markers/ Plaques Beside Historic Buildings

This is largely an operational matter managed by the City Council's Street Naming Sub-Committee who consider proposals for plaques denoting the history of buildings and the people who lived in them. It is outside the scope of the Development Plan.

Heritage Plan/ Cultural Heritage Quarters

These requests for Heritage Plans and Cultural Heritage Quarters will be considered as part of the proposed Dublin City Heritage Plan (which is being prepared through a separate process).

Other Issues

The contents of the submissions in relation to implementation of enforcement in respect of Protected Structures and Architectural Conservation Areas are noted. Enforcement is an operational matter and outside the scope of the Development Plan. The submissions on the Georgian House Museum are noted. This is outside the scope of the Development Plan.

An assessment of the need for provisions to protect and support the unique character and heritage of maritime and coastal villages will be considered in the new Development Plan.

Chief Executive's Recommendations in Relation to Built Heritage and Archaeology

Built Heritage

- Provide for the protection, preservation and promotion of the built heritage, including architectural heritage and archaeological heritage.
- Consider the inclusion of additional structures to the RPS having regard to the ongoing update of the National Inventory of Architectural Heritage.
- Review and identify priority areas of special historic and architectural interest as potential Architectural Conservation Areas (ACA's) for inclusion in the Draft Development Plan.
- Examine measures to encourage the retention and re-use of historic structures within the City.
- To support the Building at Risk Register.
- Consider and augment policy provisions with respect the retention and re-use of older buildings of significance.
- Consider appropriate performance based criteria in the height strategy that has regard to the impact of taller buildings on sensitive historic environments and buildings.
- Consider an appropriate policy in support of World Heritage nomination for the Historic City of Dublin.
- Provide appropriate policy support for the protection of 20th century buildings of merit.
- Update mews policy and review development management standards and guidance for mews development.
- Consider policies to support the regeneration of the Georgian core.
- Acknowledge the importance of the Sepulchre's Palace complex.
- Support the retention and enhancement of historic markets in the City.
- Protect the canals, their associated structures and landscape setting.
- Support the preservation and retention of historic elements of significance in the public realm.

- Support education programmes and greater awareness of our built heritage.
- Recognise the value of cultural heritage to the City and support the implementation of the Dublin City Heritage Plan.

Archaeology and Industrial Heritage

- Recognise the importance of our archaeological resource and provide appropriate policies to ensure its appropriate retention and recording.
- Protect and enhance the industrial heritage of the City.

Theme 9: Culture

Submission Number(s):

S-00424, S-00331, S-00108, S-00414, S-00727, S-00258, S-00026, S-00128, S-00357, S-00247, S-00565, S-00322, S-00484, S-00396, S-00477, S-00552, S-00728, S-00020, S-00080, S-00689, S-00686, S-00031, S-00037, S-00049, S-00060, S-00064, S-00067, S-00073, S-00079, S-00014, S-00021, S-00030, S-00033, S-00035, S-00076, S-00088, S-00101, S-00103, S-00114, S-00139, S-00144, S-00130, S-00143, S-00145, S-00164, S-00174, S-00181, S-00192, S-00195, S-00218, S-00219, S-00221, S-00242, S-00251, S-00261, S-00273, S-00283, S-00288, S-00292, S-00297, S-00303, S-00309, S-00319, S-00336, S-00342, S-00361, S-00366, S-00400, S-00411, S-00429, S-00439, S-00462, S-00463, S-00472, S-00498, S-00507, S-00530, S-00566, S-00571, S-00602, S-00630, S-00632, S-00634, S-00160, S-00161, S-00171, S-00180, S-00196, S-00199, S-00205, S-00227, S-00230, S-00233, S-00239, S-00264, S-00268, S-00286, S-00290, S-00302, S-00310, S-00323, S-00332, S-00380, S-00385, S-00399, S-00401, S-00408, S-00432, S-00435, S-00443, S-00445, S-00486, S-00490, S-00522, S-00527, S-00541, S-00542, S-00550, S-00551, S-00572, S-00574, S-00582, S-00583, S-00586, S-00590, S-00595, S-00605, S-00606, S-00615, S-00619, S-00245, S-00454, S-00664, S-00663, S-00651, S-00170, S-00152, S-00447, S-00379, S-00637, S-00731, S-00729, S-00440, S-00626, S-00719, S-00726, S-00355, S-00371, S-00272, S-00277, S-00428, S-00517, S-00679, S-00284, S-00523, S-00720, S-00293, S-00326, S-00344, S-00136, S-00437, S-00442, S-00640, S-00597, S-00560, S-00529, S-00658, S-00674, S-00673, S-00669, S-00433, S-00538, S-00162, S-00717, S-00312, S-00676, S-00167, S-00735, S-00512, S-00457, S-00743, S-00607, S-00746, S-00466, S-00397, S-00473, S-00633

Summary of Issues

Overview

Culture was a strong theme in many of the submissions received as part of the pre-draft consultation process. The current experience of Covid and the devastating impact it has had on the ability of people to enjoy and engage in a range of cultural activities is likely to have influenced this; alongside the impact of wider trends of changing development forms on the growth of the City.

The submissions place particular importance on the role culture will play post-Covid in encouraging people to return to the City. Many submissions called for the Council to take the lead in supporting and aiding the revitalisation of cultural spaces in the City to allow people reconnect. Some submissions sought more research on this issue, including mapping and the production of a new cultural plan/strategy. Also called for within the plan is a wide definition of culture space to include social, performance, exhibition, marketplaces, workspaces, entertainment spaces (including cinemas, music venues, nightclubs) etc.

Night Time Culture

A significant number of submissions relating to culture specifically focussed on night time culture and the need for more nightclub venues within the City and suburbs; the

need for longer opening hours; importance of sound insulation and identification of suitable locations at a remove from residential areas. They sought policies to protect existing venues and historic public houses within the City. It was stated in some submissions that the plan should follow other European cities and classify night-time cultural activities, including nightclubs, as cultural assets to be protected. Also highlighted was the need for new smaller venues and music performance spaces and that opportunities to have multi-use spaces including the use of food markets or conference centres as nightclubs in the evening or converting car parks should be explored.

Some submissions sought a round the clock opening policy for night time uses in the City to give greater variety of use to venue spaces, staggered departure times, supported by safer streets and public transport. Some sought a key public role to co-ordinate all these issues through the appointment of a night time “mayor/tsar” leader. It is suggested by a number of submissions that Culture Night should be expanded to being a once a month or once a week event to diversify the cultural offer in the evenings within the City. It was suggested in some submissions that there needed to be greater investment in night time amenities and activities that were not focussed around alcohol as well as the need to support greater activities for young people and teenagers.

A number of submissions raised the need for a balance between night time cultural uses and residential use and the avoidance of an over concentration of late night uses in larger clusters deterring residential uses in the City. Others sought clustering and staggered closing times to allow for better management by Gardaí of the space at night. Also raised was the negative impact of clustering of night time uses, such as at Temple Bar, undermining the area’s cultural function.

Increased engagement with local residents when establishing late night venues and licences, with revised bye laws on noise and light pollution, was raised as well as the need to diversify locations by the expansion of night time cultural activities to the suburbs and other non-traditional spaces such as retail centres, urban villages or industrial estates. Also suggested was the need for clear policies on positioning of uses in the City, with “quiet” streets and main streets having different uses.

Other suggestions included a floodlighting programme of significant landmarks and important public buildings, longer opening hours for public parks and museums/buildings to provide free healthy attractions and also making use of public spaces in the City for cultural/event use at night and having a flexible approach to spaces that could evolve through a 24hr period.

As regards development and construction, a number of submissions highlighted that a variety of club spaces are needed as well as practice space; and that the use of unconventional spaces for artistic/cultural uses should be encouraged. A large number of submissions raised the importance of preserving cultural spaces from redevelopment, and there should be a “culture clause” i.e. that cultural or music spaces should not be demolished unless they are replaced within the new development. There were calls for new buildings beside existing cultural spaces to be obliged to make sure their new buildings are adequately sound proofed, and a suggestion of mediation services to resolve issues.

Emphasis is placed by some on promoting smaller independent operators or subsidising art and music venues. It was also highlighted in some submissions that opportunities to use new/existing basement spaces for dance/music should be explored, particularly in all larger regeneration areas or major redevelopments in the City as they can be fully sound insulated and designed for purpose. Also raised was that high rise buildings should be required to provide a cultural/event space or venue at the top floor (with food uses below to provide noise separation from residential). At a general level, it is suggested that a percentage of music/entertainment space should be required in any new planned regeneration quarter or district to create more characterful places; and that flexibility in building design such as conference rooms or canteens should be multi-functional to convert to nightclubs or music lounges at night.

Some submissions raised issues around reforms to licencing laws to make it easier for cultural spaces to have a drinks permit, and to deregulate the sector, others raised concern such a change could have on residential amenity for current and future city centre residents.

Cultural Quarters, Spaces and Institutions

This topic saw a number of very positive submissions supporting what the Council has been actively working to deliver over the lifetime of the current Development Plan. The submission received from the OPW highlights significant cultural institutions within the City, and the ambition of the OPW to work with DCC to improve, protect and expand the cultural opportunities for the City.

Many submissions wrote of their support for the proposed Parnell Square City library project, and a number sought it's delivery to its fullest extent as a cultural hub with a range of cultural facilities included. Also suggested for this quarter is the creation of a north City core cultural space to include the linking of the Abbey and Gate aligned to a re-visioned cultural quarter at Moore St. A number of submissions made suggestions for key additions to this quarter including a new City Opera House (also hosting Ballet Ireland) and a Gallery of Photography and creative media (with a focus on digital art forms and outreach and engagement with young people) that provides exhibition, workshop and training opportunities. O'Connell Street was suggested as the most historically appropriate location for such facilities.

The view is expressed that O'Connell St. generally should be invested in to develop it as a cultural centre for the City. One submission pointed out that there is a need for large scale impressive museum spaces that can accommodate big international scale shows and events and bring families back in to the City Centre. Also suggested was the relocation of the Abbey to O'Connell St.; the designation of the area around the Abbey as a cultural quarter; and the use of the traffic island at Parnell Square for historical sculpture or kiosk to bring life to the area. A number of cultural uses are put forward for the former Ambassador cinema to link in with this potential cultural quarter such as opera house, music or dance theatre or cinema.

The second cultural quarter discussed in many submissions was the development of a cultural quarter around Kilmainham and Inchicore villages linking the War Memorial Gardens, RK, IMMA, Gaol, Richmond Barracks and Goldenbridge Cemetery, and

Kilmainham Mill with potential linkages to Collins Barracks and Heuston/Royal Hospital. It was suggested that a transport museum at Inchicore on Irish Rail lands would be a positive initiative.

The third area raised was Temple Bar. Concern is expressed by some that more needs to be done to develop Temple Bar as a cultural centre with support for small independent art and culture projects in the area in order for them to survive. Some stated that objectives listed in the current plan (CHC28 CHC40) have not been acted on. Also raised is the need for Meeting House Square to be better managed and used as an outdoor cultural hub. Reference was made to the 1999 City Development Plan and how it was more supportive of Temple Bar than recent plans.

Both Dublin 8 and NEIC are named as being appropriate to have special status to foster their potential for arts and culture, with an emphasis on supporting local artists; with integrated and diverse options for living and working. Support is expressed for DCC initiatives in both areas, at the D8 Creative Campus and LAB, and also for the proposed Poolbeg West Creative Studios.

Other views expressed were that at least one cultural quarter should be identified that has a focus on Irish language and culture and that the Council should work with Irish language organisations to develop these. It is sought that there is greater use and visibility of the Irish language in the City with supports for the Irish speaking community. There should be a clear policy in the plan that the Irish language and Gaelic games should be promoted.

One submission highlighted the importance of the lighthouse cinema in Smithfield as a cultural resource and that the Mr. Metropole statue should be relocated to the square. Also raised was the need for a new Museum of Dublin, and a new Georgian Townhouse Museum. One submission expressed support for preserving the ESB owned Georgian Museum. A criticism is made of Docklands in its failure to deliver any viable space for hosting music and arts.

It is suggested in some submissions that there needs to be greater diversity in quarters that reflect the diverse population and history of immigration, such as a Jewish Quarter (with museum at Fairview suggested in one submission), and an Italian Quarter. It is put forward that there needs to be more signage and map boards for cultural quarters highlighting what is available. The development of cultural trails, with use of commemorative plaques is also suggested. One suggestion given is that there could be offshoots of the National Galleries to improve cultural attractions in the wider city.

Also pointed out in some submissions was the range of creative industries within obsolete industrial estates and the need for some to be designated and allowed to evolve into cultural incubation spaces with a mix of music/dance venues, crafts, arts, religious spaces etc. One submissions suggested cultural institutions should collaborate more with technology, to support growing the creative industry sector. An additional suggestion was a policy that where cultural spaces are needed, specified and provided by developers that a “quit-pro-quo” policy of additional density and/or height should be given, as happens in other jurisdictions (Sydney was cited).

Artists Work & Living Spaces

Quite a number of submissions highlighted the lack of affordable artist workspaces within the City, and the impact that has on the cultural life of the City- driving people to live and work elsewhere. Some referred to the lack of viable incomes for many artists and the need for some form of universal basic income. Considering the challenges facing this sector, many expressed the view that the Council should be taking the lead in provision of cultural and artistic workspaces. It is suggested that DCC should do an audit of spaces it owns and aim to make more available to artists and that all public institutions should have a residency programme where artists are given a space for a fixed period of time.

One submission suggested a grants scheme be made available to help private landowners provide artist spaces. Support is expressed by many for the idea of the Council supporting/investing in new workspaces such as the new artist complex at the D8 Campus. The DDC study “Artists Workspace Findings Report” which found that 41% of artists were seeking workspace is referenced and it is emphasised that more needs to be done on this issue. One submission highlighted the lack of artist spaces in the North Central area.

Also pointed out on this topic is that many artist workspaces are located on vulnerable sites/buildings and get pushed out as land values rise; and it is suggested that the Council needs to assist in providing viable, stable locations for emerging grassroots artistic and cultural spaces; similar as to what happened in the development of Temple Bar. The view is expressed that cultural spaces often develop organically with no assistance in newer developing areas as these areas are affordable - but then they get displaced; and, therefore, need to be protected from regeneration.

The affordability, suitability and flexibility of space for working for both artists and for the creative industries is raised with issues such as the need for larger spaces for sculpture work and making use of publicly owned heritage buildings or derelict buildings for workspaces identified. Also referenced in this area is the need to develop and support creation spaces for street, circus and spectacle art forms as there are very little non-commercial spaces available to train, practice and study. . Examples elsewhere in Glasgow (the Briggait), Barcelona, Paris, Great Yarmouth are cited. Also referenced is the need for development levies to be used to aid delivery of longer term studio solutions similar to LAB and RUA RED.

One submission pointed out the importance of learning from previous mistakes on the best approach to leverage funding and getting support for the provision of community artist and culture spaces. The need long term funding is flagged so that spaces located in privately owned buildings can develop strategic plans without worrying they will lose their premises - example is A4 Sounds off Dorset St which is providing a quality creative space supporting artists. The loss of Hendrons at Broadstone without any replacement is also referred to. The point is made that culture is developed from the ground up and it needs small scale spaces to grow and there is a need to invest in fine grain provision. One submission made the point that the provision of a diversity of artist spaces would support the City by avoiding the monotony of global brands.

Other supports flagged included establishing a DCC working group to support provision of creative space; making use of “meanwhile space” derelict buildings and underused space as collaborative spaces; requiring inclusion of creative spaces in all new and reconfigured developments of scale (including revising downwards the thresholds in CHC31); and establish incubator programmes and “agent of Change “ initiatives during construction. Some submissions sought that vacant retail and other spaces within the City should be made available to artists, artisan craft and other creative uses; and that the plan include a policy and incentives to achieve this.

Theatres and Local/New Community Arts and Cultural Spaces

Quite a number of submissions looked at how arts and cultural spaces are used and distributed across the City; particularly in relation to local facilities and those catering for the amateur arts. Some submissions sought that the plan recognise the important role arts and culture have in harnessing place making, and should be built into design of regeneration areas across the City. A number of themes emerged in relation to these namely:

- i. The need for a civic theatre in the City Centre to cater for small scale independent productions. Smock Alley Theatre is suggested, which could be invested in to take up this role.
- ii. A need for small community and concert theatre for arts activities/meetings/exhibition spaces in the urban villages in tandem with other facilities such as cafes, men’s sheds, local museums and libraries, public realm/market areas to provide attractive places for people to meet and interact. A number of villages are named as lacking such space, including Phibsborough (as part of Dalymount or the old Mill are suggested), Ranelagh, Rathmines, D3, Drimnagh, Harold’s Cross, Crumlin, Rathmines, Terenure (Evergreen Hall suggested), Kilmainham Mills (as an opportunity space). Some submissions pointed out that some arts spaces have been lost within villages and no opportunity to replace them has been made. Also suggested for such spaces is the inclusion of digital creative hubs to support enterprise in the creative industries. The North Central and North West areas are named as lacking in local cultural activities, some of which could be hosted in existing sporting and other facilities.
- iii. The need for rehearsal spaces and large volume space to produce theatre work in and/or design, build and prepare sets.

The view is expressed in some submissions that every community should have an arts centre to complement the sports centre; where local bands can hire a room to practice, artists can use for short term workshops, dance classes can be held, dance companies rehearse, and schools groups can prepare for parades/events and work can be displayed and hosting of festivals. It is suggested that old buildings could be repurposed for this where the opportunity arises. It is recommended by some that new cultural spaces should be provided in new developing areas and cross subsidised both in construction and running costs. Also sought is more long term investment in contemporary art and music within urban villages as part of a wider community and arts setting.

Libraries are referenced by a number of submissions as being uniquely placed to connect citizens into the City's cultural offerings through a network of exchange. Calls are made for libraries to have longer opening hours, to host a wider range of events and to expand their role as "digital" libraries. The example of a successful investment by DCC with the new Coolock Hub is welcomed, and it is suggested that these spaces have great potential to work with children and minority groups and encourage their engagement with culture, classes and a range of evening activities for all. Also suggested is that they should play a role as local museums and archives. Libraries could also host widening of the Creatives Associates programme, (part of Creative Schools). The IFI film club is given as an example of a good outreach project for children that libraries and local arts hubs could engage with.

Support is given and sought for multi-use creative hubs within the City that have developed, such as the Chocolate Factory, which is seen as a great example of using existing space in an older industrial building. It is suggested that many cultural spaces are only used during the day, and they should open later for other cultural purposes rather than always looking for new spaces.

The point is made that there is need for clarity on how occupiers of privately owned cultural spaces are selected/supported to be able to take on the running costs of new spaces, to avoid future vacancy. Also sought by one submission is a policy to protect a commitment given by TUD that the theatre and other arts uses under development in Grangegorman will be available to local community. A number of submissions state that there should be specific recognition for the maritime community of Ringsend and its literary associations with Joyce. Dublin Port Company's submission points to the significant investment they are making in cultural space for the City through its new Heritage Area at the Graving Docks and Pumphouse, which will be made available for cultural events and exhibitions.

Music

Music was a strong theme across a number of submissions from a number of perspectives. It is sought by some that the new plan explicitly state that music is central to culture. The point was made that music requires purpose-built spaces for rehearsal, recording performance and broadcasting; with sound proofing, acoustics, musical instruments (pianos, drum kits for example), with a wide range of sizes available - from large orchestra size to individual performers. General arts/theatre spaces are seen for the most part as not being suitable. Also raised is that these spaces need to be affordable and accessible for amateur musicians; and well distributed across the City. An audit of spaces is suggested, and action taken to address gaps. One point highlighted is that there are very few if any publicly owned rehearsal or studio spaces in Dublin; and all spaces are under pressure due to music programmes such as BIMM (British and Irish Modern Music Institute), with supply not meeting demand.

It is put forward by some submissions that music spaces should be included in all major regeneration areas, in all cultural developments and that the Parnell Square City Library and cultural centre should include music spaces to cater for this need. The point is made that the 2016 City Development Plan included no reference to achievements in delivering space for music in Dublin. Some submissions sought the provision of both workspace and housing for musicians, composers and music sector

workers. The inclusion of an objective is sought to provide for a new music hub within the City with performance venues, spaces, meeting rooms, collaboration space, community hub, rehearsal, studios, recording and post-production facilities that is accessible, visible, central and can act as point of support for the music sector. It is put forward a music hub would preferably be located within a cultural quarter; that would provide, particularly for young people an accessible space for cultural expression and engagement. Also raised is the role of Dublin City Council in supporting and promoting music festivals and that more can be done particularly, in the promotion of niche/less mainstream music festivals.

Art

A number of submissions addressed how art should be dealt with in the Development Plan, with particular emphasis on art in the public realm. It is suggested that there should be a pro-active approach to public art; with new places for art planned as part of masterplans/local area plans. The important role of public art in accessible locations and allowing people to engage with art outside of galleries is highlighted in some submissions. It is also commented by some that public art needs to accommodate digital forms, such as photography and graphics, and that there is an opportunity to enrich untapped spaces for displaying digital art. It is suggested that the community should be consulted on new art proposals and that there should be more promotion of more accessible and quality street art including outdoor galleries, street art trails and more murals such as the signal boxes to highlight the history of a community.

One submission recommended consideration be given to developing Dublin as a centre of excellence for creativity and experimentation in the arts through investing in cultural institutions and encouraging creativity linking across arts, science and enterprise. Another submission suggested that the Council examine the possibility of engaging “artists in residence” for major public construction projects to generate cultural records for the lifecycle of the project.

A number of comments on sculptures were made (i) the return of the statue “Aspiration” to the Treasury building; (ii) that Mr. Metropole statue should be relocated to Smithfield square, and (iii) a new piece of sculpture should be commissioned for College Green.

Events & Cultural Spaces

A wide range of submissions were made with regard to events and festivals. Whilst a significant portion raised points that are not planning related, the message of support for developing and expanding such events is very positive.

Key points made included the need to encourage provision of new spaces in the City and urban villages; the lack of useable public spaces equipped to host events; the need to make use of parks on a regular basis for more events, music and art exhibitions; and the need to have more covered outdoor performance/exhibition spaces within the City. Also pointed out is the need to identify and preserve suitable locations within the City for circuses and similar touring cultural events.

It is suggested in one submission that a City Events Company is established to oversee all events and identify opportunities for new ones and that the real economic

benefit of events should be researched independently. The point was made that hosting public events is costly and challenging and should be made more accessible. Markets are raised by some submissions, seeking that they are seen as cultural assets and made use of as cultural spaces outside of “retail” hours; and similarly other public buildings during times of under use (such as schools, public offices during weekends, holidays).

Inclusivity

Some submissions received raised the need to engage with minority groups and new Irish, with one suggesting a House of Languages and Cultures. Inclusivity was also raised in the context of encouraging arts groups to engage with minority groups, people with disabilities, young people and socially excluded in a positive proactive way. The point was also made that culture offer has much to contribute to make the City attractive to families and young children, and the importance of cultural experiences for children from deprived areas.

