SUBMISSION FROM THE DDPA ON THE DRAFT FOR CONSULTATION OF THE DOCUMENT DEVELOPMENT PLANS – GUIDELINES FOR PLANNING AUTHORITIES

1. INTRODUCTION AND EXECUTIVE SUMMARY

The DDPA - Dublin Democratic Planning Alliance – www.ddpa.ie is an alliance of civic society groups such as District 7, Imagine Dundrum, Dynamic Drimnagh and The Rathmines Initiative, to name but a few; over 60 Residents Associations containing 200,000+ citizens; housing and planning specialists; architects, statisticians, academics and social professionals; and individual citizens. We seek to be their voice in planning and the voice of those who need housing.
We attach a list of the residents associations who are allied to us at Appendix1.

We support development that is sustainable, planning that is democratic and housing that is affordable.

We appreciate the opportunity to comment on these proposed guidelines as part of the public consultation process. Without being ungrateful, we note that "consultation" is the lowest level of public participation possible, so we fear that our influence on this process will be very small, or non-existent.

In general, we welcome the updating of the 2007 Guidelines (15 of 2007) to reflect the regulatory and policy changes that have taken place in the interim. It is crucial that this guidance is meaningful and we do not believe that it can be in the context of Section 28.1(c). This is because it is no longer guidance, but mandatory directives, through Specific Planning Policy Requirements. These directives have no place in a guidance document.

We are alarmed at the use of seven SPPRs in this guidance. These Specific Planning Policy Requirements are the antithesis of the overall thrust of Development Planning, ably described by the Minister in his forward as:
"The preparation of a development plan is a significant function of local democracy, through which important choices about the future development of an area are decided and detailed by local communities and their elected city or county councillors."
It is simply not possible to conform to that ideal, where important choices are decided by departmental/ministerial *fiat*, as is the case with Section 28.1(c): "*Without prejudice to the generality of subsection (1), guidelines under that subsection may contain specific planning policy requirements* ***with which planning authorities****, regional assemblies and the Board* ***shall****, in the performance of their functions,* ***comply****."*
You will see how the wording of 28.1(c) renders the development plan process irrelevant to how "*…future development of an area…(*is*)….decided...*"

It is very clear that the definition of "Guidelines" is that they provide guidance. SPPRs are not guidance, they are mandatory directives with which planning authorities "…*must…comply.*" We ask that these SPPRs be removed from the text, as they are not necessary to the guidance contained in the document.

These SPPRs have led to a regime of constantly overturned development plans due to planning authorities that "…*must…comply…*" with the SPPRs. They must grant material contraventions at the stroke of a pen, rather than through the process referred to in the document (paragraph 3.9.1) of Section 34 (6) of the Planning and Development Act 2000. That Section has a very onerous process that respects the integrity of the adopted development plans.

There is more than adequate provision in the Planning Acts for mandatory directives in, amongst others, Sections 27, 29 and 30 – not to mention Sections 12, 13 and 20. There is no need for Section 28 to be anything more than guidance, as it was intended to be. To further bed down the SPPR regime is unconscionable.

We will advert to the precarious legal position of this SPPR system later in the document: suffice to say that the Courts of Justice of the European Union will be considering its legal basis.

When we compare this document to the 2007 Guidelines, the biggest contrast is in the length – 134 pages as against 71. Planning has indeed got more complex, without any apparent benefit, but the extent of references to other drivers of policy and regulation is, in our view, unnecessary. For example, Section 27 of the Act covers RSES and, thereby, the National Planning Framework – there is little need for repetition here.

We ask that you consider our strong views as you proceed to finalising this guidance document – the most important of which is that it should be guidance and not have any Specific Planning Policy Requirements, whach are mandatory directives and which have no place in any guidance document.

Ray Kenny, Marion Cashman, Sebastian Vencken and Robin Mandal, Committee of the DDPA

2. ANALYSIS OF THE DRAFT FOR CONSULTATION

Context.

Section 1 of the document provides a wide overview of the changed context in which development plans are made. Governance has changed with the Local Government reforms of 2014. Time will tell whether those reforms were beneficial. The Regional Assemblies, the NTA, Irish Water, the LDA, the Office of the Planning Regulator and forthcoming directly elected mayors have changed the administration.

The National Planning Framework, RSESs under the Regional Assemblies, MASPs, MATS and LECPs are even more acronyms that are feeding into and off the planning system.

Regulatory changes such as Housing Supply Targets, transposition of EU Directives, SHD legislation and Section 28 Guidelines are noted. Not noted are Housing Demand Needs Assessments or the EIA Directive 2014/52/EU, which is also not noted on page 16, where many of the others are.

It is worth noting that the description of the SHD timelines is incorrect. SHD was not introduced "*from 2017 for a temporary period to 2022*". Introduced in the (Planning and Development (Housing) and Residential Tenancies Act of 2016, it was due to expire on 31st December 2019. Unfortunately, it was extended in 2019 for a further two year period. It has severely damaged both the outcomes of and the trust in the planning system. Such mistakes in its description should be corrected.

In noting the Section 28 Guidelines, the following are mentioned: Flood Risk Management, Sustainable Residential Development (both 2009), Retail Development (2012), Local Area Plans (2013), Apartments (2015-20) and Building Height (2018). No distinction is made between these documents. Crucially, the change from guidance to directive in the latter two headings is not even hinted at.

This fundamental change in the nature of Section 28 Guidelines was brought in in 2015, under Alan Kelly TD in the Planning and Development (Amendment) Act 2015:

2. Section 28 of the Principal Act is amended by inserting the following after subsection (1B):

"(1C) Guidelines to which subsection (1) relates may contain specific planning policy requirements that, notwithstanding subsection (1), are required to be applied by planning authorities and the Board in the performance of their functions."

The short insertion, intended to force planning authorities to reduce apartment standards, has had dramatic impacts on the sustainability of the planning system and the trust of the citizen in that process. It was in the 2015 Apartment Guidelines that the Specific Planning Policy Requirements were first used in the guidance. Since then, there has been a constant attrition of the authority of the development plan by more and more SPPRs, which have allowed for serious material contraventions of development plans.

Alarmingly, the document itself proposes another seven SPPRs, which are totally unnecessary and are entirely at odds with not just the text of the document, but the societal basis of the legitimacy of the development plan system.

This conflation of "Guidance" with "Directive" has undermined the concept of Development Planning as well as the value of "Guidance".

We ask that you stop this disintegration of the integrity of the Planning Acts by decommissioning the SPPRs from the "Guidance" and locate them in their appropriate "Mandatory Directive" sections. Either the document is guidance or it is mandatory – it cannot, and should not, be both.

Having described the changed context, the document concludes that: *"……there is a need for a fundamentally different approach to the preparation and adoption of development plans to that which operated previously to reflect profoundly changed circumstances."*

This opinion is offered without any empiric evidence. The changes are then expanded upon (in 1.3) as the NPF, RSES and Climate Action. The NPF strategy is incorporated in the Regional Assembly RSESs, which are adequately covered by Section 27: *"27. (1) A planning authority shall ensure, when making a development plan or a local area plan, that the plan is consistent with any regional spatial and economic strategy in force for its area."* There is no need to include this in this document.

Similarly, the Climate Action Charter has already been signed by the 31 Local Panning Authorities and is not needed in the document.

In setting the legislative basis for development planning (1.4), the document fails to address the conflict between the adoption of a development plan being a reserved function under Section 12 and the requirement to obey the SPPRs noted in 12.18(b). Further, in the sub-heading of Ministerial Planning Guidelines (page 15), the document makes it very clear that these "Guidelines" are no such thing – they are mandatory directives: *"Accordingly, where SPPRs are stated in this or other statutory guidance documents, they take precedence over any conflicting policies and objectives of existing development plans."* That entirely undermines all the guidance before and after that sentence.

Further on, the document outlines EU Directives that apply to planning policy. The list does not include 2011/92/EU. We assume that the Department are aware of a case in the CJEU, questioning the legality of the SPPRs.

As noted before, these SPPRs undermine all of the intentions to allow for local planning. The question to the CJEU is: *"The third question is: whether art. 2(1) of directive 2011/92/EU has the effect of precluding regard being had by the competent authority in the process of environmental impact assessment to mandatory government policies, in particular those which are not based exclusively on environmental criteria, being policies that define in certain circumstances situations where a grant of permission is not to be ruled out. "* It behoves the Department to carefully consider the implications of what that ruling might be.