The need for cultural institutions to adapt their buildings and exhibitions to make them more accessible to all to engage with and enjoy is made; and the importance of using technology is raised - with suggestions including spoken word recordings and braille information boards for venues. Reference is made to the Arts Council and the work they have done in re-orienting their process of engagement and grants to address inadequate or imbalanced public access and participation in the arts as a response to the EHRD (Equality and Human Rights Duty). There was also a call for the plan to recognise the need for Irish Traveller culture to be celebrated and visible and part of the cultural programming and heritage work of Dublin City Council.

Other Issues

A wide range of other issues relating to culture were also raised by individual submissions. One important issue raised was how the Council will monitor and benchmark cultural provision – what is the appropriate amount per person, how we track losses and gains.

There was a strong sentiment in a number of submissions on the need to encourage and support the many events, museums, galleries, theatres and music venues after Covid so that they don't close. Funding for arts organisations was raised a number of times, and that the process of seeking funding and getting approval should be made clearer and easier.

Also brought up was the need for a professional network of cultural organisations using DCC buildings and/or generally funded by DCC so that they can share best practice, training, marketing and research so they meet certain professional standards.

One submission raised how use classes and zoning policy applies to flexible and “pop-up” uses for temporary cultural uses and installations and how this should be encouraged.

Three submissions brought up the provision for horse facilities in Dublin to preserve horse culture, and one sought better enforcement of the Control of Horses Act in the City.

Chief Executive's Response in Relation to Culture

Overview

The combination of Covid and the growth of Dublin as an international city has brought the issue of culture and the provision of cultural spaces to the fore at the time of the commencement of the review of the Development Plan. For these reasons, the Draft Plan will now include a dedicated chapter on culture with key policies and objectives to address the needs of this over the coming six years. This chapter will emphasise the importance of cultural activities, uses, events and spaces to the success of the City, and in particular, the City Centre. The plan will seek to define culture so that the full extent of activities that fall within it are recognised.

Night Time Culture

The submissions received on this issue brought forward a range of very positive suggestions as to how the Development Plan could positively support and promote the night-time economy for the City in a balanced and considered way. A number of ideas were outlined including a dedicated section on night time cultural activities in the plan and objectives that could be detailed to support and protect a wide range of key night time cultural activities for the benefit of the City.

Also very pertinent is the issue of protecting cultural assets within the City from loss to other uses. With a planned increase in population for Dublin and an emphasis in making living in urban environments an attractive option, it is clear that night time uses that give people the space to experience and partake in cultural activities are a critical part of the urban fabric and should be recognised, and where relevant, promoted and protected. The role of night time culture as a defined cultural component of the City will be fully considered and included in the preparation of the Draft Plan.

Cultural Quarters, Spaces and Institutions

The recognition for the work already underway by Dublin City Council and other stakeholders in supporting and growing the existing cultural quarters is welcome. Alongside this, the comments on lessons learned are important in considering how the new Draft Plan can aim to improve on what has taken place in the past. The rich cultural offer that Dublin has is evident in the submissions, and as raised earlier, the need to value this, and find space within the built environment of the City to allow our cultural endeavours to grow and enrich the lives of Dubliners and visitors alike is an important aim for the plan to address.

Again, there are a wealth of positive suggestions for objectives and policies to be included in this section of the chapter, and each will be considered when drafting the new plan. A full examination of proposed new and existing cultural quarters will inform the drafting of the Culture chapter. The Draft Plan will also look at how culture and regeneration policies overlap to ensure that there is clarity on the provision of new cultural spaces as part of regeneration plans, and also to cater for existing cultural uses within such areas which can contribute significantly to urban regeneration.

Artists Work & Living Spaces

The growth of Dublin and its success as a global city in the recent decades has had a profound impact on how space is valued within the City, and created pressure on larger volume affordable spaces that artists of all forms are able to utilise. As denser forms of development become the dominant development pattern, there is a need to preserve in the City these less commercially significant but culturally vital spaces so that the City retains and attracts artists to bring vibrancy and colour to city life. The submissions received give a clear description of the cause and the effects this has had on artists within the City. There are calls for DCC to lead a number of approaches, drawing in the positive experience of previous initiatives, in order to bring forward further new artistic workspaces. The Draft Plan will look to bring forward a number of policies and objectives to support the provision of additional artist workspaces and look to identify new opportunities to increase the provision of such, particularly as part of larger development projects.

A number of submissions looked at the impact of the cost of housing, and the precarious nature of artist funding and how this results in artists moving out of Dublin. A solution is called for that allows artists find affordable housing in the City, and the suggestion that a project of combined live/work spaces could be an asset to a community in the City. It is proposed to look at all of the suggestions and policy ideas that came forward and look, where possible to building these into the drafting of the Plan.

Theatres and Local/New Community Arts and Cultural Spaces

The proposals around community arts and cultural spaces highlighted the need for new facilities within urban villages and communities to meet the existing and future needs for Dublin. It is considered that the ideas suggested in a number of submissions provide a good direction to future interventions and it is proposed to include objectives to support these ideas. The proposal of a civic theatre will be examined as part of the preparation of the Draft, and support for additional theatre and rehearsal space will be stated in the Draft Plan. The opportunity for new spaces as part of regeneration will also be looked at and cross referenced with the regeneration sections of the Draft Plan. The views expressed in support for Libraries and their “hub” expansion is welcomed and the Draft Plan will also contain objectives supporting this model to grow across the City. The particular value of creative hubs highlighted will also be looked at and the Draft Plan will seek to include policies in supporting existing and new hub spaces. The value of cultural spaces owned and run by other stakeholders will also be recognised, including those of the City’s Universities.

Music

The provision of space within the City, both with regard to how the wider public engages through venues and concert spaces and where artists can learn, practice and record is, like for other artists, an area that is under pressure. It is critical that the plan looks at how these uses can be retained within the City and how we ensure new opportunities are created for such uses in other parts of the City, to meet growing demand. Particularly with greater numbers of people living in the City in apartments, with less access to informal spaces; rehearsal space is an essential

local service that gives children and adults alike the chance to learn and enjoy music, as a hobby or as a professional artist.

The importance of music performance is a defining characteristic of the cultural experience of Dublin City and one that needs promoting and protection. Dublin City prides itself on the diversity and success of its musicians. To nurture these talents there needs to be a range of venues across the City to give space for people to develop and grow their talents in front of a live audience. The Draft Plan will look to include policies that support this approach. The proposal for an objective for a centrally located Music Hub for the City is a worthwhile one, and this will be looked at as part of preparing the Draft Plan.

The traditional music scene also needs referencing, in recognising the important spaces for learning that the City has with great resources such as the Irish Traditional Music Archive, Píobairí Uilleann and Comhaltas as well as a number of venues and public houses across the City that host live traditional music.

Art

The submissions raised a number of very positive suggestions regarding art in the City and steps that could be taken to promote and broaden the availability and appeal of public art. The suggestion of “building” into regeneration a space for art is a very positive one and this will be included as part of regeneration policies. The importance also of broadening the appeal through the types of art provided for, particularly street art and digital art forms, present new opportunities to make the experience of the City a more engaging and attractive space for wider range of visitors and residents to come and visit. These points will be taken on board in preparing new policies and objectives on public art.

Events & Cultural Spaces

The recognition within these submissions of the success Dublin City has achieved through events and festivals including the positive impact these have for those living or visiting the City is welcomed. The importance of how public realm within the City can be used in a very positive way is also acknowledged. The draft plan will look to include policies to support the use of public spaces and where appropriate, to seek that the design of new public spaces can accommodate cultural and music events. Policies to support working with other stakeholders to promote new opportunities for cultural events and spaces will be explored and the importance of markets to the City’s cultural fabric recognised.

Inclusivity

Culture and the arts are for all and it is important that the City Development Plan outlines that cultural investment must be designed to facilitate full engagement. Whilst the plan does not have a role in arts programming or event planning, it can express support in ensuring that the public realm, the design and the locations of facilities and other interventions can contribute towards improving how and who can fully engage with culture and the arts.

Other Issues

The overarching issue of monitoring and standards is an important aspect to the drafting of policy and this will need to be looked at in the preparation of the Draft Plan. The zoning policies will be looked at in relation to cultural uses of both

permanent and temporary natures. Some of the points made are broader than the functions of the Development Plan, and are important in their own right; these will be brought to the attention of the relevant departments within Dublin City Council.

Chief Executive's Recommendations in Relation to Culture

Cultural Uses/Hubs

- Include a comprehensive definition of culture that addresses and includes many forms and is guided by national policy.
- Continue to support in the Plan the development and growth of the key cultural hubs within the City at (i) South Georgian Quarter; (ii) Parnell Square and North Inner City including Moore St and O'Connell St; (iii) Kilmainham/Dublin 8; (iv) Temple Bar, (v) Docklands and include objectives to support their growth and development.
- Include a statement of support for planned national policy of upgrading national cultural institutions; including the new collections and Learning Centre at IMMA, expansion of the Abbey to the Liffey to create an upgraded and expanded venue that contributes positively to the culture of the City and other projects proposed during the lifetime of the Development Plan.
- Promote the expansion of cultural uses within existing spaces, particularly those in public ownership.
- Highlight the challenges faced with regeneration that can result in development pressure on cultural uses located in older industrial estates and include policies and objectives that seek to ensure new developments incorporate cultural uses as part of new mixed use communities.
- Give support to well established creative hubs within the City and seek creation of additional spaces where the opportunity arises.

Night Time Economy

- Include specific policies and objectives regarding night-time cultural uses that support the sector and seek to balance this use with the need to support residential development within the Inner City.
- Include objectives supporting increased cultural activities in the evening, and to encourage greater engagement by young people in cultural activities.

Cultural Spaces/Libraries

- Examine opportunities to increase the provision of new cultural spaces and artist studios as part of regeneration areas and large scale redevelopment proposals.

- Include policies that seek the protection of a defined list of cultural spaces within the City, and require “like for like” replacement where appropriate.
- Include policies supporting the role of DCC in acquiring buildings of merit within communities that can become important arts and cultural spaces; and giving a new purpose to local buildings with heritage value.
- Support the expansion and growth of libraries as key community and cultural assets within communities; including in providing key spaces for communities to use for cultural and arts events, music, classes, history and experiences.
- Include policies to support the development of arts and cultural spaces in urban villages across the City and to identify areas where there is a current need.
- Include a policy to support a feasibility model and pilot project for provision of artist live-work space during the lifetime of the Development Plan.

Irish Language

- Include specific policies regarding supporting Gaeilge as part of our identity and as a living language within the community. Support traditional Irish culture including music and sports and to look to support key language and cultural investment projects. Explore options for promoting Irish language and culture in general, through policy and actions.

Music/Audio Visual Sectors

- Include policies and objectives regarding music as a key cultural asset of Dublin City; and include support for development of new facilities to support growth and opportunity for all, including a statement of support for a future flagship facility in the City.
- Give recognition of the importance of the audio-visual sector, both as economic asset in production and as a cultural experience, supporting cinema provision, education and local arts projects and facilities to engage with the media. This includes supporting production within the City, including protecting key historic set pieces and the use of the public realm for production work; supporting the emergence of audio-visual hubs within D8 and D2, and encouraging the provision of community spaces such as community radio studios and recording spaces across the City suburbs.

Inclusivity

- Include a series of policies to support greater inclusivity as part of the cultural experience and to support adaptation to address shortcomings. Include objectives to support the promotion of increased cultural engagement for minority groups, people with disabilities, young people, socially excluded, members of the Travelling community and LGBTQ+ community members.

Public Realm

- Encourage greater use of the public realm for cultural events; to make the City Centre more attractive to those with young families, and to seek provision of new public spaces for outdoor performance that are designed and fitted to host a range of events.
- Include a policy to seek that all significant scale public, joint and private projects within the City should make use of the Percent for Arts Scheme; particularly those which will provide new public realm.

Theme 10: Sustainable Environmental Infrastructure and Flood Risk

Submission Number(s):

S-00414, S-00726, S-00727, S-00331, S-00401, S-00106, S-00231, S-00257, S-00048, S-00305, S-00135, S-00147, S-00150, S-00211, S-00382, S-00255, S-00417, S-00023, S-00198, S-00243, S-00262, S-00290, S-00413, S-00567, S-00559, S-00728, S-00080, S-00668, S-00656, S-00654, S-00644, S-00003, S-00079, S-00115, S-00033, S-00070, S-00109, S-00146, S-00001, S-00129, S-00130, S-00199, S-00206, S-00222, S-00240, S-00264, S-00265, S-00273, S-00376, S-00390, S-00399, S-00470, S-00490, S-00491, S-00501, S-00508, S-00510, S-00520, S-00534, S-00539, S-00562, S-00581, S-00605, S-00615, S-00015, S-00151, S-00160, S-00178, S-00185, S-00202, S-00218, S-00233, S-00250, S-00254, S-00268, S-00328, S-00332, S-00351, S-00361, S-00368, S-00385, S-00408, S-00462, S-00472, S-00497, S-00522, S-00542, S-00582, S-00606, S-00245, S-00511, S-00666, S-00454, S-00664, S-00663, S-00577, S-00651, S-00645, S-00152, S-00447, S-00637, S-00729, S-00047, S-00051, S-00709, S-00210, S-00183, S-00203, S-00272, S-00277, S-00667, S-00388, S-00428, S-00694, S-00187, S-00710, S-00523, S-00220, S-00612, S-00636, S-00327, S-00568, S-00326, S-00136, S-00377, S-00442, S-00580, S-00610, S-00275, S-00529, S-00659, S-00673, S-00669, S-00631, S-00445, S-00538, S-00280, S-00717, S-00297, S-00692, S-00167, S-00512, S-00153, S-00607, S-00743, S-00547, S-00617, S-00746, S-00473, S-00007, S-00108

Summary of Issues

Flood Risk

A significant number of submissions focussed on the issue of Dublin's vulnerability to flood risks arising from climate change. They sought proactive strategic flood risk management through identification/ protection of floodplains from development, the roll-out of evidence-based flood risk monitoring/ reporting and the deployment of additional flood defences to ensure coastal protection, with suggestions ranging from estuarine/ port barriers and eco-sea levees, to sea wall reinforcements to manage sea level rise. A number of submissions called for flood defence measures to ensure that existing and proposed cycle tracks and walkways were future-proofed against predicted sea-level increases.

Submissions raised the need for improved urban flood management and the importance of directing flood flows along routes where the risk to property and health/ safety is minimal and can be managed. Some submissions sought the exploration of more innovative nature-based flood risk management measures and investment in green infrastructure solutions for mitigating/ protecting against flood risk. Ideas put forward include the rewilding of river banks, the creation of substantial riparian zones along the City's waterways and the integration of the 'green factor approach', with one submission calling for the creation of community-managed wetlands along waterways. The interaction between new flood measures and biodiversity was also referenced as was culvert restoration and opening up of underground/ partially underground rivers.

The submission from the Office of Public Works (OPW) requested that the Development Plan give a commitment to abide by the Section 28 Guidelines on Flood Risk, include a sequential/ precautionary approach to managing flood risk, in addition to asking that specific consideration be given to Flood Risk Management Plans and Flood Maps, Climate Change Impacts, Coastal Change, Arterial Drainage Schemes and Drainage Districts, Land Protected by Agricultural Embankments, Flood Impacts on Other Areas and Natural Water Retention Measures. Related thematic submissions pointed to the need for a comprehensive flood risk assessment to be carried out in order to provide adequate mitigation measures, and called for flood measures in areas to mitigate against high water table, particularly where the use of basement development is prevalent, and for no basements to be permitted in flood zones.

Community flood resilience emerged as an important theme with specific calls for the protection of the City's coastline, coastal and river villages/ communities from all types of flooding arising from climate change and for new/ enhanced coastal flood defences in areas such as Sandymount, Irishtown, Clontarf and Ringsend. The 'risk-reward balance' was highlighted with submissions emphasising the importance of striking a balance between delivering flood protection and safeguarding coastal visual/ residential amenity by avoiding intrusive protection measures and maintaining access to waterways. Flood insurance issues were also raised in a number of submissions.

The submission made by Dublin Port Company stated that climate change and flooding are a key considerations for the organisation and that detailed studies are being carried out on the impacts of sea level rises on the Great South Wall and on the North Bull Wall in order to identify what works will be required to protect the Port in the future.

Coastal Management

A small number of submissions called for the City to make the most of its coastal location and potential. It was suggested that this could be achieved by the Council working with stakeholders to clean-up the condition/ operation of the Poolbeg Peninsula and to deal with issues such as obsolete ESB infrastructure, the condition of the Irish Water waste facility and the decontamination of Port Authority lands. .

In the context of climate change-linked coastal flooding and more severe weather events, a small number of individual submissions focussed on the management and protection of the City's coastline through the development of coastal defences and related infrastructure, and the need to harness our coastal potential in areas such as Sandymount. The Geological Survey of Ireland draws the Council's attention to the availability of their Coastal Vulnerability Index and the existence of their Marina and Coastal Unit.

Wastewater / Foul Water

Irish Water's submission committed to continuing to engage with the City Council on relevant plans and projects during the Development Plan process and provided details of specific text/ policies/ objectives that it would like included in the Draft Plan. Their submission highlighted relevant national and regional policy on water services,

in addition to drawing the Council's attention to the Irish Water Investment Plan 2020-2024, Water Services Strategic Plan, National Resources Plan and River Basin Management Plan. They set out the nature of current issues with waste water network capacity and provided an overview of planned/ ongoing strategic water service projects relevant to Dublin City including the Water Supply Project for the Eastern and Midlands area, the Ringsend WWTP upgrade, the Greater Dublin Drainage Project, and ongoing Sewer Rehabilitation Programmes/ Capacity Reinforcement/ Drainage Action Plans. The submission also noted Irish Water's willingness to work with the Council to mitigate climate change impacts and stated that they are preparing a strategy to address the impacts of climate change by adapting their water service assets to be resilient to climate change/ less carbon intensive.

A number of submissions related to the theme of foul water and wastewater. Many of these highlighted concerns with the City's strategic waste water/ sewage treatment infrastructure and specifically the operational capacity of the Ringsend Waste Water Treatment Plant (WWTP). The risk of pollution/ sewage overflows and the impact on water quality in Dublin Bay/ the Strand were also noted. Submissions highlighted that there is a need to plan for improvements/ upgrades to this infrastructure in order to deal with these issues and for further engagement with Irish Water on this matter. The need to separate foul and surface water sewers to relieve pressure on the City's wastewater treatment system and improve pollution control practices was also referenced. Submissions also raised some localised wastewater management issues in areas such as Inchicore and requested that strategic water supply and waste water infrastructure be considered in all new developments.

A small number of submissions concerned partnership working between the Council and strategic infrastructure providers such as Irish Water or requested that the Council consult with Irish Water in respect to their plans, projects and infrastructure funding.

Water Supply / Water Conservation

The Irish Water submission recognised the need for investment in a new water supply source/ water infrastructure and draws the Council's attention to the ongoing Water Supply Project for the Eastern and Midlands, while the GSI in their submission draw the Council's attention to their Groundwater Programme.

The safety and quality of the City's public water supply is a common theme throughout the submissions. A small number of submissions suggested public drinking water supply could be enhanced through the roll out of public water fountains. Poor water pressure is also raised as an issue and demands are made to progress water pipe renewal/ repair works in order to reduce water leakage.

Quite a number of submissions focussed on water conservation measures as a means of efficiently managing our water resources and preserving adequate water supply in the context of climate change. There was general consensus that rainwater harvesting and reuse should be actively encouraged by the Council, particularly in the case of new developments, in retro-fits and in public buildings, with the potential for community based rainwater harvesting systems also raised. Measures suggested include promotional campaigns to encourage water conservation, encouraging/

incentivising rainwater harvesting using water butts, water efficiency specifications for new buildings and the development of water conservation programmes for businesses. A small number of submissions called for demand-side water conservation measures such as the introduction of water charges.

Water Quality / Watercourse Management

The submission from the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media submission focused on the importance of maintaining high water quality/ ecological status in the City's waterbodies. Suggested measures to achieve this objective include providing buffer zones for flood plains, discouraging the culverting of watercourses and reopening those previously culverted, the removal of historic infilling along watercourses and, introducing a riparian zone/ setback policy based on the Inland Fisheries Ireland Document 'Planning for Watercourses in the Urban Environment' as part of the Draft Plan.

The appropriate management of watercourses was also raised as an issue in a number of individual submissions. Many submissions were also made on the theme of water quality management and raised the requirement for monitoring, protection and improvement of water quality in Dublin Bay, in the Dodder, Liffey, Poddle and Camac Rivers and in the City's canals. One submission received also requested the removal of defunct manmade weirs and barriers on the City's watercourses.

Surface Water Management / Sustainable Urban Drainage Systems

A significant number of submissions related to the topic of surface-water management and surface water network capacity, and noted the potential link between surface-water run-off overflows and pollution in Dublin Bay/ the protection and management of Dublin's water resources.

Many submissions highlighted the link between increases in hard surfacing across the City, pressure on wastewater infrastructure capacity and the pollution of watercourses. Submissions also drew attention to the problem of surface water run-off and flooding and called for replacement of hard surfaces with permeable ones, for restrictions on the paving over of areas such as driveways and gardens, and for the implementation of SuDS principles in all new developments.

Some of the submissions called for the adoption of a more nature-based approach to the management of surface water run-off quality and quantity in order to remedy local surface water drainage, flooding and pollution issues. Options such as sustainable urban drainage systems (SuDS), open spaces being used for stormwater infiltration, green infrastructure/ surfaces covered by vegetation/ green roofs, and greater controls on or incentives to stop the paving of gardens/ driveways/ conversion of greenspaces to impermeable hard surfaces were some of the other proposals put forward. One submission received supports the Council's existing SuDS policy and calls for a strengthening of this policy in the Draft Plan. A small number of submissions received raised area-specific or local operational surface water/ drainage matters.

Waste Management

Waste/ litter management emerged as a significant theme in the submissions made under the theme of Sustainable Environmental Infrastructure. A large number of these stated that the provision of more sustainable waste management infrastructure should be a priority for the Council in line with circular economy principles and in order to reduce landfilling/ encourage greater household waste reduction, limitation and segregation.

The submissions also made a number of suggestions as to how the City's waste management and recycling infrastructure could be improved. Ideas put forward included the roll-out of localised civic amenity/ bring centres and the provision of more bottle/ clothes banks near where people live in line with the principles of the 15 minute city. Additional on-street recycling/ waste bins and greater supports for businesses to reduce their commercial waste generation were also suggested as potential solutions.