We think that Section 10 of the Planning and Development Acts adequately cover the mandatory requirements for development plans and we do not think that adding further mandatory directives (dressed up as 'guidelines') through additional SPPRs is either transparent, necessary or beneficial. It simply further diminishes the role of the citizen against the ideal of subsidiarity, centralising power to the Department and the Minister.

We fully support the guiding principles for quality in plan-making, set out in 1.7 of the document.

Plan Preparation.

We fully support the "…*effective stakeholder engagement.."* and "*…securing local support..*" mentioned in the second paragraph of page 22. How those aims can be achieved while there are SPPRs that supersede that engagement and local support must be addressed, if we are to restore faith and trust in the planning system, which has been lost due to the perfect storm of SPPRs and SHD – and probably the forthcoming LSRD legislation. That is the challenge that must be addressed by all of the stakeholders in the planning system. This draft for consultation could be an ideal opportunity to achieve that restoration of trust.

This aim of effective stakeholder involvement is undermined by the section on Purposeful Public Consultation (2.4). The department will be aware that the lowest form of engagement is "consultation" At the very least, there should be public "participation" in the development plan process. Again, this is meaningless unless S.28.1(c) is repealed. However, we support the use of PPNs, social media and any other methods of engaging the citizens in this process, as outlined in this section of the document.

We also support the descriptions of stakeholder engagement in 2.5 and 2.6 and agree with the criteria for presentation and visual tools.

Plan-Making Process.

We support the stages and timelines shown on page 35. The description of Stage 1 at 3.2 is concise and appropriate.
We also support the description of Stage 2 at 3.3.

However, we fundamentally disagree with the idea of having an "Issues and Options Paper" as yet another discredited SPPR. SPPR DPG 1 is totally unnecessary and further removes power from the periphery (the local) to the centre. We agree with the principle of an "Issues and Options" paper but, as verified by the examples cited on page 38 from Roscommon and Tipperary, it is not necessary to make it the subject of an SPPR. The use of this anti-democratic process must stop.

Similarly, the inclusion of a 'draft core strategy' in the Chief Executive's recommendations is already covered by S.11(4)(d) of the Planning and Development Acts. There is no need for another discredited SPPR here. SPPR DPD 2 should be removed as a directive, leaving the descriptive text as the 'guidance' that it should be.

We support the processes outlined in Stage 3 at 3.4 and its subsequent text.

The processes in Stage 4, relating to Material Alterations are appropriate in our opinion.

The technical process of Adoption in Stage 5 at 3.6 appear logical. Once again, there is no need to insert two more SPPRs into this section, as they are not necessary. The text from them can simply be transposed as other paragraphs on that page (page 45) as guidance. The Planning and Development Acts adequately cover these issues under Sections 12 and 31. Please do not add in another two discredited SPPRs – SPPR DPG 3 and SPPR DPG 4.

For the same reasons, we ask that you remove the reference to *'specific planning policy requirements'* (SPPRs) from 3.8 – Plan Evaluation. These Section 28.1(c) SPPRs must be removed from our legislation to restore trust in the system and to prevent the damaging outcomes that we are witnessing through the SHD and SPPR processes of grossly over-developed schemes which contravene National Policy Objectives and are the problems of the future.

We have no issues with the Variation procedures outlined in 3.9.

The Material Contravention Procedure at 3.9.1 is entirely meaningless in the context of Section 28.1(c) and its SPPRs. Through these SPPRs, the development plan may be materially contravened by the stroke of a pen. There is no need to go through the arduous procedures demanded by Section 34(6) of the Planning and Development Acts. That process is only for the citizen and the elected councillors – it is not required by developers under the SPPR legislation.
On a recent planning application, the SPPRs were used to justify ten (yes, ten) material contraventions to a development plan that will not require any engagement with Section 34(6)!

For us, who are witnessing the destruction of the places in which we live through these SPPRs and Section 28.1(c), we cannot understand how the Department of Housing, Local Government and Heritage is blind to the damage being caused. Inevitably, the alienation of the citizen from the planning process will cause severe problems. These SPPRs render the entire development plan process redundant and we ask that you recognize this fact through reviewing the data on material contraventions granted outside the Section 36(6) process.

Core Strategy.

With the exception of the reference to SPPRs in 4.2 and elsewhere in the entirety of the document, we support the integration of core strategies into development plans, as required by Section 10 of the Planning and Development Acts.

In 4.3, there is a resumé of Policy previously described in Part 1 – Context. The integration of CSO and ESRI data into housing supply needs is welcome as is the Section 28 Guidelines (with no SPPRs!) and the HNDA process. As you might expect, we seek the removal of SPPR DPG 5 in 4.4 as unnecessary. Its text stands adequately on its own and the requirements are set out in Section 10 of the Planning and Development Acts. Otherwise, we generally support the zoning provisions.

The Development Strategies in 4.5 are generally well-considered. We fully support the statement in 4.5.2 stating the Key Considerations: *"In formulating a sustainable settlement strategy for the county or city, a holistic, evidence- based analysis is required which examines a range of interrelated factors."* This statement, by definition, excludes the randomised decision-making produced by the SPPRs. We also support the Key Considerations stated in the document.

One item that we think needs elaboration is the issue of Development Density (page 60). There are many conflicting views on this, but there is general acceptance that we must create communities that are sustainable, which generally means compact. It is part of the DDPA mission statement that we support sustainable communities. The question is as to what are sustainable densities.

The 2009 Guidelines (19 of 2009) and its accompanying Guide attempted to quantify this. It referred to between 15-35 units per hectare for towns and villages; and between 35-70 units per hectare in cities.
The Circular Letter NRUP 02/2021 does little to cast further light on the issue, but does refer to upcoming publication of revised guidance, which will be open to stakeholder consultation (note that it is not "public" consultation, which it should be).

What we in the DDPA are witnessing, due to Section 28.1(c) and its SPPRs, are applications for densities from 150 to 700 units per hectare, many of which are being granted permission. To us, this is entirely unsustainable planning that will lead to appalling outcomes - physically, structurally, socially and mentally – that will undermine

what this document is trying to achieve in terms of proper planning and sustainable development driven by development plans.

As before, we think that the SPPR on page 64 (SPPR DPG 6) is inappropriate and unnecessary and should be removed as an SPPR. There is no reason that the text cannot remain as guidance, as Sections 10(1) and (2) more than adequately cover the three items covered in the proposed SPPR. At the risk of constant repetition, these SPPRs are hugely damaging to the integrity of the planning system; have removed the trust of the citizen from support of it; have alienated many people; have undermined the development plan process; have led to and will lead to poor outcomes for the places we live and for the planet. They must be repealed.

Any directives required at central level can be implemented through the appropriate sections of the Planning and Development Acts, as amended.

Development Plan Objectives.

As stated in the document, these are set out in Section 10 of the Planning and Development Acts. The further guidance on page 64 contradicts all of the aspirations noted before. Some of the headings are blindingly obvious – "*The objective should be relevant and necessary.*" Some are contradictory – "*…be consistent with national policy...and ministerial guidelines.*" Specific reference is made in that paragraph to SPPRs (and in the footnotes, to Section 28.1(c)).

These SPPRs have facilitated the undermining of both national policy and RSESs, in particular NPO 33 and the Core Principles specified in it, which mandates "*…sustainable development at an appropriate scale relative to location.*" None of the permitted developments that have been granted as material contraventions to development plans, using the SPPR mechanism conform to that core principle. Reference in that section of the document to SPPRs should be removed.

Similarly, the paragraph on not addressing other legislative matters is inappropriate in a guidance document. Why should a local planning authority not ask for higher standards than those set by central government? There is no reasonable answer to that question, so that paragraph should be removed as well.

In the paragraph relating to consistency, reference is made to varying standards for private open space, for example. We think that any reduction in private open space requirements should be the so exceptional as to be a rarity, rather than being utilised to maximise the profit on any proposed development.

Nobody could disagree with the "SMART" acronym at 5.3, even if it is a little threadbare by this stage. The crucial element is who provides the evidence. Under the SPPRs, the applicants' agents provide 'evidence' as advocacy. This is not an acceptable method of gathering evidence. Similarly, the 2002 NESC indicators are a little tired.

The 'good' and 'bad' examples of objectives cited on pages 70 and 71 do not, in our opinion, illustrate any meaningful lessons. It also appears to undermine the discretionary objectives which may be included in a development plan.

While we understand the reluctance to encourage Local Area Plans indicated in 5.6, we believe that these plans are critical to the 'buy-in' by locals, the potential for good outcomes and the gathering of evidence-based data on a small area basis. If the CSO can manage its data on a small scale, surely the Department can do that too. This would facilitate Planning Authorities to prepare detailed, well researched plans, based on empiric data.