Many submissions focused on community access to waste management services. These highlighted issues such as recycling ability being car dependant and the lack of recycling drop-off points. They sought to improve overall accessibility through a range of initiatives including the provision of public litter bins at strategic locations, mobile bring centres, the extension of recycling centre opening hours, greater provision of community composting, the reinstatement of a regular bulky waste collection service, and further roll out of on-street point-of-use multi-purpose waste segregating recycling bins such as the sharedbinsBETA project. One submission specifically called for better recycling and composting facilities in public housing developments.

The need for community composing facilities emerged as a clear theme with submissions calling for the identification of suitable sites on public lands throughout the City on which to provide community composters and for the Council to fund the expansion of the City's existing network in line with the 15-minute city concept.

Some submissions drew on international examples/ best practice in waste management to substantiate their ideas for innovative waste management solutions. Proposals included the installation of underground waste receptacles/ deep hole waste collection points in areas of the City where there is limited space for on-street waste marshalling (i.e. terraced housing) and the repurposing of underutilised on-street car parking for residential waste management.

Many submissions focussed on the importance of promoting waste education to ensure the public are made aware of the need to segregate waste and recycle on a day-to-day basis.

Operational waste management issues accounted for a substantial proportion of the submissions made. These called on the Council to exercise greater oversight in relation to refuse collection/ recycling, to re-municipalise waste services in the City or to reinstate a single public waste collection operator, to increase enforcement of food waste regulations, to install larger bin containers in areas where refuse is collected in black bins, to tackle dog fouling, to empty bins more regularly and to roll out additional auto-compacting bins. Many of these submissions also raised area-

specific issues in relation to waste collection operations, waste enforcement and illegal dumping.

Litter Management

A small number of submissions called for the improved management of litter within the city and focussed mainly on litter collection, segregation, enforcement and public education/ awareness issues. Effective plans for litter management were also referenced as was a clear strategy for dealing with litter management and illegal dumping in the city.

Air Quality

A number of submissions raised the issue of poor air quality in the city arising from factors such as excessive car use, traffic emissions and solid fuel burning, and specifically identified local air pollution hotspots. Many called for an evidence-based approach to air quality/ pollution management across the city through the use of real-time air pollution monitoring and mapping. Other suggestions made for improving air quality included increasing the number of air quality monitors in congestion black spots, the installation of monitoring stations as part of major new developments, setting ratios for greening/ biodiversity to offset poor air quality, banning the burning of solid/ smoky fuels, planting additional trees, targeted emissions/ ventilation management for restaurants, encouraging roll-out of electric vehicles, and measures to reduce engine idling outside of schools/ low carbon zones around schools. Submissions also called on the Development Plan to support national programmes of air quality monitoring, promote an air quality index for health, and to develop local air quality management plans.

Noise Pollution

The importance of managing noise and avoiding noise pollution was raised in a small number of submissions. Hotspots of noise pollution were identified across the city. A range of noise management solutions were suggested including the use of noise pollution mapping, traffic controls, improved roadway maintenance, the use of noise mitigating paving and the roll-out of quiet zones. One submission requested that the Council give due consideration to noise sensitive uses adjacent to Z7 (industrial) zoned land and ensure sufficient acoustic insulation on adjacent developments.

The submission made by Dublin Airport Authority welcomed the inclusion of noise management as an area that will be addressed in the Development Plan and draws the Council's attention to a review of noise zones surrounding Dublin Airport recently undertaken by Fingal County Council which should inform noise management policy.

Street Lighting

The Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media requested the inclusion of policies on street lighting, development lighting and light pollution in the Draft Plan. Their submission made specific comments in respect to current policy in the use of LED bulbs in external lighting. It also requested that the design of any lighting proposals take account of the possible presence of light sensitive bat species.

A small number of submissions were made on the theme of public lighting/ light pollution and primarily concerned the design of public street lamps, street lighting standards/safety, light pollution issues and lighting in public buildings. These submissions call for upgraded lighting/ LED lighting as standard on public buildings, for a design framework for public/ external lighting, for the deployment of smart lighting, for old street lamps be replaced with warm white coloured lights, and for appropriate differences in day/ night light intensities to protect biodiversity.

Utilities / Ducting

The ESB noted the importance of a smarter and more sustainable electricity network. Their submission requested that the Development Plan include specific policies and objectives that support investment in/ delivery of infrastructure to meet future energy needs and state that the following strategic issues relevant to the electricity sector should inform the preparation of the Draft Plan: electricity transmission, distribution and generation; the expansion and improvement in telecommunications infrastructure to improve virtual connectivity; and, the roll-out of new EV infrastructure and hydrogen projects in line with the move to a more circular energy system. They also specifically highlight the importance of the Poolbeg Peninsula to the national grid system and its future role in accommodating infrastructure/ assets to support the decarbonisation of the electricity sector.

The submission from EirGrid called for the Development Plan to acknowledge the importance of the electricity transmission grid to supporting society and economy and sought clear policy support for the safe, secure and reliable supply of electricity in order to respond to Government policy and support the implementation of its Grid Development Strategy which underpins national targets on electricity generation, climate change and energy security.

One submission called on the Development Plan to support the objectives of the RSES regarding facilitating linkages of renewable energy proposals to the electricity and gas transmission grid. Other submissions have differing viewpoints on how the Development Plan should address the City's utilities, with some calling on the Council to support the expansion of gas/ grid utilities infrastructure while others request that this expansion be halted in order to support the phasing out of fossil fuels. A small number of submissions were made in respect to the role of Poolbeg Peninsula as an infrastructure hub/ logistics and power centre for the City. One submission addressed the need for better co-ordination when installing services and ducting, while another requested that the City's obsolete utilities infrastructure be reviewed.

Digital Connection / Telecommunications

A number of submissions highlighted the role of good quality broadband to supporting employment and education and the importance of the Development Plan addressing the need for high quality/ affordable/ accessible digital connection facilitated through innovative delivery mechanisms. One submission called for the provision of additional data infrastructure in order to facilitate the ongoing trend towards more working from home. One submission concerned smart technology in the form of the internet of things (IoT) and connected technologies such as smart

bins. Another submission sought the development of ‘digital spaces’ and screens throughout the City.

Waste Energy / District Heating

Submissions made in respect to waste energy focussed on the importance of developing systems and infrastructures to ensure its sustainable reuse. Methane capture at landfills and waste heat from data centres are given as examples of waste energy sources that could be utilised/ reused to generate heat and power by feeding district heating systems which could form part of district energy zones – all in line with the principles of the circular economy.

Alternative Energy / Renewable Energy Generation

A number of submissions requested that the Development Plan support new energy reduction/ reuse/ generation technologies in order to provide more secure/ low carbon forms of energy. It is also requested that there is support for the increased use of renewable/ alternative (heat/power) energy generation/ sources and related infrastructure as part of new developments and as part of the retrofit of existing buildings where possible. Ideas put forward include public buildings generating their own energy, harnessing excess energy from data centres for district heating, co-generation and district energy, wind turbines/ off-shore wind, solar, hydropower, carbon capture technologies, methane capture at landfills, heat pumps and increased energy efficiency. Submissions also called for the Development Plan to support community ownership of renewable energy and large-small scale projects (businesses/ homes) that could contribute excess energy to the local or national grid.

Chief Executive's Response in Relation to Sustainable Environmental Infrastructure and Flood Risk

Flood Risk

It is important to clarify at the outset that some of the issues raised fall within the remit of other National Agencies e.g. Irish Water is responsible for the capital and investment decisions regarding that county’s water infrastructure on a national basis. DCC will work closely with IW to ensure the timely delivery of water/sewage infrastructure to achieve the core strategy.

The Strategic Flood Risk Assessment for the Development Plan will be prepared based on the methodology as set out in the Section 28 Guidelines and due consideration will be given to climate change impacts and the factors specified by the Office of Public Works (OPW) in their submission. The SFRA will be aligned with the SEA process. The Council will continue to work proactively with relevant authorities, such as the OPW, on the identification of flood risk and development of additional flood risk management measures where necessary.

The flood risk to Dublin Port posed by sea level rise is noted and the Council will work with Dublin Port Company to establish what works are required to protect the port into the future. The City Council recognises that citizens are concerned about Dublin’s vulnerability to flood risk arising from climate change impacts. In response, it is recommended that the pre-draft Development Plan supports a more multi-

disciplinary and nature-based approach to flood risk management in the forthcoming Plan and will explore opportunities for community flood resilience.

Coastal Management

The national policy context for coastal zone management is rapidly evolving and the City Council awaits the publication of National Marine Planning Framework and related planning guidance. The City Council recognises the coast as an important resource for the City and will promote its sustainable development. The DCC Climate Action Plan 2019 identifies the preparation of a *Coastal Zone Flood Management Plan* for Dublin Bay as an action of that Plan. This plan will include for anticipated increased wave heights due to climate change as well as likely rises in sea level. The next Plan will support and promote development in suitable coastal locations and coastal and environmental protection in the Draft Plan.

Wastewater / Foul Water

The City Council are committed to working with Irish Water in respect to strategic water service projects relevant to Dublin City and will continue to support efforts to improve the operational capacity of their waste water network and sewage treatment infrastructure in line with environmental and climate resilience requirements. It is recommended policies and objectives to this effect are included in the Draft Plan.

Water Supply / Water Conservation

The benefits of making the City's water supply more secure/ resilient to climate change risks are recognised. Irish Water's Water Supply Project for the Eastern and Midlands Region is supported. At a city wide level, it is recommended that greater water conservation is encouraged and that exploration of alternative sources such as rainwater harvesting is promoted as part of the Draft Plan.

Water Quality / Watercourse Management

The City Council recognises the need to maintain high water quality and ecological status in the City's waterbodies. Under the Water Framework Directive, the River Basin Management Plans identify pressures on water quality and set out a programme of measures and actions to improve water quality in our rivers, lakes, estuaries and coastal waters. The City Council will continue to support initiatives to improve water quality and to achieve 'good ecological' status. In this regard, the City Council supports the increased use of nature-based management measures and the more sympathetic treatment of our City's watercourses, where feasible. As outlined above, the Council is committed to improving the quality of waterbodies overall at the City level but also at the level of individual waterbodies through more targeted interventions in order to deliver multifunctional benefits. It is recommended that appropriate policies and objectives in this regard will be set out in the Draft Plan.

Surface Water Management / Sustainable Urban Drainage Systems

The protection and management of Dublin City's water resources is linked to the quality and quantity of surface water run-off across the City. The City Council welcome and support the use of a nature-based approach to the management of surface water and it is recommended that strengthened SuDS policy guidance in the Draft Plan is provided. It is recognised that significant new developments in particular will need to demonstrate that sustainable surface water management has been comprehensively considered at design and planning stages. Addressing strategic

surface-water management is also key and it is envisaged that this will be delivered through further identification of Strategic Development Regeneration Areas in the Plan and the formulation of appropriate guiding principles. Local and area-specific surface water/ drainage matters are operational issues which cannot be directly addressed in the Development Plan.

Waste Management

Promoting and delivering more sustainable forms of waste management in the City in line with circular economy and 15-minute city principles will be central to the overall approach of the Draft Plan. The importance of promoting waste education to ensure the public are made aware of the need to segregate waste and recycle on a day-to-day basis can be highlighted in the Plan. Waste collection, enforcement and illegal dumping are operational issues and as a result will not be addressed directly in the Development Plan.

Litter Management

The Dublin City Council Litter Management Plan 2020-2022 focuses on the importance of partnership working and seeks to engage citizens and local businesses in strategies to deal with litter-related issues. In response, it is recommended the Draft Development Plan seeks to proactively address litter awareness/ education through appropriate policy.

Waste Energy / District Heating

The sustainable reuse of waste/ utilisation of waste energy and the need to develop systems and infrastructures to facilitate this objective were issues raised by numerous submissions. The City Council acknowledge the potential of district heating as a sustainable system to connect sources of waste heat/ power supply with areas of demand and recognise the potential to expand the City's district heating network in the future where feasible and as opportunities arise. This matter will be explored further and promoted in the Draft Plan.

Air Quality

As Dublin City grows and consolidates, higher levels of vehicular movement and construction activity will intensify the importance of maintaining air quality and to managing the negative environmental and public health impacts of air pollution at source. The City Council will continue to work with the Environmental Protection Agency and other agencies to monitor the City's air quality and will also work with adjoining local authorities to prepare an Air Quality Management Plan in accordance with the forthcoming national Clean Air Strategy.

Noise Pollution

As outlined above, as Dublin City grows and consolidates, there will be an increasing requirement to proactively manage sound levels and sources of urban noise pollution in order to avoid adverse impacts on health, quality of life, the environment and wildlife. It is intended that the Development Plan includes policies to reduce and mitigate the adverse effects of noise pollution associated with densification, the construction/ operation of development and the operation of transport infrastructure, and by identifying, protecting and creating areas of low sound levels in accordance with Dublin City Council's Noise Action Plan 2018-2023.

Street Lighting

The City Council recently published a Vision Statement for public lighting which, together with an ongoing municipal LED Improvement Scheme, seeks to provide high quality, smart and energy efficient public lighting that enhances peoples' experience of the City and their sense of place, civic pride and safety. Obtrusive light is an ongoing concern. It is recommended that the CDP supports through appropriate policy lighting installations designed to minimise light pollution/ unwanted environmental effects while maximising the light reaching the public realm.

Utilities / Ducting

The submissions made by the ESB and Eirgrid in respect to utilities infrastructure are noted and it is recommended their respective requirements inform the Draft Plan. It is clear that a key part of the effort to tackle the climate emergency is to support a reduction in the carbon emissions arising from the energy utilities sector. In this regard, it is recommended the City Council will support measures to adapt and diversify the national energy grid to phase out fossil fuels in favour of embracing a more diverse range of low, zero-carbon and renewable energy sources/ infrastructures. The Council also notes the importance of the Poolbeg Peninsula as a strategic hub for electricity generation and the transmission/ distribution network and it is considered that this function is facilitated long term.

Digital Connection / Telecommunications

Communications/ digital connectivity infrastructure is vitally important to supporting growth, the development of the knowledge economy and contemporary virtual home working and education arrangements. The City Council recognise the importance of this infrastructure being delivered in a strategic way to enable better coordination thereby avoiding inefficient, ad-hoc and inequitable provision. It is recommended that the Draft Plan will include appropriate policies and objectives to support the telecommunication sector and facilitate the roll out of the necessary infrastructure.

Alternative Energy / Renewable Energy Generation

It is clear that a key part of our effort to tackle climate change is to switch to alternative energy sources and to make our current use of energy more efficient through the greater use of renewables. In this regard, the move to more secure/ low carbon forms of energy such as renewable wind and solar energy generated either by large facilities outside the City's boundaries or by micro-renewable technologies installed in buildings in the City itself is strongly supported and is recommended. The Draft Plan will include proactive policies to support the renewable sector.

Chief Executive's Recommendations in Relation to Sustainable Environmental Infrastructure and Flood Risk

General

- Ensure that the growth and development of the City is integrated with appropriate provision of sustainable environmental infrastructure which contributes to wider climate action/ environmental goals and targets.
- Promote a high standard in the delivery and on-going maintenance of infrastructure and utilities to enhance the built environment.

Flood Risk

- Prepare an updated Strategic Flood Risk Assessment for the City and continue to work with relevant authorities on the identification and development of additional flood protection measures where necessary, to strengthen existing policies in relation to SFRA.
- Develop a multi-disciplinary and nature-based approach to flood risk management which explores opportunities for community flood resilience.
- Consider including greater policy guidance on coastal zone management subject to forthcoming national guidance.

Infrastructure

- Liaise with national infrastructure providers to co-ordinate, inform and influence the timely provision of infrastructure for the sustainable development of the City.
- Support Irish Waters strategic water service projects and infrastructure improvements, and engage with them to facilitate projects that deliver the water services infrastructure necessary to support Dublin City's settlement strategy, sustainable growth and mitigation and adaptation to climate change in line with national and regional policy.

Water Quality, Water Conservation, Surface Water Management

- Promote opportunities for water conservation as part of new and retrofitted developments and encourage the consideration of alternative water sources.
- Support initiatives to improve water quality and to achieve 'good ecological' status in compliance with the Water Framework Directive and associated River Basin Management Plans in the City, particularly those which employ nature-based management measures, and explore opportunities for targeted watercourse improvement interventions which are designed to deliver a wider range of environmental benefits.
- Require significant new developments to address the issue of strategic surface water management and for all developments to address run-off using sustainable urban drainage and other predominately nature-based solutions to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change.
- Ensure the objectives of the East Midlands Region Waste Management Plan 2015-2021, or such plans as may be updated, are incorporated where relevant into the Development Plan.

Waste Management

- Promote a more sustainable and localised approach to litter and waste management, having regard to the 15 minute city approach.
- Support the principle of the circular economy.
- Strengthen existing waste management policies and promote education and awareness on all issues associated with waste management, both at industry and community level. This will include the promotion of waste reduction by encouraging reuse, re-cycling and recovery of waste within the City.
- Ensure new development, in particular higher density residential development, provides adequate space for waste management and recycling.

Energy

- Consider the inclusion of policies/ objectives in relation to the utilisation of waste heat from sources/ large energy emitters such as data centres within the Plan.
- Strengthen and expand policy support for the roll-out of district energy zones which utilise district heating.
- Support measures to adapt/ diversify the national energy grid to phase out fossil fuels in favour of embracing a more diverse range of low, zero-carbon and renewable energy sources and energy utility infrastructures.
- Recognise the role of the Poolbeg Peninsula as a strategic hub for electricity generation and distribution together with WWTP and waste to energy production.
- Support the development of alternative energy sources and innovative energy efficient technologies such as wind and solar power.

Air Quality, Noise, Light, Utilities

- Support the preparation of an evidence-based Air Quality Management Plan for the Dublin area.
- Support the proactive management of noise by strengthening existing policies in relation to the strategic management, monitoring and mitigation of noise pollution and support Dublin City Council's Noise Action Plan 2018-2023 which is due for review during the lifetime of the Plan.
- Require new external lighting design to minimise light pollution impacts and maximise environmental efficiency.

- Continue to support and facilitate energy utility providers in their efforts to reinforce, strengthen and safeguard existing utility infrastructure and networks to serve the existing and future needs of the City.
- Facilitate the coordinated provision of telecommunications/ digital connectivity infrastructure at appropriate locations throughout the City and extension of telecommunications infrastructure including broadband connectivity in the City as a means of improving economic competitiveness and enabling more flexible work practices.

Other Issues

Submission Number(s):

S-00017, S-00100, S-00112, S-00727, S-00258, S-00319, S-00204, S-00363, S-00121, S-00291, S-00155, S-00175, S-00129, S-00697, S-00705, S-00066, S-00093, S-00131, S-00135, S-00147, S-00150, S-00163, S-00168, S-00193, S-00211, S-00382, S-00329, S-00335, S-00339, S-00354, S-00412, S-00417, S-00247, S-00455, S-00376, S-00534, S-00002, S-00041, S-00480, S-00024, S-00025, S-00403, S-00404, S-00426, S-00629, S-00567, S-00562, S-00087, S-00559, S-00469, S-00096, S-00125, S-00519, S-00330, S-00472, S-00552, S-00740, S-00020, S-00058, S-00053, S-00054, S-00689, S-00672, S-00671, S-00670, S-00668, S-00662, S-00656, S-00653, S-00641, S-00644, S-00393, S-00012, S-00022, S-00029, S-00033, S-00080, S-00099, S-00108, S-00111, S-00113, S-00039, S-00071, S-00072, S-00079, S-00083, S-00106, S-00114, S-00130, S-00134, S-00136, S-00170, S-00194, S-00195, S-00207, S-00210, S-00225, S-00229, S-00231, S-00240, S-00242, S-00264, S-00268, S-00272, S-00277, S-00280, S-00306, S-00325, S-00336, S-00384, S-00391, S-00394, S-00397, S-00399, S-00414, S-00420, S-00424, S-00451, S-00462, S-00508, S-00522, S-00523, S-00524, S-00526, S-00553, S-00558, S-00569, S-00575, S-00587, S-00589, S-00606, S-00615, S-00617, S-00628, S-00675, S-00162, S-00167, S-00169, S-00173, S-00178, S-00196, S-00213, S-00233, S-00238, S-00257, S-00270, S-00275, S-00284, S-00312, S-00324, S-00327, S-00331, S-00368, S-00388, S-00398, S-00428, S-00466, S-00479, S-00485, S-00512, S-00517, S-00518, S-00532, S-00544, S-00546, S-00550, S-00568, S-00580, S-00582, S-00604, S-00607, S-00612, S-00616, S-00627, S-00636, S-00639, S-00640, S-00245, S-00666, S-00614, S-00664, S-00663, S-00652, S-00651, S-00650, S-00645, S-00525, S-00407, S-00152, S-00427, S-00447, S-00456, S-00744, S-00637, S-00626, S-00709, S-00726, S-00690, S-00648, S-00647, S-00657, S-00118, S-00124, S-00137, S-00146, S-00183, S-00191, S-00203, S-00696, S-00165, S-00350, S-00206, S-00679, S-00712, S-00741, S-00220, S-00293, S-00326, S-00444, S-00349, S-00415, S-00500, S-00610, S-00623, S-00695, S-00221, S-00560, S-00157, S-00748, S-00164, S-00249, S-00529, S-00658, S-00659, S-00660, S-00732, S-00674, S-00673, S-00669, S-00665, S-00631, S-00465, S-00433, S-00283, S-00303, S-00308, S-00082, S-00718, S-00302, S-00369, S-00680, S-00574, S-00297, S-00374, S-00692, S-00735, S-00736, S-00737, S-00742, S-00153, S-00746, S-00473, S-00598, S-00752

Summary of Other Issues

Introduction

This section captures issues not associated directly with the ten strategic issues identified in the Pre Draft Consultation Strategic Issues Paper. The issues have been separated out under the four sub-sections: development management/standards, zoning, miscellaneous and outside the scope of the Development Plan.

It is noted that a number of submissions that were made through the Development Plan submission portal utilised the 'Other Issues' theme whereas, the submission in fact, related to one of the other 10 Strategic Issue Themes. Responses to such submissions, may, therefore, be addressed elsewhere in this report and can be

located by submission number. It is also noted that a number of submissions related to specific areas of the City. The City Plan is a strategic plan for the City as a whole and does not typically relate to site specific or localised issues. Where relevant, such submissions, are referenced and responded to under the 10 main themes.

Development Management/Standards

A number of submissions called for more flexible development standards to allow for greater densification of the suburbs and in particular, that plot ratio and site coverage standards need to be considered in light of new national guidelines.

With regard to building height, a number of submissions highlighted that prescriptive height thresholds should be avoided and that a criteria based approach, to enable key locations within the City to provide more sustainable forms of development, should be considered. It was noted in one submission that criteria for assessing high buildings must address potential aviation safety impacts, and another suggested that better design guidance is required for set-back storeys and only set-backs of an exemplary design character and architectural resolution should be permitted.

Submissions also requested amendments to private and communal open space requirements to reflect those set out in the Apartment Guidelines (2018) and that other criteria such as separation distances be revisited to allow for more compact growth. Other submissions noted concerns regarding current apartment standards in terms of criteria such as floor areas, room dimensions, storage etc. and suggest that these should be amended/increased to make apartment living more attractive.

Concerns were raised in some submissions regarding the proliferation of street furniture including advertising signs, general signage, lamp posts, bollards, traffic boxes, traffic lights, parking meters etc. and that it creates a barrier to people with a disability and can detract from the built environment. It is requested that the plan adopts a policy to remove redundant street furniture and consolidate existing street furniture.

The issue of climate change was also of importance with a number of submissions requiring clearer development management policies regarding the reuse of existing buildings rather than demolition.

Some submissions requested greater clarity regarding standards for the design and development of driveways to allow for the development of electric charging. Sustainable mobility was also a clear theme in a number of submissions with requests relating to cycle parking. It was noted by some, that the developments should cater for a wide range of different types of cycle parking (e.g. cargo and family bikes) and that covered and secure parking is required which is convenient to access. Others called for better rationalisation of bicycle parking with standards based on spaces per unit rather than bedspace. A number of submissions also requested a reduction in car parking standards for residential development.

With regard to more conventional housing, one submission called for a review of the standards relating to attic conversions and dormer design. Some submissions requested a more flexible approach to the subdivision of housing.

The matter of noise pollution was also raised in some submissions with calls for enhanced development management standards regarding sound proofing. Some submissions also commented in a general sense regarding the development management process. Issues raised include:

- That energy assessments of developments should be sought including consideration of embodied energy and emissions.
- All transport, public realm and housing plans should be subject to an equality audit.
- That planning compliance drawings in relation to Protected Structures and ACA's should be reviewed and signed off by Conservation personnel.
- Public planning records / information should be easily accessible and up to date.

Zoning

One submission suggests that the Development Plan should provide different types of residential zonings to distinguish between different accommodation typologies including aparthotels, co-living and student accommodation.

It is also requested that the Z8 zoning category be reviewed to promote greater mixed use development and liveability, particularly in the South Georgian Core. There was one detailed submission from the GAA seeking the review of the Z9 zoning objective to facilitate development that would enhance/upgrade club facilities.

Greater flexibility regarding office accommodation is sought in some submissions with a request that the matrix of uses for Z5, Z6, Z14 and other mixed use zonings should include 'office' use as being permitted in principle.

There is a specific request from the Irish Aviation Authority that the zoning maps should retain reference to Public Safety Zones relating to aircraft flight paths. Other submissions relating to zoning raise issues such as ensuring sufficient zoned land to facilitate educational use and places of worship.

There were also a number of submissions relating to Z6 zoned land in the City seeking a review of these lands for more appropriate higher density development in line with the principles of compact growth. In some instances, SDRA designation was sought. There was one submission that sought retention of an existing industrial land use zoning on such lands, and that the Council give consideration to issues such as residential amenity and Seveso sites when considering the rezoning of such lands.

Other submissions called for a zoning review to consider the development potential of publicly owned lands for greater densification. It was noted that there were also a number of site specific zoning requests.

Miscellaneous

Legislation Provisions and Guidelines

Part V: Concerns were raised in some submissions regarding the Part V process, its implementation and that social housing is not allocated to local people. One submission requested consideration of a 'Part V' provision for green infrastructure / social infrastructure to be applied to new large scale development.

Ministerial Guidelines – A number of submissions made representations regarding Government Guidelines with concerns that they erode local democratic powers. Particular concerns were raised in some submissions regarding the Ministerial guidelines on height and their negative effects on the physical character / residential amenity / land values of Dublin.

Strategic Housing Development Process – There were also a number of submissions highlighting concerns regarding the SHD process due to a perceived loss of local democracy and the right of the Board to materially contravene the Development Plan on matters of height and density.

Vacant sites – There were calls in a number of submissions for more effective implementation of the vacant sites levy. There were also requests for the implementation of Use it or Lose it measures. A number of submissions also suggested better active land measures. The role of LDA in developing strategic lands in the City was also noted by some.

Living City Initiative – A number of submissions highlighted concerns with the Living City Initiative and that the criteria of same need to be broadened.

Governance/Autonomy

Some issues raised in submissions under this topic include:

- Need for greater autonomy for the local authority in the implementation of Development Plan.
- Need for greater engagement and consistency between the Dublin local authorities.
- The need for Dublin City Council to retain control of development land for housing.
- Call for new area committee led planning process.
- Need for a City mayor/night time mayor.
- That the current planning system does not deliver affordable or desirable city living and that other models of development governance should be explored

Engagement – Consultation & Communication

Issues raised in some of the submissions included:

- The need for consultation with the Department of Education regarding school needs assessments.
- The need for consultation with disabled person's organizations on matters such as universal design and accessibility.

- The need for greater and more meaningful community engagement and local consultation.
- That there is a need for a detailed Public Communications Strategy to ensure that the City Development Plan is successfully monitored and delivered.
- That the Planning Authority should ensure that children's voices are heard in writing the plan and that it was regrettable that the online submission form precludes the participation of children under 16.

Other Matters

There were a significant volume of observations seeking more bins, public toilets, public seating, wheelchair friendly public facilities, dog poo bins, public water fountains, Dublin bikes scheme extension, etc.

There were also some more generalised comments and submissions about the procedure of making and implementing a development plan including:

- Inclusion of a progress report of last Development Plan to accompany the Draft Development Plan.
- Improve access to information on variations to existing plans and zoning objectives.
- There were also references to a number of policies and programmes such as the Intercultural Cities Programme and UN Safe Cities for Women, Children and the Aged and that these should be included and referenced in the plan.
- City Plan should be gender and diversity proofed.

Outside Scope of the Development Plan

Extant Planning Permission/Development

There were a number of submissions that referenced extant planning permissions and specific developments and proposals including cycleways.

Enforcement

There were a number of submissions relating to enforcement issues in DCC including commentary regarding matters such as heritage buildings in poor condition, short term letting, unauthorised roof gardens, illegally parked vehicles, dog fouling, litter laws/street cleaning and enforcement of building regulations.

Licencing and Permits

There were a small number of submissions including matters such as licences for out of hours construction work and that there should be revised licencing to facilitate late night openings for bars and venues. Some concerns were raised regarding the licencing of waste collection services and that waste collection should be under municipal control. There were also submissions regarding the need for licencing to facilitate more house boats on our waterways.

Funding, Grants, Tax Incentives, Rent Relief, Rates etc.

There were a large number of observations made under this topic. A number of submissions sought grants, tax reliefs etc. to facilitate and stimulate different types of development. Examples included incentives, tax breaks and financial grants to promote living over the shop and reuse of vacant premises; financial incentives to

refurbish heritage buildings; incentives for venues to host Irish language classes; retail supports, rates relief etc. post Covid pandemic; tax relief to encourage certain types of housing; reduction of commercial rates, particularly, for temporary uses; climate action grants; tax on plastic packaging etc. There were also calls for greater financial support for local sports clubs, for the cultural sector and academic studies as well as some submissions that referenced the local property tax. There were also submissions which called for the reduction of development contributions in order to stimulate development on brownfield infill sites.

Transport Projects

There were many observations in support of the proposed Bus Connects, Metro, Luas, Dart electrification projects but equally many opposed to them based on potential impacts these public transport projects would have on local areas especially when coupled with existing localised traffic and parking issues.

Other transport related submissions on matters outside the scope of the Development Plan included free public transport for the disabled, reduced fares on public transport, electrification of the Dublin Bus fleet, introduction of congestion charging, the need for night time public transport services; ban of HGV traffic in certain areas and that there should be no traffic allowed through the Phoenix Park.

Service Utilities

There were a number of general observations made under this topic relating to the upgrade and improvement to existing services including broadband, water supply, water pressure, foul sewage, water leaks etc. Many submissions related to specific localised issues in certain parts of the City. There were some references to strategic national projects. Concerns were raised in one submission regarding the safety and security of communications technology. There were also a number of submissions raising concerns regarding poor Wifi.

DCC Operations

There were a significant number of observations made under this topic due to the wide range of services provided by Dublin City Council on a day to day operational basis.

The more common topics raised were litter management, illegal dumping, illegal parking, traffic calming measures, dog fouling, dog management, street cleaning, antisocial behaviour, public housing management, accessibility and general maintenance and improvement of the public realm, pest and vermin control, digitisation of council services etc.

Other Matters

There were a number of observations on other matters that are outside the scope of a Development Plan. These include matters such as eviction bans and rental controls, living wage, criminality and drugs, direct provision, community policing, privatisation of health care, mother and baby homes, resourcing and staffing requirements of DCC, apprenticeship programmes, alcohol sponsorship, insurance for artists/arts and cultural groups, late opening of cultural institutions There was also a number of observations relating to public safety in the City due to anti-social behaviour as well as policing and security matters.

Chief Executive's Response in Relation to Other Issues

Development Management/Standards

Existing development standards relating to the densification of the City such as plot ratio, site coverage, private and communal open space requirements, separation distances etc. will be reviewed in the forthcoming plan. Standards for apartments must be included and consistent with the Sustainable Urban Housing – Design Standards for New Apartments – Guidelines for Planning Authorities 2018.

The forthcoming plan will include a review of the existing height strategy and be consistent with the Urban Development and Building Height Guidelines for Planning Authorities 2019.

Policy guidance regarding footpath clutter will be detailed in the Draft Development Plan.

The justification for reuse of existing buildings within a development proposal over demolition from a sustainability perspective (including embodied energy and carbon sequestration etc.) will be taken into consideration in the policy and objectives of the Draft Development Plan.

Proposals of a domestic nature regarding parking spaces affecting on and off street settings linked to electric vehicles and inclusion of charge points will be reviewed.

Observations regarding the wide ranging issues associated with the parking and storage of bicycles in both domestic and nondomestic settings, are noted and will be considered in the plan, including further guidance on parking standards and design requirements. Similarly, there will be a comprehensive review of car parking standards for both domestic and commercial developments.

Observations on specific Development Standards relating to house standards, apartment storage, attic conversions, granny flats, subdivision of housing units, set-backs, rooftop gardens and sound proofing in late night venues will be taken into consideration in the formulation of appropriate development standards. Consideration will be given to the merits of energy assessment (seeking sequestration, embodied energy and emissions) biodiversity impact monitoring and equality auditing of public realm in development management guidance.

Zoning

Land use zonings with respect to current performance, associated uses, location, and quantum will be reviewed as part of the plan making process. This comprehensive review process will take into account the outcomes of public consultations, review work since the last Development Plan, the experience from development management, significant ABP decisions and the outcome of departmental and interdepartmental working groups within DCC.

The performance of the Z6 zoning objective will be further considered and the potential of such brownfield industrial lands to be developed for more appropriate higher intensity mixed use development will be considered in the forthcoming plan.

Assessment of the performance of existing SDRAs and the potential for future SDRAs within the City will also be considered in the forthcoming plan. It is acknowledged that these lands play a significant role in the future development strategy for the City and implementation of the core strategy.

Airport Public Safety Zones will be reviewed and updated. No site specific zonings are taken into account at this stage of the development plan process as the pre-draft stage deals solely with strategic issues.

Miscellaneous

Issues regarding legislative provisions and guidelines, governance/autonomy, engagement, consultation and communication and other matters while linked to the Development Plan, generally fall outside the scope and remit of the making of a Development Plan. In the interest of clarity, DCC are obliged and mandated to accord with government legislation under the Planning and Development Act 2000, as amended and the Planning and Development Regulations, 2001, as amended for the purposes of making a development plan. This legislation also sets out the statutory procedures and timelines for when public consultation takes place for the making of the Development Plan.

Matters such as Part V are governed by the statutory provisions of the Planning and Development Act, with which the Council must comply.

Ministerial national planning policy guidelines such as the Urban Development and Building Height Guidelines for Planning Authorities must be incorporated into the Development Plan and the Council must comply with the SPPR's set out therein. Concerns regarding the SHD process are noted. However, this is a process governed by the Planning and Development (Housing) and Residential Tenancies Act 2016 and the Planning and Development (Strategic Housing Development) Regulations 2017, to which the City Council must comply and which is outside the remit of the Development Plan process. It is understood that the SHD provision will be rescinded in February 2022, before the new Development Plan is adopted.

Commentary regarding vacant sites is noted and the City Council will continue to proactively utilise active land measures such as the vacant site levy to drive forward the regeneration and intensification of underutilised lands in the City. The plan will include appropriate policies in this regard. The council work with the LDA to bring forward the development of lands as appropriate.

DCC will endeavour to continue improving the engagement and communications methods used to consult and foster participation in the Development Plan process. As part of this consultation phase, the Council engaged in a number of innovative consultation methods, the details of which are set out in section 1 of this report. The number of submissions at this first consultation period of the Development Plan, is a significant increase compared to this phase of the current operational plan, demonstrating a growing and active participatory audience. The use of on line fora, influenced by the Covid pandemic Government restrictions, have seen significant numbers in attendance at the pre-draft consultation webinars, with much real-time positive feedback recorded. DCC aim to build on this for future public consultations associated with the Development Plan.

With regard to youth engagement, it is noted that children under the age of 16 cannot make a submission through the public consultation portal due to GDPR restrictions. Submissions can however, be made with consent of a guardian. Significant efforts were made to engage with young people during the pre-draft consultation phase including a poster competition and active engagement with Comhairle na nÓg.

The high volume of submissions regarding infrastructure including bins, public toilets and other facilities and amenities is noted and will be considered as appropriate in the policies developed in the forthcoming plan and/or brought to the attention of the relevant Departments.

The plan making process will consider all relevant international, national, regional and local policy and programmes in formulating the strategic vision and policies and objectives. With reference to a progress report of the last Development Plan, a 2 year review of the implementation of the current plan has been prepared. The plan will include appropriate policies regarding diversity and inclusion.

Outside Scope of Development Plan

Issues regarding extant planning permission/development, enforcement, licencing and permits, funding, grants, tax incentives, development contributions, rent relief, rates, transport projects, service utilities, and other matters all fall outside the scope of the making of a development plan. DCC operational matters including issues such as waste management, street cleaning etc. are not a development plan matter. Issues such as anti-social behaviour are a policing matter.

Land use zonings will be reviewed as part of the plan making process. This comprehensive review process will take into account the outcomes of public consultations, review work since the last Development Plan, the experience from development management, significant ABP decisions and the outcome of departmental and interdepartmental working groups within DCC. Codema etc. all in order to secure the delivery of an effective and deliverable Development Plan.

Specifically with respect to national transport projects such as Bus Connects and Metro, separate public consultation procedures and processes are carried out by the relevant agencies to advance these strategic projects. The alignment and route selection processes of these projects is outside the scope of the Development Plan. DCC will work with the relevant agencies to facilitate the delivery and implementation of these strategic projects in order to improve the public transportation offer for the City.

The delivery of strategic water projects is within the remit of Irish Water and outside the scope of the Development Plan.

Chief Executive's Recommendations on Policies and Objectives for Inclusion in the Draft Development Plan in Relation to Other Issues

- Review development management standards of the Development Plan to ensure consistency with National and Regional Planning policy and in particular, Sustainable Urban Housing – Design Standards for New Apartments – Guidelines for Planning Authorities 2018.
- Prepare a Height Strategy in accordance with the guidance set out in the Urban Development and Building Height Guidelines for Planning Authorities 2019.
- Review all zoning objectives to take account of national policy, emerging planned transport networks and in accordance with the proper planning and sustainable development of the City.
- Further examine Z6 as a zoning category and identify further opportunities for intensification in line with the principles of compact growth.
- Review and update all Strategic Development and Regeneration Areas (primarily Z14) and ensure desirable future land uses are given appropriate priority. Designate new SDRA's as appropriate having regard to both their strategic significance and also changes in their planning related context.
- Continue inclusion of Airport Public Safety Zones and SEVESO sites, as specific mapping objectives.

Summary of Strategic Environmental Assessment (SEA) / Appropriate Assessment (AA) / Strategic Flood Risk Assessment (SFRA) Related Issues

Submission Number(s):

S-00012, S-00114, S-00668, S-00048, S-00108, S-00692 and S-00553.

Introduction

In relation to Strategic Environmental Assessment (SEA), submissions provided general advice, comments, and information on legislation and access to information in relation to the SEA of the Draft Plan as required under Article 13C of the Planning and Development Regulations 2001, as amended and in accordance with Directive 2001/42/EC (The SEA Directive) as implemented in Ireland by the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended by S.I. No. 201 of 2011).

Submissions included general comments in relation to the provision of Appropriate Assessment as required under Article 6 of the Habitats Directive, following the guidance papers provided by EPA, utilising tools such as EPA AA GeoTool application and GSI Map Viewer.

Several submissions raised issues in relation to protecting European sites, biodiversity, riparian buffer zones and addressing flood management. There is a general recommendation to engage with the relevant bodies at an early stage (Department of Housing, Local Government and Heritage (DHLGH); Environmental Protection Agency (EPA); Office of Public Works (OPW); Irish Water and National Parks and Wildlife Service (NPWS).

For Summary of Strategic Environmental Assessment (SFRA) - Flooding Issues / the CEO's Opinion on Main SFRA - Flooding Issues Raised / Recommendation on SFRA - Flooding Policies and Objectives for Inclusion in the Draft Plan, see Theme 10 Strategic Environmental Infrastructure and Flood Risk.

Environmental Protection Agency (EPA)

EPA has launched a new application for public authorities; a GIS based application, to allow key aspects of the environment to be explored, to inform the SEA screening and scoping stage of plans and programmes. The EPA submission recommends the use of the EPA publication Integrated Biodiversity Impact Assessment – Streamlining AA, SEA and EIA Processes, Best Practice Guidance to inform. In relation to SEA, the EPA provided a copy of its guidance document '*SEA of Local Authority Land-Use Plans- EPA Recommendations and Resources*', which provides information on key environmental recommendations to consider; wider considerations; links to environmental resources; and information on key national and regional plans, programmes and strategies.

Key Environmental Considerations for the Draft Plan and the SEA, include:

- Provision of safe and secure supply of drinking water and conservation of water resources;
- Need to provide and maintain adequate and appropriate wastewater treatment infrastructure;
- Protection of valuable surface, ground water resources and bathing waters with reference to the Water Framework Directive;
- Flood risk, flood risk management and integrated coastal zone management;
- Need to address climate change and the inclusion of climate adaptation and mitigation measures;
- In relation to Air Quality and to Noise, the need to avoid, prevent or reduce harmful effects on human health and the environment as a whole;
- Promotion of integration of land use zoning and development to existing and planned availability of waste infrastructure and capacity; and
- Take account of where significant concentrations of radon can occur.

Wider environmental considerations include biodiversity, energy conservation and renewable energy, landscape, geology / geomorphology; human health / quality of life; transportation; infrastructure planning; and Environmental Impact Assessment (EIA).

Specifically, the EPA recommends that the Draft CDP should promote the application of the guidance set out in the DECLG Publication '*Appropriate Assessment of Plans and Projects in Ireland- Guidance for Planning Authorities*' (2009; revision 2010), in relation to the requirements of Article 6 of the Habitats Directive. The draft CDP should include a commitment to ensure compliance with the requirements of Article 6 of the Habitats Directive. Protection of European sites with clear policies/objectives which demonstrate an understanding of the potential for cumulative/in-combination effects.

The EPA recommends that National Parks and Wildlife Service (NPWS) are consulted with regards to screening of the draft CDP for Appropriate Assessment. Where Appropriate Assessment is required, any findings or recommendations should be incorporated into the SEA and the draft CDP, as appropriate. The draft CDP should include clear policies/objectives to conserve and protect all designated sites within and adjacent to the draft CDP area (including the habitats and/or species for which they have been selected, or which they support), and should also promote the protection of undesignated sites and local biodiversity features. The draft CDP should also promote the need to protect wider aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity, the provision of buffer zones between developments and areas of significant biodiversity and ensuring appropriate control and management measures for invasive species.

Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media

The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media recommends that ecological impact assessment (EclA) and AA will be undertaken in relation to all downstream plans and projects. In relation to formulating objectives and policies for riparian zones in the CDP the Department recommends the Inland Fisheries Ireland publication '*Planning for Watercourses in the Urban Environment*' (currently being updated). The Department would like to see where possible, stream enhancement

measures, re-opening of culverted rivers and the use of ecologically friendly box culverts in preference to piped culverts. The protection of biodiversity and riparian zones and the continuance of the current Green Infrastructure Plan is also recommended. The Department recommends that light pollution and associated impacts on bat species are considered in planning. The Department further advises that the Appropriate Assessment of the draft CDP should include an assessment of the impacts of nitrogen deposition on Natura 2000 sites within the draft CPD's zone of influence.

The Department provides advice in relation to Nature Conservation, both on European Sites as well as the wider ecological environment and draws attention to avoiding policies and objectives that may undermine or be in direct conflict with natural heritage policies and objectives.

The Department acknowledges the recognition given to the prominence and value afford to the importance of protecting Dublin City's Built and Archaeological Heritage and supports the Council's intention to produce the City Heritage Plan to underpin and complement the actions of the Development Plan. In order to progress future stages of the Development Plan and the Heritage Plan the National Monuments Service is willing to engage with the Development Plan Team to assist in the production of a sustainable approach.

The Department highlights the importance of restoring and protecting nature for tackling climate change, and that the incorporation of Green Infrastructure (GI) in spatial planning is one of the ways in which the National Biodiversity Action Plan 2017 - 2021 seeks to address the main drivers of biodiversity loss in Ireland. The submission notes that Dublin's green infrastructure includes areas of international and national importance of habitats and species and further highlights the value of the City's canals, major rivers and smaller streams.

The Department draws attention to a number of threats and pressures on nature conservation including: water quality; invasive species; nitrogen deposition and light pollution and highlights the importance of monitoring the impact of the plan on biodiversity.

Department of Environment, Climate and Communications (Geological Survey Ireland)

The Department highlights the importance of Geoheritage and provides links to background resources. The Department welcomes references within the Strategic Issues Paper and recommends the inclusion of a policy objective such as:

"to protect from inappropriate development the scheduled list of geological heritage sites [Appendix X]."

or

"to protect from inappropriate development the following list of County Geological Sites"

The Department suggests that geoheritage could be promoted as part of wider tourism initiatives. The Department highlights the value of, and on-going work in the area of, documenting building and decorative stone in Ireland and the value of local

materials. In addition the Department highlights the value of Geological Mapping; the importance of Groundwater; potential risks from Geohazards; the opportunity of Geothermal Energy; and the presence of Natural Resources (Minerals / Aggregates).

The Marine and Coastal Unit highlights the significant importance of the marine environment to our bio-economy, transport, tourism and recreational sectors and provides links to information resources. The Department also notes that it is undertaking a new coastal vulnerability mapping initiative and provides links to on-going mapping.

Eastern Midland Regional Assembly

The submission from the Assembly specifically recommends early engagement with the relevant statutory bodies, including the Office of Public Works, Department of Housing, Local Government and Heritage, including the National Parks and Wildlife Service, the Environmental Protection Agency and Irish Water.