Sustainable Development and Regeneration.

As an alliance of citizens, we have found it difficult to define what people mean by "sustainable" development (page 74, 6.1). It would be very useful if the Department were to indicate what its definition is. This would add meaning to statements that are based on it.
Our own definition of sustainable includes infrastructure, both physical and social; access for all; social mix and diversity; impacts on climate change; bio-diversity and cultural experience, to name but a few.

We support the guidance on land use zoning until 6.2.3, where there is yet another unnecessary SPPR, undermining all the paragraphs before it. SPPR DPG 7 states the blindingly obvious and it should be a statement of guidance, like any other of the paragraphs in this section. It should not be another discredited SPPR.

As referenced later in the document, sequential development also applies to cities with "*…opportunities for intensification of development at appropriate scales relative to context.*" We agree with this approach. However,

the next paragraph (page 77 6.2.4, last para) mandates new development along high quality public transport corridors, as if these actually existed in our cities. It is very clear to us that public transport in Dublin, for example, is at capacity and, at peak times, is over-crowded and does not work.

Where railways built in Georgian times, painted lines on the road and trams laid out on previously closed Victorian rail lines are argued to be "*..high quality…corridors*.." there can be no logic to promoting development of any kind. Until the physical infrastructure is in place, these aspirations of compact growth along transport nodes and corridors are unworkable.

We support the section on infrastructure from pages 79 to 82.

We support the section on regeneration at 6.4 and planning for compact growth, with the proviso that growth must respect the scale and nature of the location, as demanded by national policy. We do not agree with any definition of compact growth that consists of over-crowding, as is happening now due to the SPPRs. As with "sustainable", we would appreciate a definition from the Department as to what exactly they mean by "compact" growth.

In principle, we support settlement consolidation at 6.4.2 – again provided that it conforms to National Policy Objectives, particularly NPO33.

We support the Vacant Site Levy, coordinated project development and funding supports noted in 6.4.3 and 6.4.4.

Communities and People.

We support this chapter.

Climate Action.

We support the guidance in this chapter. We would like the Department to elaborate on 8.1.4, which relates to compact growth. As we noted above, we would like a clear definition of this term. As stated throughout the document, there is an assumption that it is universally agreed. Until we know what it means, it can never be understood or agreed. It appears to be the opposite of "sprawl", which could be defined as the migration of the wealthy to the suburbs.

There are so many unspoken assumptions about sprawl that is incumbent on the Department to state exactly what it means by the term.

For example, in the third paragraph of 8.1.4, compact growth is offered as an antidote to *"…the prevailing pattern of more dispersed development and the resultant inefficient and carbon heavy commuting patterns."* This statement is not necessarily supported by the facts.

We have seen during the various lockdowns due to Covid-19, that this carbon heavy commuting simply ceased. The impact of the successful forced experiment of 'working from home' has proven that dispersed development does not have to lead to commuting. It would be ironic if many of those who write policy and guidelines were themselves commuters, giving them a jaundiced view of compactness!

If we look logically at the outcome of densification of the centre, what will become of the periphery? Will the suburbs just die in the same way as the centre died when it was hollowed out in the 1960s and 70s? Could the solution to sprawl be simply densification of the existing suburbs?

In this age of climate emergency, should we be facilitating any form of growth in the first place, due to growth's impact on climate? Perhaps the assumption by a planning authority that "…*compact growth as a central tenet of its policy in tackling climate change"* is incorrect. We pose these questions simply to try to understand the intention and implications of the drive for compact growth.

Although we could not find reference to it in the document, we do support the ideal of the 15-minute community. Walking, this gives a radius of about 1.25 kilometres, which gives a land area of some 5 square kilometres. As a general analysis shows, a population of *c.*25,000 people has enough critical mass to support social and physical infrastructure. This indicates an ideal density of 5,000 people per square kilometre. From here, it is an easy step to suggest what 'sustainable' densities might be for communities, be they in cities, towns or suburbs.
We ask the Department to put some flesh on what it considers to be compact growth.

Heritage and Landscape.

We support the guidance in this chapter.

Plan Implementation, Monitoring and Reporting.

We generally support the provisions stated in this chapter and would like to see provision for citizens' feedback into the monitoring and reporting process.

Appendix A and B.