The Assembly recommends that the draft CDP take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned. It also proposes that riparian setbacks should be provided where appropriate, as set out in RPO 7.26.

The Regional Assembly highlights the opportunity for the integration of sustainable development targets and climate action obligations, including assessment of greenhouse gas emissions in accordance with RPOs 3.6 and 3.7 of the RSES. The submission also draws attention to Climate Action and to RSES Key Principle on Climate Action, supported by RSOs 6-11 and to information contained in chapters 4, 7, 8 and 10 of the RSES for assistance in developing an integrated climate policy.

An Taisce

The submission from An Taisce raised concerns relating to the protection of European designated sites in the Dublin area and the preservation of biodiversity during the implementation of the forthcoming plan. The recommendation that the CDP should provide for the immediate development of an Urban Greening Plan and to incorporate such a timeline and targeted policies within the draft CDP.

The Heritage Council

The submission by the Heritage Council sets out Key Priorities for the Plan in order to support delivery of United Nations Sustainable Development Goals (UN SDGs), the National Planning Framework (NPF), and the Regional Spatial and Economic Strategy (RSES). In addition the submission provides detailed suggestions in relation to 'Focus on City Centre and Buildings Renewal'; to 'Strategic Housing Developments (SHDs) and Investment in Building Stock'; and to 'Geo-spatial Data Gathering/Mapping, Communications and Public Engagement'.

The submission highlights issues around the impact of Climate Change on current heritage and future development in the City; establishment of sustainable key indicators and monitoring processes through SEA; acknowledgment of embodied carbon in existing buildings and the benefit of a buildings renewal plan; the need for

'Carbon Accountancy'; the need to include policy in support of 'Collaborative Town Centre Health Checks' for the City Centre;

The Heritage Council submission highlights on how DCC might ensure the United Nations Sustainable Development Goals are at the heart of the new City Development Plan and that all aspects of the management of Dublin Bay Biosphere Reserve are implemented in line with the Lima Action Plan for UNESCO's Man and the Biosphere (MAB) Programme and its World Network of Biosphere Reserves (2016-2025). The Heritage Council recommend that DCC prepare for the full implementation of Marine Protected Areas, both within the current list of designated Natura 2000 sites, proposed Natural Heritage Areas and Refuges for Fauna, but also seek to protect other significant biologically diverse areas such as deep-water reefs and shipwrecks that act as fish nurseries. They further recommend that DCC adopt the All-Ireland Pollinator Plan, the National Biodiversity Action Plan and support future iterations of same.

Chief Executive's Response in Relation to SEA/AA

Pursuant to the requirements of Article 13C of the Planning and Development Regulations 2001, as amended the preparation of the Draft Plan will be subject to Strategic Environmental Assessment in accordance with the requirements of Directive 2011/42/EC and associated implementing Irish legislation. In accordance with Article 13C of the Planning and Development Regulations 2001, as amended, the Strategic Environmental Assessment process will be subject to consultation with the specified environmental authorities.

Pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC), stage one Appropriate Assessment Screening and stage two Appropriate Assessment (AA) shall be carried out as part of the overall process.

Consultation with various statutory bodies (including the National Parks and Wildlife Service (NPWS)), best practice guidelines, published reports, online data sets and live mapping will be used to inform the report.

Chief Executive's Recommendations on Policies and Objectives for Inclusion in the Draft Development Plan in Relation to SEA/AA

- In relation to Strategic Environmental Assessment, the Draft Plan will incorporate appropriate policies or objectives required to avoid or reduce significant effects on the environment identified in the assessment process.
- In relation to Appropriate Assessment, any mitigation measures proposed to avoid impacts on Natura 2000 sites outlined in any NIR to be prepared as part of the forthcoming assessment process, would inform and guide policy of the draft plan.

Part 4: Appendices to Chief Executives Report

Appendix 1 Public Notice



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council



NOTICE OF THE INTENTION TO REVIEW THE DUBLIN CITY DEVELOPMENT PLAN 2016 – 2022 AND TO PREPARE A NEW DUBLIN CITY DEVELOPMENT PLAN 2022 – 2028

Notice is hereby given in accordance with Section 11(1) of the Planning and Development Act 2000 (as amended) that Dublin City Council intends to review the existing Dublin City Development Plan 2016 – 2022 and prepare a new Dublin City Development Plan 2022 – 2028.

The City Development Plan is strategic in nature for the purposes of developing objectives and policies to deliver the strategy for the proper planning and sustainable development of the area of the Development Plan (Dublin City) and a Core Strategy. It will also take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

STRATEGIC ENVIRONMENTAL ASSESSMENT AND APPROPRIATE ASSESSMENT

In compliance with the Strategic Environmental Assessment Directive (2001/42/EC) and accordance with Article 13B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436/2004) (as amended), the Planning Authority proposes to carry out a Strategic Environmental Assessment (SEA) as part of the review of the existing Development Plan and preparation of a new Development Plan. For this purpose, the Planning Authority will prepare an Environmental Report of the likely significant effects on the environment of implementing the new Plan. The provisions of Articles 13C to 13J of Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended) shall also apply. Pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC), a Stage One Screening for Appropriate Assessment (AA) shall be carried out as part of the overall process and subsequent stages of AA shall be carried out, if required.

PUBLIC CONSULTATION

The Public Consultation will take place between:

Tuesday 15th December 2020 to Monday 22nd February 2021 (inclusive).

The Council is encouraging members of the general public, businesses, resident's associations, and community organisations to have a say in influencing and helping to frame the general direction of the next City Development Plan. Information, including a booklet of the strategic issues facing the city, is available to download from the website. A dedicated Development Plan website has been set up at www.dublincitydevelopmentplan.ie. Details on the upcoming Webinar and any other relevant information will also be on the website and on our social media channels.

In addition to being on the website a copy of the Pre-Draft Public Consultation Strategic Issues Paper may be inspected for a period from **Tuesday 15th December 2020 to Monday 22nd February 2021 inclusive during public opening hours at the offices of Dublin City Council, Public Counter, Planning and Property Development Department, Block 4, Ground Floor, Civic Offices, Wood Quay, Dublin 8, Monday – Friday 9.00am to 4.30pm (excluding Bank Holidays) by appointment only.**

To make an appointment, please email planning@dublincity.ie or Phone 01 222 2149 from Monday to Friday (excluding Bank Holidays).

SUBMISSIONS/OBSERVATIONS

Making a submission is simply a way for you to give us your thoughts and ideas on what you think are the important things in planning for the future growth of Dublin City and your neighbourhood. Dublin City Council hereby invites any interested parties to make submissions or observations with regard to the review of the existing Dublin City Development Plan 2016 – 2022 and the preparation of the new Dublin City Development Plan 2022 – 2028 including the SEA and AA process. In respect of making a submission or observation please note the following:

- Submissions/observations at this stage of the overall Plan-making process should be strategic in nature and focus on 'big picture' issues. Please visit our website to get more information on these issues.
- Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the future of our city.
- Submissions/observations should include your name, and address and where relevant, details of any organisation, community group or company etc., which you represent. These details will be published in the Chief Executive's Report and online. Your address/email address will be used for correspondence purposes only and will be redacted if included in the submission.
- The Council cannot consider at this Pre-Draft stage of the City Development Plan process submissions or observations relating to the zoning and/or re-zoning of specific or particular parcels of land. These more detailed matters will be considered during the Draft Plan stage of the overall process – which is approximately 12 months away.
- All submissions will be published online in accordance with the requirements of the Planning Act. You are responsible for ensuring that no vexatious, libellous or confidential information, including confidential information in relation to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure) is included in your submission. The Planning Authority reserves the right to redact any submission or part thereof.

A submission can be made online via: www.dublincitydevelopmentplan.ie

or

by post

**Development Plan Team,
Planning and Property Development Department,
Dublin City Council,
Wood Quay, Dublin 8
D08 RF3F**

NOTE: Please make your submission by one medium only i.e. post/online. **The final date for receipt of all submissions is 4.30pm on Monday 22nd February 2021.** Please note late submissions will not be considered.

Important Note Regarding Submissions:

In accordance with Section 11 (3A)(a) of the Planning and Development Act, 2000 (as amended), written submissions or observations received by a Planning Authority under this section shall be published on the website of the authority within 10 working days of its receipt by that authority.

dublincity.ie

Appendix 2 Prescribed Bodies, Community and Voluntary Groups, Persons and Other Bodies Consulted

- Eastern & Midlands Regional Assembly, 3rd Floor North, Ballymun Civic Centre, Dublin 9 D09 C8P5.
- Dun Laoghaire Rathdown County Council, County Hall, Marine Road, Dun Laoghaire, Co. Dublin.
- Kildare County Council, Áras Cill Dara, Devoy Park, Naas, Co. Kildare.
- Wicklow County Council, County Buildings, Whitegates, Wicklow Town.
- Fingal County Council, County Hall, Main Street, Swords, Dublin K67 X8Y2.
- Forfás, Department of Jobs, Enterprise & Innovation, 23, Kildare Street, Dublin D02 TD30.
- Dublin Airport Authority, Head Office, Old Central Terminal Building, Dublin Airport, Co. Dublin.
- Minister for Education & Skills, Department of Education & Skills, Marlborough Street, Dublin 1.
- Environmental Health, Health & Wellbeing Division, HSE, Oak House, Limetree Avenue, Millennium Park, Naas, Co. Kildare.
- Minister for Communications, Climate Action and Environment Transport & Sport.
- Department of Communications, Climate Action, 29 – 31, Adelaide Road, Dublin 2.
- Transport Infrastructure Ireland, Land Use Planning Section, Parkgate Business Park, Parkgate Street, Dublin 8 D08 YFF1.
- National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2 D02 WT20.
- Minister for Culture, Heritage & the Gaeltacht, Department of Culture, Heritage & the Gaeltacht, 23, Kildare Street, Dublin 2.
- An Taisce – The National Trust for Ireland, Taylor’s Hall, Back Lane, Dublin 8 D08 X2A3.
- The Arts Council, 20, Merrion Square, Dublin 2 D02 NY52.
- Fáilte Ireland, 88-95, Amiens Street, Dublin 1 D01 WR86.
- The Heritage Council, Church Lane, Kilkenny, Co. Kilkenny R95 X264.
- Inland Fisheries Ireland, 3044, Lake Drive, Citywest Business Campus, Dublin 24 D24Y265.
- The Health & Safety Authority, The Metropolitan Building, James Joyce Street, Dublin 1 D01 K0Y8.
- Irish Aviation Authority, The Times Building, 11 -12, D’Olier Street, Dublin 2.
- Environmental Protection Agency, PO Box 3000, Johnstown Castle Estate, Co. Wexford Y35 W821.
- Irish Water – Forward Planning, Asset Strategy & Sustainability, PO Box 6000, Dublin 1.
- Minister for Housing, Planning & Local Government, Custom House, Dublin 1 D01W6X0.
- An Bord Pleanála, 64, Marlborough Street, Dublin 1 D01 V902.
- Minister for Agriculture, Food & the Marine, Climate Change Section, Johnstown Castle Estate, Co. Wexford.
- Taoiseach & Minister for Defence, Station Road, Newbridge, Co. Kildare.
- Eirgrid, The Oval, 160, Ballsbridge Road, Dublin 4 D04 FW28.
- ESB (Electric Ireland), PO Box 841, South City Delivery Office, Cork T12 C825.
- Waterways Ireland, 2, Sligo Road, Enniskillen, Co. Fermanagh BT74 7JY.

- Department of Public Expenditure & Reform with special responsibility for the Office of Public Works and Flood Relief, Government Buildings, Upper Merrion Street, Dublin 2 D02 R583.
- Tánaiste & Minister for Business Enterprise & Innovation, Department of Business Enterprise & Innovation, Kildare Street, Dublin 2.
- Minister for Transport, Tourism & Sport, 44, Kildare Street, Dublin 2.
- Office of the Planning Regulator, Block C, 77, Sir John Rogerson's Quay, Grand Canal Dock.
- IDA, Three Park Place, Hatch Street Upper, Dublin 2, D02 FX65
- LCDC, Community and Social Development Department, Block 3, Floor 1, Civic Offices, Dublin 8.
- Dublin City PPN, Community and Social Development Department, Block 3, Floor 1, Civic Offices, Dublin 8.
- Dublin City Comhairle na nÓg, Block 3, Floor 1, Civic Offices, Dublin 8.
- South Dublin County Council, County Hall, Tallaght, Dublin 24, D24 A3XC.
- Meath County Council, Buvinda House, Dublin Road, Navan, Co. Meath.
- Northern and Western Regional Assembly, The Square, Ballaghaderren, Co. Roscommon.
- Southern Regional Assembly, Assembly House, O'Connell Street, Waterford,
- Aware, 9 Leeson Street Upper, Ranelagh, Dublin 4, D04 KD80.
- Pavee Point, 46 Charles Street Great, Mountjoy, Dublin, D01 XC63.
- Headway, Blackhall Green, Blackhall Pl, Smithfield, Stoneybatter, Dublin 7, D07 RX67.
- Irish Society for Autism, Unity Buildings, O'Connell Street Lower, North City, Dublin 1.
- Immigrant Council of Ireland, 2 St Andrew Street, Dublin 2.
- National Council for the Blind, Whitworth Road, Drumcondra, Dublin 9.
- Chime, 35 North Frederick Street, Dublin 1.
- Irish Traveller Movement, 4/5 Eustace Street, Dublin 2.
- National Traveller Movement, Exchange House, National Travellers Service, 61 Great Strand Street, Dublin 1.

Appendix 3 Persons /Bodies that Made Written Submissions.

Submission Number and Name	Agent/Company	Portal Reference Number
S-00001 - Joe O'Connor		DCC-C18-ISSUE-1
S-00002 - JoAnne Mancini		DCC-C18-ISSUE-2
S-00003 - Alan Kelly		DCC-C18-ISSUE-4
S-00004 - Alan Kelly		DCC-C18-ISSUE-3
S-00005 - Constantin Roman		DCC-C18-ISSUE-5
S-00006 - Janine Brennan		DCC-C18-ISSUE-6
S-00007 - Cale Lawlor		DCC-C18-ISSUE-7
S-00008 - Haris Tamimi		DCC-C18-ISSUE-8
S-00009 - Tony Phillips		DCC-C18-ISSUE-9
S-00010 - Brian Sheehan		DCC-C18-ISSUE-10
S-00011 - Ciara Morgan		DCC-C18-ISSUE-11
S-00012 - Cian O'Mahony	Environmental Protection Agency	DCC-C18-ISSUE-12
S-00013 - Derek Doran		DCC-C18-ISSUE-13
S-00014 - Conor Quealy		DCC-C18-ISSUE-14
S-00015 - Peter Kehoe		DCC-C18-ISSUE-19
S-00016 - Daragh Tracey		DCC-C18-ISSUE-15
S-00017 - Daragh Tracey		DCC-C18-ISSUE-16
S-00018 - Tanya Jordan		DCC-C18-ISSUE-22
S-00019 - Daragh Tracey		DCC-C18-ISSUE-17
S-00020 - Daragh Tracey		DCC-C18-ISSUE-18
S-00021 - Daragh Tracey		DCC-C18-ISSUE-20
S-00022 - Daragh Tracey		DCC-C18-ISSUE-21
S-00023 - Lydia Nethercoat		DCC-C18-ISSUE-24
S-00024 - Daragh Tracey		DCC-C18-ISSUE-23
S-00025 - Ian Devlin		DCC-C18-ISSUE-25
S-00026 - Marion Bergin		DCC-C18-ISSUE-34
S-00027 - Taniya Offergeld		DCC-C18-ISSUE-26
S-00028 - Derek Whelan		DCC-C18-ISSUE-27
S-00029 - Derek Whelan		DCC-C18-ISSUE-28
S-00030 - Jonathan Cooke		DCC-C18-ISSUE-29
S-00031 - Joe Potter		DCC-C18-ISSUE-30
S-00032 - Drimnagh Blockers	Drimnagh Blockers	DCC-C18-ISSUE-31
S-00033 - Megan Ennis		DCC-C18-ISSUE-33
S-00034 - Gabriele Sardelli		DCC-C18-ISSUE-32
S-00035 - Emma McKeagney		DCC-C18-ISSUE-35
S-00036 - Emma McKeagney		DCC-C18-ISSUE-36
S-00037 - Helen Murray		DCC-C18-ISSUE-37
S-00038 - Liam Bell		DCC-C18-ISSUE-38
S-00039 - Paul Ince		DCC-C18-ISSUE-39
S-00040 - John Conroy		DCC-C18-ISSUE-40
S-00041 - Kevin Hamell		DCC-C18-ISSUE-41
S-00042 - Christopher Hapka		DCC-C18-ISSUE-42

S-00043 - Christopher Hapka		DCC-C18-ISSUE-43
S-00044 - Christopher Hapka		DCC-C18-ISSUE-44
S-00045 - Zoe Baker		DCC-C18-ISSUE-45
S-00046 - Gabriel Brindamour		DCC-C18-ISSUE-46
S-00047 - Paul O'Shea		DCC-C18-ISSUE-47
S-00048 - Corporate Support Unit	Department of Environment, Climate and Communications	DCC-C18-ISSUE-48
S-00049 - Niall Mac Coitir		DCC-C18-ISSUE-49
S-00050 - Alan Mee		DCC-C18-ISSUE-50
S-00051 - Roisin O'Connell Hussey		DCC-C18-ISSUE-51
S-00052 - Leo McNamee		DCC-C18-ISSUE-52
S-00053 - Elvire Callaghan		DCC-C18-ISSUE-53
S-00054 - Deirdre Brady		DCC-C18-ISSUE-54
S-00055 - Kieran Mc Cann		DCC-C18-ISSUE-55
S-00056 - Richard Breen		DCC-C18-ISSUE-56
S-00057 - Yvonne Gregg		DCC-C18-ISSUE-57
S-00058 - Muireann Morris		DCC-C18-ISSUE-58
S-00059 - Brian Harvey		DCC-C18-ISSUE-59
S-00060 - Sharon Greene	Dublin Flea Market	DCC-C18-ISSUE-61
S-00061 - Jacqui Traynor	Department of Transport	DCC-C18-ISSUE-60
S-00062 - Seamus Collins		DCC-C18-ISSUE-62
S-00063 - Seamus Collins		DCC-C18-ISSUE-63
S-00064 - Kate Murphy		DCC-C18-ISSUE-64
S-00065 - Francesca D'Angelo		DCC-C18-ISSUE-65
S-00066 - Chris Mills		DCC-C18-ISSUE-66
S-00067 - Helga Hertsig-Lavocah		DCC-C18-ISSUE-67
S-00068 - Helga Hertsig-Lavocah		DCC-C18-ISSUE-68
S-00069 - Helga Hertsig-Lavocah		DCC-C18-ISSUE-69
S-00070 - Sinead Haugh		DCC-C18-ISSUE-70
S-00071 - Angeline Kenny		DCC-C18-ISSUE-73
S-00072 - Kathryn Reilly	Irish Heart Foundation	DCC-C18-ISSUE-74
S-00073 - Liam Halligan		DCC-C18-ISSUE-75
S-00074 - Lucy Hederman		DCC-C18-ISSUE-121
S-00075 - Gerry Fitzpatrick		DCC-C18-ISSUE-76
S-00076 - Sonya Earls		DCC-C18-ISSUE-77
S-00077 - Clare Doherty		DCC-C18-ISSUE-78
S-00078 - Dean Carroll		DCC-C18-ISSUE-79
S-00079 - Frank Keoghan		DCC-C18-ISSUE-80
S-00080 - Eamonn O'Reilly	Dublin Port Company	DCC-C18-ISSUE-81
S-00081 - Paul Ryan		DCC-C18-ISSUE-82
S-00082 - Ciarán McGahon		DCC-C18-ISSUE-83

S-00083 - Leo Hassett		DCC-C18-ISSUE-84
S-00084 - Geoff Fitzpatrick	Nightlight Screens Limited	DCC-C18-ISSUE-85
S-00085 - Jo Homewood		DCC-C18-ISSUE-86
S-00086 - Rachel McNicholl		DCC-C18-ISSUE-87
S-00087 - Ciara Barnes		DCC-C18-ISSUE-88
S-00088 - David Dunne		DCC-C18-ISSUE-90
S-00089 - Rosemary Ryan		DCC-C18-ISSUE-89
S-00090 - Niall Loftus		DCC-C18-ISSUE-91
S-00091 - Donnybrook Tidy Towns	Donnybrook Tidy Towns	DCC-C18-ISSUE-92
S-00092 - Feargal O'Neill		DCC-C18-ISSUE-94
S-00093 - Ciarán McGahon		DCC-C18-ISSUE-93
S-00094 - Georgina Byrne		DCC-C18-ISSUE-95
S-00095 - Rory Rutledge		DCC-C18-ISSUE-96
S-00096 - Rory Rutledge		DCC-C18-ISSUE-97
S-00097 - Rory Rutledge		DCC-C18-ISSUE-98
S-00098 - Rory Rutledge		DCC-C18-ISSUE-99
S-00099 - Rory Rutledge		DCC-C18-ISSUE-100
S-00100 - Sean Brennan		DCC-C18-ISSUE-101
S-00101 - Jack Kavanagh		DCC-C18-ISSUE-102
S-00102 - Brian Stafford		DCC-C18-ISSUE-103
S-00103 - Rosemary Ryan		DCC-C18-ISSUE-104
S-00104 - Brian Stafford		DCC-C18-ISSUE-105
S-00105 - Simeon Rimmer		DCC-C18-ISSUE-118
S-00106 - John Neary		DCC-C18-ISSUE-106
S-00107 - Peter McCarthy		DCC-C18-ISSUE-107
S-00108 - Pauline Riordan	Eastern and Midland Regional Assembly	DCC-C18-ISSUE-108
S-00109 - Lisa English	EirGrid	DCC-C18-ISSUE-109
S-00110 - Marcas Suibhne		DCC-C18-ISSUE-110
S-00111 - David Donnelly		DCC-C18-ISSUE-111
S-00112 - Brian O'Neill		DCC-C18-ISSUE-113
S-00113 - James O'Reilly	Raglan Road Residents' Planning Group	DCC-C18-ISSUE-112
S-00114 - David O'Connell		DCC-C18-ISSUE-115
S-00115 - Rachel Woodward	Office of Public Works	DCC-C18-ISSUE-114
S-00116 - Kevin Harrington		DCC-C18-ISSUE-124
S-00117 - Aengus King		DCC-C18-ISSUE-116
S-00118 - Michelle Moore	Ava Housing CLG	DCC-C18-ISSUE-117
S-00119 - Damian Penco		DCC-C18-ISSUE-119
S-00120 - Brendan Heneghan		DCC-C18-ISSUE-126
S-00121 - Beth O'Halloran		DCC-C18-ISSUE-122
S-00122 - Conor McKiernan		DCC-C18-ISSUE-123
S-00123 - Ellen Gavin		DCC-C18-ISSUE-125
S-00124 - Lorraine Judge		DCC-C18-ISSUE-129

S-00125 - Eilis Davey		DCC-C18-ISSUE-128
S-00126 - Mark Cullen		DCC-C18-ISSUE-127
S-00127 - Sinead Kennedy	Aqua Homes Ireland	DCC-C18-ISSUE-139
S-00128 - David McCormick	Weir & Sons	DCC-C18-ISSUE-146
S-00129 - Alastair Haughton		DCC-C18-ISSUE-132
S-00130 - Sonia Haccius		DCC-C18-ISSUE-145
S-00131 - Deborah Byrne		DCC-C18-ISSUE-134
S-00132 - John McCall		DCC-C18-ISSUE-136
S-00133 - Maria Waterhouse		DCC-C18-ISSUE-137
S-00134 - Martina Mullin	Trinity College Dublin	DCC-C18-ISSUE-138
S-00135 - Lorna Callanan	Terenure Residents' Association	DCC-C18-ISSUE-140
S-00136 - Róisín Shortall		DCC-C18-ISSUE-150
S-00137 - Racheal Bourke	Councillor	DCC-C18-ISSUE-151
S-00138 - Rory Rutledge		DCC-C18-ISSUE-153
S-00139 - Ralph McGarry		DCC-C18-ISSUE-158
S-00140 - Deirdre Finan		DCC-C18-ISSUE-154
S-00141 - Maria Mulvany		DCC-C18-ISSUE-156
S-00142 - Elizabeth Sherry		DCC-C18-ISSUE-155
S-00143 - William Fagan		DCC-C18-ISSUE-159
S-00144 - Audrey Brennan		DCC-C18-ISSUE-160
S-00145 - Brenna Clarke		DCC-C18-ISSUE-162
S-00146 - Peter McDonnell	All Hallows Area Association	DCC-C18-ISSUE-161
S-00147 - Nakul Wali		DCC-C18-ISSUE-72
S-00148 - Ultan Dillon		DCC-C18-ISSUE-381
S-00149 - Nathalie Crowley		DCC-C18-ISSUE-338
S-00150 - Nakul Wali		DCC-C18-ISSUE-71
S-00151 - Jack Prenderville		DCC-C18-ISSUE-235
S-00152 - Rebecca Mullin	Office of Public Works	DCC-C18-ISSUE-574
S-00153 - Helen McDonald	Dublin Friends of the Earth	DCC-C18-ISSUE-245
S-00154 - Patricia Fahey		DCC-C18-ISSUE-389
S-00155 - Damian Penco		DCC-C18-ISSUE-120
S-00156 - Phoebe Brady		DCC-C18-ISSUE-444
S-00157 - Valerie Roche		DCC-C18-ISSUE-174
S-00158 - Mary Horne		DCC-C18-ISSUE-191
S-00159 - Roman McGoldrick		DCC-C18-ISSUE-570
S-00160 - Brendan Flynn	Pegaso Ltd T/A The Church	DCC-C18-ISSUE-130
S-00161 - Clare Bowe		DCC-C18-ISSUE-226
S-00162 - Ciarán Cuffe		DCC-C18-ISSUE-131
S-00163 - Rebecca Jeffares		DCC-C18-ISSUE-280
S-00164 - Peter Nash		DCC-C18-ISSUE-168
S-00165 - Kieran McDermott	Pro-Cathedral Parish	DCC-C18-ISSUE-133
S-00166 - Sabrina Zhang	The Chartered Institute of Logistics & Transport in Ireland	DCC-C18-ISSUE-135
S-00167 - Jane McNicholas	Dublin South City Partnership	DCC-C18-ISSUE-141

S-00168 - Martina Keenan Rivero	Hines Real Estate	DCC-C18-ISSUE-142
S-00169 - Mia Gallagher		DCC-C18-ISSUE-222
S-00170 - RDS Royal Dublin Society	RDS	DCC-C18-ISSUE-143
S-00171 - Alicia McGivern	IFI	DCC-C18-ISSUE-371
S-00172 - Emma Silver	Bird	DCC-C18-ISSUE-144
S-00173 - Tara Spain	TII	DCC-C18-ISSUE-310
S-00174 - Katherine Kelliher	Dorset Street Together Group	DCC-C18-ISSUE-147
S-00175 - Damien Conway	Camgill Property A Tri	DCC-C18-ISSUE-148
S-00176 - Quanta Capital	Quanta Capital	DCC-C18-ISSUE-149
S-00177 - Patrick Magennis	Park Rite	DCC-C18-ISSUE-152
S-00178 - Paul Leech		DCC-C18-ISSUE-520
S-00179 - Reg McCabe	IWAI	DCC-C18-ISSUE-342
S-00180 - Seamus O'Ciosain		DCC-C18-ISSUE-157
S-00181 - Lucy Medlycott	ISACS Network	DCC-C18-ISSUE-439
S-00182 - Sophie Brazil		DCC-C18-ISSUE-210
S-00183 - Christine Moran	Cherryfield Avenue Upper Residents Association	DCC-C18-ISSUE-163
S-00184 - Aisling Rogerson	The Fumbally	DCC-C18-ISSUE-166
S-00185 - Christine Moran	Cherryfield Avenue Upper Residents Association	DCC-C18-ISSUE-164
S-00186 - Richard Bruton		DCC-C18-ISSUE-165
S-00187 - Britta Thiemt		DCC-C18-ISSUE-205
S-00188 - Aisling Rogerson	The Fumbally	DCC-C18-ISSUE-167
S-00189 - Aisling Rogerson	The Fumbally	DCC-C18-ISSUE-169
S-00190 - Annette Nugent	CLG Na Fianna	DCC-C18-ISSUE-170
S-00191 - Rory Donegan		DCC-C18-ISSUE-171
S-00192 - Rachel Flynn		DCC-C18-ISSUE-172
S-00193 - Aileen Cashman		DCC-C18-ISSUE-173
S-00194 - Sara Stephens		DCC-C18-ISSUE-176
S-00195 - Luke McGivern		DCC-C18-ISSUE-175
S-00196 - Ciarán Cuffe		DCC-C18-ISSUE-181
S-00197 - Fíonán Ó Cuireáin		DCC-C18-ISSUE-177
S-00198 - Hans Dubois		DCC-C18-ISSUE-178
S-00199 - Dermot O'Doherty		DCC-C18-ISSUE-182
S-00200 - Martina Marinova		DCC-C18-ISSUE-180
S-00201 - Maire NiRiain		DCC-C18-ISSUE-179
S-00202 - Caroline Conroy		DCC-C18-ISSUE-212
S-00203 - Fionnuala Brennan		DCC-C18-ISSUE-183
S-00204 - Ciara Keating		DCC-C18-ISSUE-184
S-00205 - Jay Yates		DCC-C18-ISSUE-185
S-00206 - Anne Murphy		DCC-C18-ISSUE-339
S-00207 - Declan O'Brien		DCC-C18-ISSUE-186
S-00208 - Stephen O'Dwyer	Tang	DCC-C18-ISSUE-189

S-00209 - Vanessa Moore		DCC-C18-ISSUE-187
S-00210 - Lawrence Hemmings		DCC-C18-ISSUE-188
S-00211 - Denis M-Baker	IWAI Royal Canal Branch	DCC-C18-ISSUE-190
S-00212 - Sarah Bredin		DCC-C18-ISSUE-192
S-00213 - Zoe Obeimhen		DCC-C18-ISSUE-193
S-00214 - Zoe Obeimhen		DCC-C18-ISSUE-194
S-00215 - David McDermott		DCC-C18-ISSUE-195
S-00216 - Zoe Obeimhen		DCC-C18-ISSUE-196
S-00217 - Zoe Obeimhen		DCC-C18-ISSUE-197
S-00218 - Conor Hogan		DCC-C18-ISSUE-202
S-00219 - S McBride		DCC-C18-ISSUE-198
S-00220 - Christine Moran	Cherryfield Avenue Upper Residents Association	DCC-C18-ISSUE-199
S-00221 - Zoe Obeimhen		DCC-C18-ISSUE-200
S-00222 - Christine Moran	Cherryfield Avenue Upper Residents Association	DCC-C18-ISSUE-201
S-00223 - Zoe Obeimhen		DCC-C18-ISSUE-203
S-00224 - Brenna Clarke		DCC-C18-ISSUE-204
S-00225 - Catherine Melody		DCC-C18-ISSUE-206
S-00226 - Nicole Kavanagh		DCC-C18-ISSUE-209
S-00227 - John McNamara		DCC-C18-ISSUE-207
S-00228 - Christine Moran	Cherryfield Avenue Upper Residents Association	DCC-C18-ISSUE-208
S-00229 - Esther Donohoe		DCC-C18-ISSUE-211
S-00230 - Mark Lane		DCC-C18-ISSUE-213
S-00231 - Karen Saunders		DCC-C18-ISSUE-214
S-00232 - Brian Kelly	Templeogue Synge Street GFC	DCC-C18-ISSUE-305
S-00233 - Ray Cunningham		DCC-C18-ISSUE-215
S-00234 - Suzanne Kilroy		DCC-C18-ISSUE-218
S-00235 - Suzanne Kilroy		DCC-C18-ISSUE-216
S-00236 - Ailish Finnegan		DCC-C18-ISSUE-217
S-00237 - John Dean	Save Markievicz Pool & Gym	DCC-C18-ISSUE-224
S-00238 - Carol Connolly		DCC-C18-ISSUE-219
S-00239 - Robert Murphy	Soma Sound	DCC-C18-ISSUE-220
S-00240 - Matthew Melis		DCC-C18-ISSUE-379
S-00241 - Fiona Walshe		DCC-C18-ISSUE-225
S-00242 - Niall O'Connell		DCC-C18-ISSUE-223
S-00243 - Seán Murphy		DCC-C18-ISSUE-229
S-00244 - Conor Treacy		DCC-C18-ISSUE-262
S-00245 - Gavin Daly		DCC-C18-ISSUE-221
S-00246 - Paul Tattersall		DCC-C18-ISSUE-228
S-00247 - Mary Enright		DCC-C18-ISSUE-230
S-00248 - Lucy Magee		DCC-C18-ISSUE-227
S-00249 - Ian Whyte	Eglinton Square Residents Association CLG	DCC-C18-ISSUE-231

S-00250 - Karen McCarthy		DCC-C18-ISSUE-234
S-00251 - Darren Campion		DCC-C18-ISSUE-243
S-00252 - Mórna Henehan		DCC-C18-ISSUE-232
S-00253 - Teresa Gallagher		DCC-C18-ISSUE-233
S-00254 - Simon Bailey		DCC-C18-ISSUE-264
S-00255 - Daniel Scully		DCC-C18-ISSUE-236
S-00256 - Darcy Bowman		DCC-C18-ISSUE-537
S-00257 - Odhran Linders		DCC-C18-ISSUE-237
S-00258 - Graham Hickey	Dublin Civic Trust	DCC-C18-ISSUE-505
S-00259 - Lee Dillon		DCC-C18-ISSUE-238
S-00260 - Susan Cummins	Irish Glass Bottle Housing Action Group	DCC-C18-ISSUE-239
S-00261 - Dee Kerins		DCC-C18-ISSUE-240
S-00262 - Ronan Carroll		DCC-C18-ISSUE-248
S-00263 - Anna Harkin	St Anne's Residents' Association, Kimmage Road West	DCC-C18-ISSUE-241
S-00264 - Gráinne Shaffrey		DCC-C18-ISSUE-244
S-00265 - Míde Power	Not Here Not Anywhere	DCC-C18-ISSUE-242
S-00266 - Emily Mason		DCC-C18-ISSUE-261
S-00267 - Joe Davitt	Ranelagh Gaels GAA	DCC-C18-ISSUE-276
S-00268 - Robin Mandal	Eglinton Residents' Association	DCC-C18-ISSUE-390
S-00269 - Christine Moran	Cherryfield Avenue Upper Residents Association	DCC-C18-ISSUE-246
S-00270 - Kieran Rose		DCC-C18-ISSUE-247
S-00271 - Alice Foley		DCC-C18-ISSUE-253
S-00272 - Cian McKenna		DCC-C18-ISSUE-249
S-00273 - Sebastian Vencken	Broadstone Together	DCC-C18-ISSUE-335
S-00274 - Mary Costello		DCC-C18-ISSUE-250
S-00275 - David Reddy		DCC-C18-ISSUE-252
S-00276 - Eugene Barrett	Knocklyon Network CLG	DCC-C18-ISSUE-383
S-00277 - Darragh Moriarty		DCC-C18-ISSUE-251
S-00278 - Adele Gannon		DCC-C18-ISSUE-254
S-00279 - Michael Banim		DCC-C18-ISSUE-266
S-00280 - Billy Maguire		DCC-C18-ISSUE-267
S-00281 - Deborah Poole		DCC-C18-ISSUE-256
S-00282 - Catherine Gorman		DCC-C18-ISSUE-255
S-00283 - Natasha Souter Johnson		DCC-C18-ISSUE-283
S-00284 - Lisa Byrne		DCC-C18-ISSUE-257
S-00285 - Sarah Lillis		DCC-C18-ISSUE-259
S-00286 - Niall Ó Ciosáin		DCC-C18-ISSUE-258
S-00287 - JP Randles	Western Attractions Ltd.	DCC-C18-ISSUE-263
S-00288 - Kate Rivers		DCC-C18-ISSUE-265
S-00289 - Cristina Carreon		DCC-C18-ISSUE-260

S-00290 - Denise Treanor		DCC-C18-ISSUE-279
S-00291 - Jamie Mann		DCC-C18-ISSUE-268
S-00292 - Brian Gormley		DCC-C18-ISSUE-274
S-00293 - Ringsend Irishtown Tidy Towns Environment Group Dunne		DCC-C18-ISSUE-271
S-00294 - Anne Bedos	Beyond The Junction	DCC-C18-ISSUE-269
S-00295 - Anne Bedos	Beyond The Junction	DCC-C18-ISSUE-270
S-00296 - Rob C		DCC-C18-ISSUE-273
S-00297 - Anne Bedos	Beyond The Junction	DCC-C18-ISSUE-272
S-00298 - Rebecca Jeffares		DCC-C18-ISSUE-281
S-00299 - Shane Fitzgibbon		DCC-C18-ISSUE-286
S-00300 - Colleen Joye	Herbert Park Area Residents Association	DCC-C18-ISSUE-275
S-00301 - Shay Connolly		DCC-C18-ISSUE-284
S-00302 - Killian Redmond		DCC-C18-ISSUE-432
S-00303 - Claire McSweeney		DCC-C18-ISSUE-278
S-00304 - Oisín Ó hAlmhain		DCC-C18-ISSUE-277
S-00305 - Paul Smyth		DCC-C18-ISSUE-337
S-00306 - Steven Slusarski		DCC-C18-ISSUE-285
S-00307 - John Seery	O'Connell Street Revival Society	DCC-C18-ISSUE-282
S-00308 - Roisin Nic Oireachtaigh		DCC-C18-ISSUE-288
S-00309 - Mark Hillery		DCC-C18-ISSUE-287
S-00310 - My Lovely Horse Rescue	My Lovely Horse Rescue	DCC-C18-ISSUE-289
S-00311 - Robert Parkinson		DCC-C18-ISSUE-290
S-00312 - Alan O'Brien		DCC-C18-ISSUE-291
S-00313 - Claire Woods		DCC-C18-ISSUE-292
S-00314 - Zoe Obeimhen		DCC-C18-ISSUE-293
S-00315 - Zoe Obeimhen		DCC-C18-ISSUE-295
S-00316 - Pradeep Govender		DCC-C18-ISSUE-294
S-00317 - Daithí Doolan		DCC-C18-ISSUE-296
S-00318 - Daithí Doolan		DCC-C18-ISSUE-297
S-00319 - Andrew Kinsella	Urban Land Institute	DCC-C18-ISSUE-465
S-00320 - Daithí Doolan		DCC-C18-ISSUE-298
S-00321 - Daithí Doolan		DCC-C18-ISSUE-299
S-00322 - Daithí Doolan		DCC-C18-ISSUE-300
S-00323 - Daithí Doolan		DCC-C18-ISSUE-301
S-00324 - Daithí Doolan		DCC-C18-ISSUE-302
S-00325 - Daithí Doolan		DCC-C18-ISSUE-303
S-00326 - Kevin Donoghue		DCC-C18-ISSUE-304
S-00327 - Kevin Baker	Dublin Cycling Campaign	DCC-C18-ISSUE-436
S-00328 - Niamh McDonald	Irish Water	DCC-C18-ISSUE-307
S-00329 - Philip O'Callaghan	South Georgian Core Residents' Association	DCC-C18-ISSUE-306

S-00330 - Anne Fitzgerald		DCC-C18-ISSUE-308
S-00331 - Colm Healy	Dublin Bay South Green Party	DCC-C18-ISSUE-309
S-00332 - Hugh Mullen		DCC-C18-ISSUE-314
S-00333 - John O Donoghue	Dublin Community Growers	DCC-C18-ISSUE-355
S-00334 - Kieran Doyle O'Brien		DCC-C18-ISSUE-317
S-00335 - Pdraig Owens	Jamestown Village Limited	DCC-C18-ISSUE-351
S-00336 - Patricia Ryan	DYNAMIC DRIMNAGH FORUM	DCC-C18-ISSUE-316
S-00337 - Pamela Hutchings		DCC-C18-ISSUE-311
S-00338 - Louise Heeney	Meath County Council Planning Department	DCC-C18-ISSUE-313
S-00339 - Mashup Group Limited Autofulfill Limited	Mashup Group Limited and Autofulfil Limited	DCC-C18-ISSUE-312
S-00340 - Annette Nugent		DCC-C18-ISSUE-315
S-00341 - Patricia Fahey		DCC-C18-ISSUE-394
S-00342 - Aga Szot		DCC-C18-ISSUE-333
S-00343 - Darragh O'Neill		DCC-C18-ISSUE-320
S-00344 - Isoilde Dillon		DCC-C18-ISSUE-319
S-00345 - Nigel Clarke		DCC-C18-ISSUE-318
S-00346 - Seán McCabe		DCC-C18-ISSUE-430
S-00347 - Emma-Jane Morrissey	Irish Wheelchair Association	DCC-C18-ISSUE-321
S-00348 - Joe Costello	Stoneybatter Pride of Place	DCC-C18-ISSUE-547
S-00349 - Huntly Lauder		DCC-C18-ISSUE-322
S-00350 - Maurice Glennon		DCC-C18-ISSUE-372
S-00351 - David Gosling		DCC-C18-ISSUE-526
S-00352 - David Corrigan		DCC-C18-ISSUE-504
S-00353 - David Lee		DCC-C18-ISSUE-326
S-00354 - Pdraig Kehoe	Development 8	DCC-C18-ISSUE-324
S-00355 - Maud Hendricks	Outlandish Theatre Platform	DCC-C18-ISSUE-340
S-00356 - Kevin Berney		DCC-C18-ISSUE-325
S-00357 - Jack Sweeney		DCC-C18-ISSUE-331
S-00358 - Antoin Doyle		DCC-C18-ISSUE-332
S-00359 - Keith Craddock	Red Rock Developments	DCC-C18-ISSUE-327
S-00360 - David Lee		DCC-C18-ISSUE-328
S-00361 - Frances Maguire		DCC-C18-ISSUE-516
S-00362 - Sara Lannin		DCC-C18-ISSUE-334
S-00363 - Sean O'Connell		DCC-C18-ISSUE-329
S-00364 - Richard Cummins		DCC-C18-ISSUE-346
S-00365 - Nuala NicGiobuin	Dublin City South CYPSC	DCC-C18-ISSUE-330
S-00366 - Kevin Healion		DCC-C18-ISSUE-414
S-00367 - Jack Sweeney		DCC-C18-ISSUE-345
S-00368 - Michael Wickham Moriarty		DCC-C18-ISSUE-350
S-00369 - Kathy Smurfit	Ailesbury Road Residents Association	DCC-C18-ISSUE-363

S-00370 - Martina Eskdale		DCC-C18-ISSUE-336
S-00371 - Pauline Cadell	BLEND Residents' Association	DCC-C18-ISSUE-341
S-00372 - Paul McMahon	Industrial Heritage Association of Ireland IHA	DCC-C18-ISSUE-358
S-00373 - Leanne Young	Liberties Training Centre	DCC-C18-ISSUE-384
S-00374 - Mark Dinneen	John Taylor Ltd	DCC-C18-ISSUE-370
S-00375 - An Post	Avison Young	DCC-C18-ISSUE-343
S-00376 - Jennifer Boyle	daa plc	DCC-C18-ISSUE-344
S-00377 - Deirdre Lewis		DCC-C18-ISSUE-369
S-00378 - Amy Carey	Solas Project	DCC-C18-ISSUE-590
S-00379 - Edward Crean	National Disability Authority	DCC-C18-ISSUE-405
S-00380 - Cllr Patricia Roe		DCC-C18-ISSUE-625
S-00381 - Seamus Looby		DCC-C18-ISSUE-349
S-00382 - Stephen O'Reilly		DCC-C18-ISSUE-347
S-00383 - Stephen O'Reilly		DCC-C18-ISSUE-348
S-00384 - Susan Collins	Addiction Response Crumlin	DCC-C18-ISSUE-352
S-00385 - Stephen O'Reilly		DCC-C18-ISSUE-356
S-00386 - Lauren Tuite		DCC-C18-ISSUE-586
S-00387 - Robert MacNicholas		DCC-C18-ISSUE-353
S-00388 - Kathleen Redmond		DCC-C18-ISSUE-354
S-00389 - Simon Clear	Simon Clear & Associates	DCC-C18-ISSUE-368
S-00390 - STC Community Group	STC Community Group	DCC-C18-ISSUE-359
S-00391 - Gary Cooper	Landmarque Property Group	DCC-C18-ISSUE-357
S-00392 - Brian Maguire		DCC-C18-ISSUE-503
S-00393 - Lucinda Mac Mahon	Raheny Heritage Society	DCC-C18-ISSUE-364
S-00394 - Brendan Heneghan		DCC-C18-ISSUE-361
S-00395 - Sean O'Neill	Park Developments	DCC-C18-ISSUE-360
S-00396 - Jason McElligott	Marsh's Library	DCC-C18-ISSUE-367
S-00397 - DCC Housing and Community SPC	Dublin City Council	DCC-C18-ISSUE-362
S-00398 - Austin Campbell	Community Organisations and residents Network (CORN)	DCC-C18-ISSUE-365
S-00399 - Grainne Shaffrey	ICOMOS Ireland	DCC-C18-ISSUE-373
S-00400 - Caroline Cowley		DCC-C18-ISSUE-581
S-00401 - Deirdre Kelly		DCC-C18-ISSUE-366
S-00402 - Sean Ward	OPTRA	DCC-C18-ISSUE-375
S-00403 - Daniel Tabb	Freedom Community Group	DCC-C18-ISSUE-380
S-00404 - Niall Duffy		DCC-C18-ISSUE-374
S-00405 - Lis Royle	Codling Wind Park Ltd	DCC-C18-ISSUE-398
S-00406 - Jamestown Industrial Centre H G Ritchie & Co	Jamestown Industrial Centre	DCC-C18-ISSUE-376
S-00407 - James Donlon	Land Development Agency	DCC-C18-ISSUE-378
S-00408 - Grace McRandal	LADRA	DCC-C18-ISSUE-572
S-00409 - Austin Campbell	Robert Emmet CDP	DCC-C18-ISSUE-377