We have no comments to make on the worked example in Appendix A.

In the standardised zoning objectives in Appendix B, we would like to see what classes of development might be permitted in each zoning, and what might be open for consideration. In principle, we would be supportive of a wide interpretation of permitted uses, subject to common sense. The over-use of zoning has not served us as well as we might have expected, so a more flexible interpretation might result in stronger communities with multiple uses of space.

We note that there is not a proposed standard zoning relating to institutional lands, which are a feature of most Irish settlements. We think that these lands do warrant a separate zoning objective for many social reasons, but physically they offer the space to be the lungs and open spaces of our communities.

SUMMARY

We thank the Department for the opportunity to comment on the draft for consultation. We agree with much of it in principle.

Where we disagree with elements of the document, they relate mainly to our experiences at the sharp end of the planning system, viewing the results on the ground in our communities.

It is clear to us that the whole development plan system has been undermined by the conflation of guidance with requirements as a result of the introduction of Section 28.1(c) in the Planning and Development (Amendment) Act 2015. This introduced the specific planning policy requirements with which planning authorities shall comply. So, Section 28 no longer provides guidance but enforces SPPRs.

This SPPR process, driven by the interpretation of their provisions by developers and their agents, have rendered any development plans redundant, because the SPPRs allow for material contraventions of the development plan outside the normal provisions of Section 34 (6) of the Planning and Development Acts. For example, of the 120 most recent SHD applications, there are over 105 material contraventions to development plans, which can be permitted without any normal S.34(6) due process. That is deeply unsatisfactory and calls into question what function development plans have, if they can be contravened so easily.
Further, it puts more power in the centre, contrary to the principles of subsidiarity, upon which all proper planning is based.

The further seven SPPRs proposed in this document must be removed and re-incorporated as guidance, not requirements. As we have noted above, there is more than adequate provision in other Sections of the Planning and Development Acts to incorporate ministerial directives.

We also ask the Department to consider our requests for meaningful definitions of such terms, used throughout the document, as "sustainable", "compact" and "high-quality public transport", to name but three.

We have an opportunity now to renew the development planning system so as to be able to plan properly for the future. We believe that the reinstatement of power away from the centre to the 31 planning authorities is crucial to that project. As we see it, it is the only possible way of restoring the trust of the citizen in the planning system, which has been whittled away by the disastrous processes of SHD and SPPR.

We ask that you listen to our voice.

Ray Kenny, Marion Cashman, Sebastian Vencken and Robin Mandal, 8th October, 2021

APPENDID 1: LIST OF RESIDENTS ASSOCIATIONS ALLIED TO THE DDPA

Eglinton Residents Association
Eglinton Square Residents Association
Richview Residents Association
Rathgar Residents Association
Belgrave Square Residents Association
Rathmines Initiative
South Georgian Core Residents Association
Temple Bar Residents Association
Harold's Cross Community Group
Claireville Road RA
Harolds Cross Road RA
Kenilworth Park RA
Kimmage Road RA
Mount Argus Road & Church Park RA
Mount Drummond & District RA
Parnell Road/Greenmount Lane RA
St Martins Park RA
Westfield Road RA
Wilfred & Casimir Road RA
LOKRA Lower Kimmage Road R A
Pembroke Road Residents Association
Sydney Parade Residents Association
Mount Merrion Residents Association
Hellfire Massey Residents Association
Belgrave Square Monkstown RA
Roebuck RA
Rosemount RA
Taney RA
Annaville/Dundrum Rd RA
Highfield & Westbrook RA
Frankfort Park RA
Mulvey Pk RA
Anglesea Road RA
Ailesbury Raod RA
Tenters RA
Monkstown RA
Back of the Pipes RA
Drimnagh RA
Inchicore Road residents Group
Clonskeagh RA
Recorders Residentss Association
Sandymount and Merrion RA
Ranelagh Village Improvement Group
Clontarf RA
Marino Residents Association
Nth Gt Georges St Preservation Society
Blend Residents Association
The Mountjoy Square Society
District 7
Geraldine Street Residents Association
Berkeley Road Area R A
Phibsborough Village Tidy Towns
Phibsboro RA
Broadstone Basin
Blessington Street Residents Association
Beaumont Residents Association
Shandon RA
Griffith Avenue & District RA
Old Navan Road RA
Lorcan Estate RA
North Port Dwellers
East Wall Community Council