S-00410 - Aidan Jones		DCC-C18-ISSUE-391
S-00411 - Mary Crosbie		DCC-C18-ISSUE-407
S-00412 - M7 EREIP V Irish PropCo Ltd.	M7 EREIP V Irish PropCo Ltd	DCC-C18-ISSUE-382
S-00413 - Christopher Craig		DCC-C18-ISSUE-496
S-00414 - Michael Wall	Upper Leeson Street Residents Association	DCC-C18-ISSUE-385
S-00415 - Eddy Carroll		DCC-C18-ISSUE-388
S-00416 - Laura Holloway	Enterprise Holdings	DCC-C18-ISSUE-529
S-00417 - Andrew Sulley	HSE Environmental Health	DCC-C18-ISSUE-386
S-00418 - Sinead O'Connor		DCC-C18-ISSUE-387
S-00419 - James Moore		DCC-C18-ISSUE-401
S-00420 - Lorraine Mitchell	Tidy Drimnagh	DCC-C18-ISSUE-413
S-00421 - Maria O Reilly		DCC-C18-ISSUE-472
S-00422 - Duncan Robertson		DCC-C18-ISSUE-393
S-00423 - Keith Gavin	Irish Parking Association	DCC-C18-ISSUE-392
S-00424 - Pace Borza	ART - Association of Residents of Terenure	DCC-C18-ISSUE-397
S-00425 - Susan Cummins		DCC-C18-ISSUE-395
S-00426 - Alan Mee		DCC-C18-ISSUE-399
S-00427 - Brooks Timber & Building Supplies.	Brooks Timber & Building Supplies.	DCC-C18-ISSUE-396
S-00428 - Patricia Doolin		DCC-C18-ISSUE-400
S-00429 - Alan Eustace		DCC-C18-ISSUE-418
S-00430 - Patricia Fahey		DCC-C18-ISSUE-587
S-00431 - John Dean		DCC-C18-ISSUE-467
S-00432 - James Moore		DCC-C18-ISSUE-402
S-00433 - Sian Muldowney	Inner City Organisations Network (ICON)	DCC-C18-ISSUE-406
S-00434 - Freddy Walsh		DCC-C18-ISSUE-404
S-00435 - Anthony Haughey		DCC-C18-ISSUE-408
S-00436 - James Dunne	Irish Rail	DCC-C18-ISSUE-451
S-00437 - Deirdre Conroy		DCC-C18-ISSUE-409
S-00438 - Patricia Fahey		DCC-C18-ISSUE-419
S-00439 - Marie Sherlock		DCC-C18-ISSUE-403
S-00440 - Yvonne Jackson	Fáilte Ireland	DCC-C18-ISSUE-412
S-00441 - S Johnson		DCC-C18-ISSUE-424
S-00442 - Dagmar Fischer		DCC-C18-ISSUE-420
S-00443 - Sophie Nicoullaud		DCC-C18-ISSUE-426
S-00444 - Alison Gilliland		DCC-C18-ISSUE-411
S-00445 - Dáire Kelly		DCC-C18-ISSUE-479
S-00446 - Hugh Rainey		DCC-C18-ISSUE-410
S-00447 - Josephine Henry	Dublin City Community Co-op	DCC-C18-ISSUE-421
S-00448 - Donnchadh Woulfe		DCC-C18-ISSUE-456
S-00449 - Rita O'Neill		DCC-C18-ISSUE-481

S-00450 - Emma-Jane Morrissey	Irish Wheelchair Association	DCC-C18-ISSUE-416
S-00451 - Paschal Nee	Green Party Dublin Central Branch	DCC-C18-ISSUE-415
S-00452 - Éilis Ryan	Éilis Ryan	DCC-C18-ISSUE-438
S-00453 - Tom Phillips		DCC-C18-ISSUE-440
S-00454 - Emma Flanagan	Cairn PLC	DCC-C18-ISSUE-417
S-00455 - Terry McGrath		DCC-C18-ISSUE-427
S-00456 - John Ronan	Ronan Group Real Estate	DCC-C18-ISSUE-423
S-00457 - Pauline Byrne		DCC-C18-ISSUE-422
S-00458 - Conor Mullen	Tesco Ireland Limited	DCC-C18-ISSUE-455
S-00459 - Paul Byrne		DCC-C18-ISSUE-431
S-00460 - Christopher Arnold		DCC-C18-ISSUE-468
S-00461 - McGarrell Reilly Group	McGarrell Reilly Group	DCC-C18-ISSUE-425
S-00462 - Cormac McKay		DCC-C18-ISSUE-633
S-00463 - Patrick Collins		DCC-C18-ISSUE-448
S-00464 - U+I Group PLC	U+I Group PLC	DCC-C18-ISSUE-428
S-00465 - Peter Fay		DCC-C18-ISSUE-429
S-00466 - Paul Cleary	IPUT	DCC-C18-ISSUE-437
S-00467 - Pradeep Govender		DCC-C18-ISSUE-442
S-00468 - John Fitzgerald		DCC-C18-ISSUE-434
S-00469 - Jackie Bourke		DCC-C18-ISSUE-513
S-00470 - Cat O'Driscoll		DCC-C18-ISSUE-640
S-00471 - Deirdre Beatty		DCC-C18-ISSUE-433
S-00472 - Heather Gray		DCC-C18-ISSUE-618
S-00473 - Ali Robinson	Ringsend Community Development Group	DCC-C18-ISSUE-435
S-00474 - Colin Boyle		DCC-C18-ISSUE-450
S-00475 - John Seery		DCC-C18-ISSUE-449
S-00476 - Paul Keogh		DCC-C18-ISSUE-445
S-00477 - Sean Duffy	Friends of Medieval Dublin	DCC-C18-ISSUE-441
S-00478 - Karen Murphy	Irish Council for Social Housing	DCC-C18-ISSUE-559
S-00479 - Brian Sherry		DCC-C18-ISSUE-446
S-00480 - Donough Cahill	Irish Georgian Society	DCC-C18-ISSUE-501
S-00481 - Ciaran Duffy		DCC-C18-ISSUE-459
S-00482 - Avison Young	Avison Young	DCC-C18-ISSUE-443
S-00483 - Ravala Limited	Downey Planning	DCC-C18-ISSUE-447
S-00484 - James Kyle		DCC-C18-ISSUE-461
S-00485 - Glen Jenkins	BOC Gases	DCC-C18-ISSUE-521
S-00486 - Tom Phillips		DCC-C18-ISSUE-453
S-00487 - Siobhan Geoghegan	Respect Rialto - an alliance of residents who live in Rialto Street, Cottages, Court & Park	DCC-C18-ISSUE-452
S-00488 - Mark Cullen		DCC-C18-ISSUE-454
S-00489 - Conor Lynch		DCC-C18-ISSUE-598

S-00490 - Siobhan Geoghegan	Respect Rialto - an alliance of residents who live in Rialto Street, Cottages, Court & Park	DCC-C18-ISSUE-460
S-00491 - Sabrina Joyce-Kemper		DCC-C18-ISSUE-502
S-00492 - Anja Murray		DCC-C18-ISSUE-631
S-00493 - Tom Phillips		DCC-C18-ISSUE-458
S-00494 - Mark McGarvey	Chivay Investments Ltd.	DCC-C18-ISSUE-457
S-00495 - Eugene Cunningham	St Brendan's Ladies Gaelic Football Club	DCC-C18-ISSUE-523
S-00496 - Nadette Foley		DCC-C18-ISSUE-489
S-00497 - Michael O'Neill	Gas Networks Ireland	DCC-C18-ISSUE-463
S-00498 - Oisín Murtagh		DCC-C18-ISSUE-573
S-00499 - Tom Phillips		DCC-C18-ISSUE-466
S-00500 - Sharon Bolger Bolger		DCC-C18-ISSUE-464
S-00501 - Susan Sharkey		DCC-C18-ISSUE-470
S-00502 - Will O'Brien	Zipp Mobility	DCC-C18-ISSUE-462
S-00503 - Christine Fitzpatrick		DCC-C18-ISSUE-469
S-00504 - Beibhinn Byrne	The Supernatural food market	DCC-C18-ISSUE-551
S-00505 - Brigid Reilly		DCC-C18-ISSUE-542
S-00506 - Lisa Kenny		DCC-C18-ISSUE-562
S-00507 - Brian Mc Carthy		DCC-C18-ISSUE-494
S-00508 - Harry Browne		DCC-C18-ISSUE-544
S-00509 - Georgina Moore		DCC-C18-ISSUE-477
S-00510 - Janet McKennedy		DCC-C18-ISSUE-471
S-00511 - Pauline Foster	Recorders Residents Association	DCC-C18-ISSUE-475
S-00512 - Kathleen White	South Inner City Community Development Association (SICCDA)	DCC-C18-ISSUE-483
S-00513 - Tom Phillips		DCC-C18-ISSUE-473
S-00514 - David Thomson	Hibernia REIT	DCC-C18-ISSUE-476
S-00515 - Rory Brewster		DCC-C18-ISSUE-615
S-00516 - Louise Reilly		DCC-C18-ISSUE-515
S-00517 - Davey Moor		DCC-C18-ISSUE-474
S-00518 - Christian Quéméner		DCC-C18-ISSUE-493
S-00519 - Grainne Hassett		DCC-C18-ISSUE-482
S-00520 - Tony Grace		DCC-C18-ISSUE-507
S-00521 - Tom Phillips		DCC-C18-ISSUE-478
S-00522 - Michele Ferguson		DCC-C18-ISSUE-604
S-00523 - Hazel Norton		DCC-C18-ISSUE-480
S-00524 - Feljin Jose	Dublin Commuter Coalition	DCC-C18-ISSUE-632
S-00525 - Aideen Leonard		DCC-C18-ISSUE-530
S-00526 - Zoe Obeimhen		DCC-C18-ISSUE-484
S-00527 - Mánas Ó hEochaidh		DCC-C18-ISSUE-486
S-00528 - Grainne Hassett		DCC-C18-ISSUE-497

S-00529 - Griffith College	Griffith College	DCC-C18-ISSUE-540
S-00530 - Patrick Lansley		DCC-C18-ISSUE-524
S-00531 - Vivien O'Riordan		DCC-C18-ISSUE-488
S-00532 - Zoe Obeimhen		DCC-C18-ISSUE-514
S-00533 - Conor Kenny	Clancourt Group	DCC-C18-ISSUE-487
S-00534 - Colm Cummins	Electricity Supply Board	DCC-C18-ISSUE-485
S-00535 - School Street Family Resource Centre	School Street Family Resource Centre	DCC-C18-ISSUE-539
S-00536 - Conor Sheehan		DCC-C18-ISSUE-495
S-00537 - Shane Roberts		DCC-C18-ISSUE-555
S-00538 - Eamon Clery		DCC-C18-ISSUE-490
S-00539 - Catriona Duggan	Irish Architects Declare	DCC-C18-ISSUE-512
S-00540 - Aaron Copeland	A Playful City	DCC-C18-ISSUE-491
S-00541 - Neva Elliott	Music Alliance Ireland	DCC-C18-ISSUE-492
S-00542 - Samir Eldin		DCC-C18-ISSUE-527
S-00543 - Samir Eldin		DCC-C18-ISSUE-498
S-00544 - Corina Fitzsimons	Dogs Trust Ireland	DCC-C18-ISSUE-500
S-00545 - Paul Cassidy	Rehab Group	DCC-C18-ISSUE-506
S-00546 - Gary Long	Petition for moorings on grand & royal canal .	DCC-C18-ISSUE-525
S-00547 - James Mooney	Tribeach Dublin Ltd	DCC-C18-ISSUE-518
S-00548 - Siobhan Geoghegan	Respect Rialto - an alliance of residents who live in Rialto Street, Cottages, Court & Park	DCC-C18-ISSUE-499
S-00549 - Linda Kemple		DCC-C18-ISSUE-509
S-00550 - Joe Costello Declan Meenagh	Dublin Central Labour Party	DCC-C18-ISSUE-614
S-00551 - Stephanie Dickenson		DCC-C18-ISSUE-624
S-00552 - Sam Mays		DCC-C18-ISSUE-535
S-00553 - Marguerite Smith		DCC-C18-ISSUE-582
S-00554 - Grainne Hassett		DCC-C18-ISSUE-511
S-00555 - Niall Bolger		DCC-C18-ISSUE-508
S-00556 - PJ McGrath	McGrath Group	DCC-C18-ISSUE-517
S-00557 - Shane Whelan	Westridge Real Estate	DCC-C18-ISSUE-543
S-00558 - Conor Kenny	Clancourt Group	DCC-C18-ISSUE-510
S-00559 - Graham Hickey	Dublin Civic Trust	DCC-C18-ISSUE-519
S-00560 - Des Gunning		DCC-C18-ISSUE-522
S-00561 - Graham Hickey	Dublin Civic Trust	DCC-C18-ISSUE-531
S-00562 - Niall McElroy	Sandymount and Merrion Residents Association	DCC-C18-ISSUE-549
S-00563 - Platinum Land	Platinum Land Ltd	DCC-C18-ISSUE-528
S-00564 - Eoin Maher		DCC-C18-ISSUE-605
S-00565 - James Howley	Howley Hayes Architects	DCC-C18-ISSUE-557
S-00566 - Amy Ní Mhurchú		DCC-C18-ISSUE-532
S-00567 - Tiernan Mulligan		DCC-C18-ISSUE-593

S-00568 - Phoebe Duvall	An Taisce	DCC-C18-ISSUE-533
S-00569 - Zoe Obeimhen		DCC-C18-ISSUE-548
S-00570 - Jean Martin Deniau	Dublin CAN be Heaven	DCC-C18-ISSUE-536
S-00571 - Dearbhla Quinn		DCC-C18-ISSUE-636
S-00572 - Brian Duggan		DCC-C18-ISSUE-588
S-00573 - Alan Dunne		DCC-C18-ISSUE-541
S-00574 - Gerald O'Halloran		DCC-C18-ISSUE-545
S-00575 - Cllr Naoise O Muiri		DCC-C18-ISSUE-578
S-00576 - Sadhbh Hynes		DCC-C18-ISSUE-534
S-00577 - Stephanie Rowe		DCC-C18-ISSUE-538
S-00578 - Thomas Grey		DCC-C18-ISSUE-595
S-00579 - Gina Murphy	Business Owners & Operators, Merrion Row (BOOMR)	DCC-C18-ISSUE-609
S-00580 - A. Mac Eoin.		DCC-C18-ISSUE-619
S-00581 - Anthony Peto		DCC-C18-ISSUE-546
S-00582 - Cllr. Tina MacVeigh		DCC-C18-ISSUE-564
S-00583 - Mark Cullen	Pallas Projects	DCC-C18-ISSUE-554
S-00584 - Seamus Rice		DCC-C18-ISSUE-560
S-00585 - Fiona Bolger		DCC-C18-ISSUE-565
S-00586 - Ivana Bacik		DCC-C18-ISSUE-563
S-00587 - Uniphar Group Plc	Uniphar Group Plc	DCC-C18-ISSUE-550
S-00588 - HPREF HSQ Investments Ltd	HPREF HSQ Investments Ltd	DCC-C18-ISSUE-639
S-00589 - Zoe Obeimhen		DCC-C18-ISSUE-556
S-00590 - Hugo Fitzpatrick		DCC-C18-ISSUE-577
S-00591 - Carmel O'Connor		DCC-C18-ISSUE-571
S-00592 - Frances Harrison		DCC-C18-ISSUE-599
S-00593 - Ronan Doohan	St Oliver Plunkett Eoghan Ruadh GAA Club	DCC-C18-ISSUE-626
S-00594 - Liam Murray		DCC-C18-ISSUE-553
S-00595 - Rea Lavelle		DCC-C18-ISSUE-608
S-00596 - Mike Clark	Trinity College Dublin	DCC-C18-ISSUE-552
S-00597 - The Abbey Theatre Amharclann na Mainistreach	The Abbey Theatre Amharclann na Mainistreach	DCC-C18-ISSUE-569
S-00598 - Donal Costigan		DCC-C18-ISSUE-566
S-00599 - Ronan Kenny		DCC-C18-ISSUE-580
S-00600 - Alan Hanlon	Department of Education	DCC-C18-ISSUE-583
S-00601 - Cormac Connolly		DCC-C18-ISSUE-561
S-00602 - Tanya Kiang	Gallery of Photography Ireland	DCC-C18-ISSUE-638
S-00603 - Ivanna Chovgan	South West Inner City Network	DCC-C18-ISSUE-575
S-00604 - Hazel Norton		DCC-C18-ISSUE-558
S-00605 - Cillian O'Neill		DCC-C18-ISSUE-611
S-00606 - Liam Dwan	LOKRA	DCC-C18-ISSUE-596
S-00607 - Deirdre Nichol	Clontarf Residents' Association	DCC-C18-ISSUE-567

S-00608 - Susan McCarrick		DCC-C18-ISSUE-601
S-00609 - Conor Cahill		DCC-C18-ISSUE-637
S-00610 - Marian O'Donnell	Dublin Chamber	DCC-C18-ISSUE-576
S-00611 - Neil Cunningham	APCOA	DCC-C18-ISSUE-591
S-00612 - Zoe Obeimhen		DCC-C18-ISSUE-594
S-00613 - Orla Mahon	Google Ireland Ltd.	DCC-C18-ISSUE-568
S-00614 - Frances Dockery		DCC-C18-ISSUE-592
S-00615 - Claire Byrne		DCC-C18-ISSUE-621
S-00616 - James Geoghegan		DCC-C18-ISSUE-630
S-00617 - Deirdre Joyce	Irish Green Building Council	DCC-C18-ISSUE-622
S-00618 - BCP Capital	BCP Capital	DCC-C18-ISSUE-579
S-00619 - Mark Redmond	American Chamber of Commerce Ireland	DCC-C18-ISSUE-613
S-00620 - Marcus Reid	Grand Canal Dock Residents Association	DCC-C18-ISSUE-589
S-00621 - Gareth Brennan	Brennan Furlong Architects	DCC-C18-ISSUE-584
S-00622 - Michael Blaney	BP Development Projects	DCC-C18-ISSUE-585
S-00623 - Brendan Heneghan		DCC-C18-ISSUE-623
S-00624 - Claire Wheeler		DCC-C18-ISSUE-600
S-00625 - Orla McKiernan		DCC-C18-ISSUE-597
S-00626 - Samantha Mc Caffrey		DCC-C18-ISSUE-606
S-00627 - Michael Kenny		DCC-C18-ISSUE-607
S-00628 - Zoe Obeimhen		DCC-C18-ISSUE-612
S-00629 - Helen Moore		DCC-C18-ISSUE-603
S-00630 - Paul McKeon		DCC-C18-ISSUE-610
S-00631 - Tim Lynch		DCC-C18-ISSUE-616
S-00632 - Liam Ryan		DCC-C18-ISSUE-617
S-00633 - Seán Woods	Office of the Planning Regulator	DCC-C18-ISSUE-620
S-00634 - Sunil Sharpe	Give Us The Night	DCC-C18-ISSUE-629
S-00635 - Gareth Brennan	Brennan Furlong Architects	DCC-C18-ISSUE-627
S-00636 - Robert Tobin		DCC-C18-ISSUE-634
S-00637 - Lord Mayor Hazel Chu and Patrick Costello		DCC-C18-ISSUE-635
S-00638 - Cian McMorow	Blacklion Real Estate Fund	DCC-C18-ISSUE-628
S-00639 - Monica McMahon		DCC-C18-ISSUE-641
S-00640 - Diarmuid Breatnach		DCC-C18-ISSUE-642
S-00641 - Alex Gillett		DCC-C18-ISSUE-643
S-00642 - Caitriona Warfield		DCC-C18-ISSUE-644
S-00643 - Conor Dillon		DCC-C18-ISSUE-645
S-00644 - Diormuid & Annette Burke		DCC-C18-ISSUE-646
S-00645 - Eoin Whelan		DCC-C18-ISSUE-647
S-00646 - Irene Sorohan		DCC-C18-ISSUE-648
S-00647 - James Pike		DCC-C18-ISSUE-649

S-00648 - Léon and Ciaran Black		DCC-C18-ISSUE-650
S-00649 - Leon McCarthy		DCC-C18-ISSUE-651
S-00650 - Petria McDonnell		DCC-C18-ISSUE-652
S-00651 - Susan Dawson	Phibsboro' Village Tidy Towns	DCC-C18-ISSUE-653
S-00652 - Paddy Marron	Rathgar Residents Association	DCC-C18-ISSUE-654
S-00653 - Aidan and Jimmy Redmond	Redmonds of Ranelagh	DCC-C18-ISSUE-655
S-00654 - Rhona O'Connor		DCC-C18-ISSUE-656
S-00655 - Neville Raethorne	Supervalu Ranelagh	DCC-C18-ISSUE-657
S-00656 - Tatiana Hurley		DCC-C18-ISSUE-658
S-00657 - Yvonne Allen		DCC-C18-ISSUE-659
S-00658 - Alan Robinson	Docklands Business Forum	DCC-C18-ISSUE-660
S-00659 - Alice Mary Higgins		DCC-C18-ISSUE-661
S-00660 - Ann Moroney		DCC-C18-ISSUE-662
S-00661 - Barry O'Dowd		DCC-C18-ISSUE-663
S-00662 - Bill Phelan		DCC-C18-ISSUE-664
S-00663 - Cllr Carolyn Moore		DCC-C18-ISSUE-665
S-00664 - Donna Cooney		DCC-C18-ISSUE-666
S-00665 - John Sheehan	Irish Life	DCC-C18-ISSUE-667
S-00666 - Connor Rooney	Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media	DCC-C18-ISSUE-668
S-00667 - Donal Cahalane		DCC-C18-ISSUE-669
S-00668 - Dorothee Schmid		DCC-C18-ISSUE-670
S-00669 - Richard Guiney	Dublin Town	DCC-C18-ISSUE-671
S-00670 - Edward Ryan		DCC-C18-ISSUE-672
S-00671 - Frank Bannister		DCC-C18-ISSUE-673
S-00672 - Glenda Cimino		DCC-C18-ISSUE-674
S-00673 - Patty Rogers	Irish Glass Bottle Housing Action Group	DCC-C18-ISSUE-675
S-00674 - Tim Fenn	Irish Hotels Federation	DCC-C18-ISSUE-676
S-00675 - Marion Cashman	Richview Residents Association	DCC-C18-ISSUE-681
S-00676 - Joe Gilligan		DCC-C18-ISSUE-677
S-00677 - John Blake Dillon		DCC-C18-ISSUE-678
S-00678 - Pauline Foster	Metro South West Group	DCC-C18-ISSUE-679
S-00679 - Majella Tarbatt		DCC-C18-ISSUE-680
S-00680 - Michael Ryder		DCC-C18-ISSUE-682
S-00681 - Mick Quinn		DCC-C18-ISSUE-683
S-00682 - Fiona Kelty	NCBI - Working for People with Sight Loss	DCC-C18-ISSUE-684
S-00683 - David Clements	NTA	DCC-C18-ISSUE-685
S-00684 - Niall O'Byrne	Marlet Property Group Limited	DCC-C18-ISSUE-602
S-00685 - Emma-Jane Morrissey	Irish Wheelchair Association	DCC-C18-ISSUE-323
S-00686 - Andy O'Hara	Pavee Point	DCC-C18-ISSUE-686
S-00687 - Siobhan Cuffe	Pembroke Road Association	DCC-C18-ISSUE-687

S-00688 - Raymond Tutty	Union Investment Real Estate GmbH	DCC-C18-ISSUE-688
S-00689 - Robbie Sinnott	Voice of Vision Impairment	DCC-C18-ISSUE-689
S-00690 - Robin Bryan		DCC-C18-ISSUE-690
S-00691 - Sandra Allen		DCC-C18-ISSUE-691
S-00692 - Alison Harvey	The Heritage Council	DCC-C18-ISSUE-692
S-00693 - Odran Reid	TU Dublin	DCC-C18-ISSUE-693
S-00694 - Caitriona Shaffrey		DCC-C18-ISSUE-694
S-00695 - Carmen Neary		DCC-C18-ISSUE-695
S-00696 - Colm and Emir McDonagh		DCC-C18-ISSUE-696
S-00697 - Deirdre Lynskey		DCC-C18-ISSUE-697
S-00698 - Edward Kelly		DCC-C18-ISSUE-698
S-00699 - Erica and Briyan Daltz		DCC-C18-ISSUE-699
S-00700 - Fiona Buckley		DCC-C18-ISSUE-700
S-00701 - Geraldine Ann Cusack		DCC-C18-ISSUE-701
S-00702 - Geraldine O'Connell Cusack		DCC-C18-ISSUE-702
S-00703 - Grace Maguire		DCC-C18-ISSUE-703
S-00704 - Ivan and Anne Durcan		DCC-C18-ISSUE-704
S-00705 - James Wrynn		DCC-C18-ISSUE-705
S-00706 - John Lynskey		DCC-C18-ISSUE-706
S-00707 - John Ryan		DCC-C18-ISSUE-707
S-00708 - Lorraine and Conor Power		DCC-C18-ISSUE-708
S-00709 - M Wallis		DCC-C18-ISSUE-709
S-00710 - Marie Churchill		DCC-C18-ISSUE-710
S-00711 - Mairead Cahill		DCC-C18-ISSUE-711
S-00712 - Marie Osvald Caffrey		DCC-C18-ISSUE-712
S-00713 - Nathaniel Gillett		DCC-C18-ISSUE-713
S-00714 - Nicki Coffee Edward Courtney		DCC-C18-ISSUE-714
S-00715 - Philip Daly	Ranelagh Community Response	DCC-C18-ISSUE-715
S-00716 - Elisabeth Vandenberghe		DCC-C18-ISSUE-716
S-00717 - James Wrynn	Ranelagh Village Improvement Group	DCC-C18-ISSUE-717
S-00718 - Ciaran Ferrie	Rathmines Initiative	DCC-C18-ISSUE-718
S-00719 - Sally Corcoran		DCC-C18-ISSUE-719
S-00720 - Frank McDonald	Temple Bar Residents	DCC-C18-ISSUE-720
S-00721 - Terry Lynskey		DCC-C18-ISSUE-721
S-00722 - Franziska Fabich		DCC-C18-ISSUE-722
S-00723 - Alison Coleman		DCC-C18-ISSUE-723
S-00724 - G M	Glór Mológa	DCC-C18-ISSUE-724

S-00725 - Julian de Spáinn	Conradh na Gaeilge	DCC-C18-ISSUE-725
S-00726 - Cllr Chris Andrews		DCC-C18-ISSUE-726
S-00727 - Cllr Daniel Ceitinn		DCC-C18-ISSUE-727
S-00728 - Donna Cooney	The Lord Mayor's Forum	DCC-C18-ISSUE-728
S-00729 - Donal O'Brolcain		DCC-C18-ISSUE-729
S-00730 - N Hutchinson		DCC-C18-ISSUE-730
S-00731 - Justin Dolan		DCC-C18-ISSUE-731
S-00732 - Marcella Hannon		DCC-C18-ISSUE-732
S-00733 - Ned Coleman		DCC-C18-ISSUE-733
S-00734 - Niall McElwee	St. James's Hospital	DCC-C18-ISSUE-734
S-00735 - Niall O Baoill	The Inchicore Railway Works / Residents Association	DCC-C18-ISSUE-735
S-00736 - Michael Stein	Michael Stein	DCC-C18-ISSUE-736
S-00737 - Brightside Media Ltd	Brightside Media Ltd	DCC-C18-ISSUE-737
S-00738 - Lowstrand Properties Ltd	Lowstrand Properties Ltd	DCC-C18-ISSUE-738
S-00739 - Ilac Centre	Ilac Centre	DCC-C18-ISSUE-739
S-00740 - Killeen Properties	Killeen Properties	DCC-C18-ISSUE-740
S-00741 - Castlethorn and Chartered Land Ltd	Castlethorn and Chartered Land Ltd	DCC-C18-ISSUE-741
S-00742 - Dublin Central General Partnership	Dublin Central General Partnership	DCC-C18-ISSUE-742
S-00743 - Diageo Ireland	Diageo Ireland	DCC-C18-ISSUE-743
S-00744 - Fewcott Company Ltd	Fewcott Company Ltd	DCC-C18-ISSUE-744
S-00745 - Grace Maguire	Tidy towns	DCC-C18-ISSUE-745
S-00746 - Pranash Ramanundh	RIAI	DCC-C18-ISSUE-746
S-00747 - Trevor Sadler	Greybirch Limited	DCC-C18-ISSUE-747
S-00748 - Marion Dempsey		DCC-C18-ISSUE-748
S-00749 - Tracy Geraghty	Dublin City Council Culture Company	DCC-C18-ISSUE-749
S-00750 - John Fitzsimons	St. Andrew's Resource Centre	DCC-C18-ISSUE-750
S-00751 - Paula Russell	Harold's Cross Village Community Council CLG	DCC-C18-ISSUE-751
S-00752 - Jim Brogan	Cumann Luthcleas Gael Coiste Átha Cliath (Dublin GAA County Board)	DCC-C18-ISSUE-752

**Appendix 4 Matters that must be included in a Development Plan,
as well as those matters that may be included.**

1. Set out an overall strategy for the proper planning and sustainable development of the areas of the City Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question.

2. Include a core strategy demonstrating that development objectives in the City Development Plan are consistent with, as far as practicable, national and regional development objectives set out in the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES), and with Specific Planning Policy Requirements (SPPR) specified in planning guidelines.

3. Have regard to the County Development Plans of adjoining Planning Authorities.

4. Include a statement which shows that the development objectives in the City Development Plan are consistent with, as far as practicable, the conservation and protection of the environment.

5. Include objectives for:

a) The zoning of land for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space or otherwise, or a mixture of these uses) where and to such an extent as the proper planning and sustainable development of the area requires these uses to be indicated.

b) The provision, or facilitation of the provision, of infrastructure including:

- Transport, energy and communication facilities,
- Water supplies and waste water services (regard having being had to the water services strategic plan for the area made in accordance with the Water Services Act 2007) (A new water services strategic plan will be prepared by Irish Water in accordance with the Water Services Act 2013),
- Waste recovery and disposal facilities (regard being had to the waste management plan for the area made in accordance with the Waste Management Act 1996), and any ancillary facilities or services.

c) The conservation and protection of the environment including the archaeological and natural heritage and the conservation and protection of European Sites and any other sites which may be prescribed for the purposes of this paragraph.

d) The encouragement, pursuant to Article 10 of the Habitats Directive, of the management of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.

e) The promotion of compliance with environmental standards and objectives established:

- For bodies of surface water, by the European Communities (Surface Water Regulations 2009),
- For Groundwater, by the European Communities (Groundwater) Regulations 2010.

- f) The integration of planning and sustainable development with the social, community and cultural requirements of the area and its population.
- g) The preservation of the character of the landscape where, and to the extent that, in the opinion of the planning authority, the proper planning and sustainable development of the area requires it, including the preservation of views and prospects and the amenities of places and features of natural beauty or interest including views and prospects.
- h) The protection of structures or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.
- i) The preservation of the character of Architectural Conservation Areas.
- j) The renewal of areas identified having regard to the core strategy, that are in need of regeneration.
- k) The provision of accommodation for travellers, and the use of particular areas for that purpose.
- l) The preservation, improvement and extension of amenities and recreational amenities.
- m) The control having regard to the provision of the Major Accidents Directive and any Regulations, under any enactment, giving effect to that Directive of:
- Siting of new establishments,
 - Modification of existing establishments, and
 - Development in the vicinity of such establishments, for the purposes of reducing the risk or limiting the consequences of a major accident.
- n) The provision of, or facilitation of the provision, of services for the community, including schools, crèches and other education and childcare facilities.
- o) The promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to:
- Reduce energy demand in response to the likelihood of increases in energy and other costs due to long term decline in non-renewable resources,
 - Reduce anthropogenic greenhouse emissions, and
 - Address the necessity of adaptation to climate change.
- p) In particular having regard to location, layout and design of new development.
- q) The preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which right of way shall be identified both by marking them on at least one of the maps forming part of the City Development Plan and by indicating their location on a list appended to the City Development Plan.

r) Landscape, in accordance with relevant policies or objectives for the time being of the Government or any Minister of the Government relating to providing a framework for identification, assessment, protection, management and planning of landscape and developed having regard to the European Landscape Convention held in Florence in October 2000.

6. Include a strategy (the Housing Strategy) for ensuring that the proper planning and sustainable development of the City provides for the housing of the existing and future population of the City.

7. Includes policies and proposals for retail development in accordance with any guidelines that relate to retail development.

8. Include a settlement hierarchy and indicate areas for which it is intended to prepare a local area plan.

9. Incorporate an Environment Report resulting from a Strategic Environment Assessment of the plan.

10. There are also additional optional objectives, which may be included in the plan. These are set out in the First Schedule of the Act and include objectives relating to the location and pattern of development, control of areas and structures, community facilities, environment and amenities, infrastructure and transport.

Appendix 5 Statutory Time Frame for the Preparation of the New City Development Plan

Stage	No.	Step	Proposed Date
Pre-Draft	1	Public consultation on the pre-draft development plan (issues paper) starts	15-Dec-20
Pre-Draft	2	Pre-draft development plan consultation close date	22-Feb-21
Pre-Draft	3	Chief executive's report on pre-draft development plan public consultation	19-Apr-21
Pre-Draft	4	Members submit motions	14-May-21
Pre-Draft	5	Directions from elected members to chief executive	28-Jun-21
Pre-Draft	6	Draft development plan issued to members for consideration	20-Sep-21
Pre-Draft	7	Deadline for members to amend the draft development plan	15-Nov-21

Public consultation on the draft development plan commences on the 29th November 2021 and ends on the 18th February 2022.

- **All above dates are indicative and may be subject to change.**

Appendix 6 Glossary of Acronyms

Acronyms

AA: Appropriate Assessment
ABP: An Bord Pleanála
ABTA: Area Based Transport Assessment
ABT: Account Based Ticketing
ACA: Architectural Conservation Area
AFA: Area for Further Assessment (Flooding)
AHB: Approved Housing Body
BER: Building Energy Rating
BID: Business Improvement District
BREEAM: Building Research Establishment Environmental Assessment Method
BRT: Bus Rapid Transit
CARO: Climate Action Regional Office
CCAP: Climate Change Action Plan
CCT: Correlated Colour temperature
CDP: City Development Plan
CEUD: Centre for Excellence in Universal Design
CFRAM: Catchment Flood Risk Assessment and Management
CLCD: Community Led Local Development
CMP: Construction Management Plan
CNG: Compressed Natural Gas
CO₂: Carbon Dioxide
COM
CPO: Compulsory Purchase Order
CSO: Central Statistics Office
CWB: Community Wealth Building
DAA: Dublin Airport Authority
DAP: Drainage Area Plan
DCHG: Department of Culture, Heritage and the Gaeltacht
DART: Dublin Area Rapid Transit
DC: District Centre
DCC: Dublin City Council
DEBP: Dublin Eastern Bypass
DCU: Dublin City University
DES: Department of Education and Skills
DHLGH: Department of Housing, Local Government and Heritage (previously
DHPLG, DHPCLG, DECLG, DEHLG)
DLR: Dún Laoghaire-Rathdown County Council
DMA: Dublin Metropolitan Area
DMURS: Design Manual for Urban Roads and Streets
DTTas: Department of Transport, Tourism and Sport
ECFRAM: Eastern Catchment Flood Risk Assessment and Management Plan
EclA: Ecological Impact Assessment
EIA: Environmental Impact Assessment
EIAR: Environmental Impact Assessment Report
EMRA: Eastern and Midlands Regional Assembly
ENR: Equality and Human Rights Duty
EPA: Environmental Protection Agency
ESB: Electricity Supply Board

ESPN: European Spatial Planning Observation Network
EU: European Union
EV: Electric Vehicle
FCC: Fingal County Council
GAA: Gaelic Athletic Association
GDA: Greater Dublin Area
GHG: Greenhouse gas
GI: Green Infrastructure
GNI: Gas Networks Ireland
GSI: Geological Survey Ireland
GE: Gigawatt
HGV: Heavy Good Vehicle
HNDA: Housing Need and Demand Assessment
HSE: Health Service Executive
IAA: Irish Aviation Authority
ICT: Information and Communications technology
IDA: Industrial Development Authority
IW: Irish Water
IWA: Irish Wheelchair Associations
IWEA: Irish Wind Energy Association
KDC: Key District Centres
LAP: Local Area Plan
LARES: Local Authority Renewable Energy Strategies
LCDC: Local Community Development Committees
LDA: Land Development Agency
LEAD: Leadership in Energy and Environmental Design
LECP: Local Economic and Community Plan
LED: Light Emitting Diode
LEO: Local Enterprise Office
LIHAF: Local Infrastructure Housing Activation Fund
LPG: Liquefied Petroleum Gas
LSSIF: Large Scale Sport Infrastructure Fund
MASP: Metropolitan Area Strategic Plan
NC: Neighbourhood Centre
NDA: National Disability Authority
MUD: Multi-Unit Developments
MUGA: Multi Use Games Area
NC: Neighbourhood Centre
NDP: National Development Plan
NESC: National Economic and Social Council
NHA: Natural Heritage Area
NIR: Natura Input Report
NMPF: National Marine Planning Framework
NPF: National Planning Framework
NPO: National Planning Objective
NPWS: National Parks and Wildlife Service
NSO: National Strategic Outcome
NTA: National Transport Authority
NZEB: Nearly Zero Energy Building
OMC: Operating management Company

OPR: Office of the Planning Regulator
OPW: Office of Public Works
PCMSP: Pilot Coastal Monitoring Survey Programme
PDA: Planning and Development Act, 2000 (as amended)
PFRA: Preliminary Flood Risk Assessment
PPN: Public Participation Network
PV: Photovoltaic
QBC: Quality Bus Corridor
QGasSP: Quantitative Greenhouse Gas Impact Assessment Method for Spatial Planning Policy
RMP: Record of Monuments and Places
ROW: Right of Way
RPO: Regional Policy Objective
RSES: Regional Spatial and Economic Strategy
RSO: Regional Strategic Outcome
RPS: Record of Protected Structures
RTB: Residential Tenancies Board
SAC: Special Area of Conservation
SAAO: Special Area Amenity order
SDCC: South Dublin County Council
SDGs: Sustainable Development Goals
SDZ: Strategic Development Zone
SEA: Strategic Environmental Assessment
SEAI: Sustainable Energy Authority of Ireland
SEC: Sustainable Energy Community
SFRA: Strategic Flood Risk Assessment
SHD: Strategic Housing Development
SPA: Special Protection Area
SPC: Strategic Policy Committee
SPPR: Specific Planning Policy Requirement
S2S: Sutton to Sandycove Cycleway
SSF: Serviced Sites Fund
SUDS: Sustainable Urban Drainage Solutions
TEN-T: Trans European Transport Network
TCD: Trinity College Dublin
The Act: The Planning and development Act, 2000 as amended
TII: Transport Infrastructure Ireland
TUD: Technological University Dublin
UCD: University College Dublin
UD: Universal Design
UN: United Nations
UNESCO: UN Educational, Scientific and Cultural Organisation
URDF: Urban Regeneration and Development Fund
WFD: Water Framework Directive
WWTW: Wastewater Treatment Works

Appendix 7 Your Dublin, Your Voice – Summary of Results

For full executive summary:

<https://www.dublincity.ie/business/economic-development-and-enterprise/economic-development/your-dublin-your-voice>

Familiarity with the concept of the 15 Minute City

- 36% of respondents were familiar with the concept of the 15 minute city and understood what it means.
- Familiarity was higher among male respondents, among those aged under 50 and among DCC area residents. Familiarity with the concept increased with education.

Top Issues Facing Dublin

The Top 5 issues facing Dublin over the next 6 years, as selected by respondents were:

- Housing – 85% selecting.
 - Movement – cycling, public and private transport – 73% selecting.
 - Green spaces and biodiversity – 60% selecting.
 - Climate change – 48% selecting.
 - Culture in the City – 44% selecting.
- Housing and Culture were more likely to be selected as priorities by those aged 18-34.
 - Culture in the City was more likely to be selected as a priority by DCC area residents.
 - Movement increases in importance among respondents as education rises.
 - Movement and Culture were higher in importance among those at work.
 - Housing and Employment were higher priorities among those with lower monthly incomes.
 - Housing, Movement and Culture were more important issues among private renters.
 - Key Water Infrastructure, Retail and Supporting Urban Villages rated as higher priorities among owner-occupiers.

Housing Priorities for Dublin

The Top 4 Housing Priorities for Dublin City over the next 6 years, as selected by respondents were:

- Provision of affordable housing options – 83% selecting.
 - Tackling homelessness – 72% selecting.
 - Provision of social housing – 51% selecting.
 - Provision of higher density housing / increased height of new builds – 34% selecting.
-
- Tackling Homelessness, Choice of Housing Types and Housing for Minority Groups featured more strongly among female respondents.
 - Affordable Housing Options, Tackling Homelessness and Increased Height / Density were popular among under 35s, while Housing for Older People was a more common priority among over 50s.
 - Affordable Housing and Tackling Homelessness were highest among those on lower monthly incomes.
 - Affordable Housing and Increased Height / Density were stronger priorities for private renters.

Transport Priorities for Dublin

The Top 4 Transport Priorities for Dublin City over the next 6 years, as selected by respondents were:

- Metro / Luas expansion – 73% selecting.
 - Improve / better bus services – 70% selecting.
 - More cycle lanes – 61% selecting.
 - Wider footpaths and better facilities for pedestrians – 61% selecting.
-
- Support for e-scooters, e-bikes, shared bike schemes and for cycle lanes was stronger among male respondents.
 - Improve / Better Bus Services and More Cycle Lanes were more popular selections among under 35s.
 - More Cycle Lanes and Wider Footpaths / Pedestrian Facilities had stronger support among DCC area residents compared with residents of the other Dublin local authority areas.
 - Improve / Better Bus Services and More Cycle Lanes were higher priorities for those in employment.
 - Support for More Cycle Lanes and Wider Footpaths / Pedestrian Facilities increased with education.
 - Support for More Cycle Lanes was higher among private renters, while prioritising More Electric Charging Points was higher among owner / occupiers.

Climate Change Priorities for Dublin

The Top 4 Climate Change Priorities for Dublin City over the next 6 years, as selected by respondents were:

- Clean energy – 56% selecting.
 - Reduced use of cars – 55% selecting.
 - More trees – 55% selecting.
 - Waste management – 49% selecting.
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- Water Conservation was a higher priority among female respondents, while Reduced Use of Cars was higher among males.
 - Clean Energy, Reduced Use of Cars, and Green Roofs were all more popular among younger respondents.
 - Reduced Use of Cars was a stronger priority among DCC area residents, while Water Conservation was less of a priority for these respondents compared with residents of other local authority areas.
 - Reduced Use of Cars and Green Roofs were higher priorities among those in employment, while Waste Management and Water Conservation was less of a priority for these respondents.
 - Support for Reduced Use of Cars increased with education, and with disposable income.
 - Support for Reduced Use of Cars was higher among private renters, while owner-occupiers had a higher priority on Water Conservation and Flood Protection / Warning systems.

Sustainable Communities and Neighbourhoods Priorities for Dublin

The Top 4 Sustainable Communities and Neighbourhoods Priorities for Dublin City over the next 6 years, as selected by respondents were:

- Good quality public transport connections – 74% selecting.
 - Parks and open spaces – 71% selecting.
 - Attractive public spaces – 57% selecting.
 - Safety – 45% selecting, tied with Availability of community services – 45% selecting.
-
- Males were more likely than females to prioritise Quality Public Transport Connections, Parks and Open Spaces, and Attractive Public Space. Female respondents placed a higher priority on Safety and Availability of Community Services.
 - Parks & Open Spaces and Community Spaces were higher priorities for under 35s, while Safety was a higher priority for Over 50s.
 - Attractive Public Spaces was a higher priority among DCC area residents.
 - Quality Public Transport Connections was a lower priority to DCC area residents when compared with DLR area residents.
 - Parks and Open Spaces and Attractive Public Spaces were higher priorities among those in employment, while those not in employment placed a higher priority Availability of Community Services than those at work.
 - Availability of Community Services and Community Spaces were higher priorities for those on lower monthly incomes.
 - Quality Public Transport Connections was a higher priority among private renters, while Safety was a high priority among those renting from their local authority.

Any Further Comments or Suggestions on Priorities for Dublin City over the Next 6 Years

When asked for any other comments or suggestions, respondents gave a variety of comments in their own words. The most common themes for these comments were:

- Housing supply / affordable housing / social housing.
- More cultural events / cultural spaces / protect these.
- Less use of cars / less traffic.
- Safety / anti-social behaviour / more Garda presence.
- More / better public transport.
- Cycle lanes / support cycling.
- Cleaner city / environment / more bins.
- Pedestrianise / support pedestrians.
- Support communities / community development.
- Parks / green areas / planting.