

Development Plan Team
Planning and Property Development Department
Dublin City Council

Dublin 8

12th February 2022

**Re: Public Consultation – Dublin City Development Plan 2022-2028
Submission by the Dublin Democratic Planning Alliance**

Dear Sir / Madam,

The Dublin Democratic Planning Alliance is an alliance supported by more than 65 neighbourhood associations, communities and many individuals across the Dublin area. The alliance bodies include over 200,000 of the citizens of Dublin. We promote housing and development that meets the needs of our society: sustainable and driven by social needs and demands with the participation of the citizen. The Development Plan is central to this.

After seven years of the failure of centralised planning led by the interests of property industry lobby groups, our first objective is that we return to the primacy of development plans. Our website states that objective - that we want a:

“RETURN TO THE DEVELOPMENT PLANS.

Local authority Development Plans enable democratic principles through the involvement of inhabitants and elected representatives. (Set out in the Planning Act 2000). It makes for a successful city, sustainable and coherent growth, appropriate levels of density and green space, infrastructure, affordability and long term strategy. Dublin's development plan is being over-ridden by Ministerial Guidelines. Intended to provide housing faster, they invalidate the voice of local authorities and diminish public participation.

We fully support

- *the re-empowerment of the Development Plans*
- *the development of affordable housing*
- *secure rental in our communities that meets the needs of our citizens*
- *housing which supports existing and new communities*
- *housing which addresses climate change and loss of biodiversity “*

This Draft Development Plan is the first to be made by Dublin City Council in the context of the centralisation of planning power through national policy and Section 28 mandatory Special Planning Policy Requirements (SPPRs). These SPPRs are also contrary to the EU core principle of subsidiarity as well as being at odds with the Aarhus Convention. It is crucial to regaining control from sectoral interests back to the citizens and to the executive functions of the City Council. Its success is crucial to the future of humane development within the City Council Area; for the creation of strengthened communities; for the direction of planned infrastructure; and for securing and improving the key qualities that make Dublin a unique city.

The Draft Dublin City Development Plan 2022-2028 is an enormous undertaking by the City and is probably the most important Plan ever made by Dublin City, given how planning has been so centralised over the life of the previous Plan. It is the last chance for Dublin to wrest control of its development away from the development lobby. It is also the last chance for Dublin to develop in a sustainable fashion, with the scale and nature of future housing provision to be tailored to the size and type of settlement where it is planned to be located.

We thank you for your work in formulating this Plan and we fully support the strategic vision inscribed in the Executive Summary, in particular: *“Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, and vibrant culture. It will also have a diverse, green, and innovation-based economy. Dublin will be a socially inclusive city of urban neighbourhoods”*

Given the complexity and volume of the Draft Development Plan, we will focus on those items to which we think we can make positive contributions, or that we believe should be highlighted.

CHAPTER 1 STRATEGIC CONTEXT AND VISION

- We have no comment on this chapter, other than to note that the HDNA for Dublin City has been carried out and that there is already enough zoned land to meet this need.
- Table 11 and Figure 1 (Appendix 1, p.25) illustrate the truth of the amount of residential permissions granted to the amount of units being constructed – at Q1, 2021, there were 22,972 granted, with only 5,316 under construction.
- Table 13 (Appendix 1, p.27) uses the 2016 Census data, which show that. In 2016, over 35% of residences in Dublin were apartments. This illustrates a much higher proportion than is generally understood.

- Tables 22 and 23 (Appendix 1, pps. 38 and 40) shows a total HDNA Housing Need of 27,219 over the life of the Plan; this contrasts with the ESRI/NPF target of 6,690 per annum from 2017-2031, four years longer than this Plan and five years of the 2016-2022 Plan.
- We draw your attention to these data, so that the public record of the submission shows the exaggerated numbers being narrated by the property industry.
- We believe that it is important to underline the excess capacity of currently zoned land for residential use (of 48,500 units) related to the HNDA figures of 40,150 units required. There is no need for the levels of numbers promoted by the property industry.

CHAPTER 2 CORE STRATEGY

In this Chapter, we ask that you include the core principles of NPO 32 and NPO 33 in Paragraph 2.12, p.51, after NPO 11.

- **The core principles of NPO 32 are: “NATIONAL CORE PRINCIPLES ARE SET OUT TO GUIDE THE DELIVERY OF FUTURE HOUSING, AT EVERY LEVEL OF GOVERNANCE: Ensure a high standard quality of life to future residents as well as environmentally and socially sustainable housing and place- making through integrated planning and consistently excellent design. Allow for choice in housing location, type, tenure and accommodation in responding to need. Prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure. Tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located. (emphasis from DDPA). Integrate housing strategies where settlements straddle boundaries (county and/ or regional). Utilise existing housing stock as a means to meeting future demand.”**
- **NPO 33 states: “Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”**
- We note that Table 2-8 on page 64 sets out the estimated capacities of the SDRAs. These capacities vary between c.50 UPH to c.140 UPH, with an average just below 100 UPH. This conflicts with densities noted elsewhere in the plan and we believe that the densities that are set out in this table are sustainable and should not be exceeded under any circumstances.
- We would like the following added to the paragraph below the table: *“The densities noted above are estimated capacities and are not to be exceeded.”*
- We note the SDRAs and the Key Urban Villages (KUVs), as well as the Village Improvement Plans. We ask that , in Volume 1, Table 2-14, p.77. no. 12 – Ranelagh, be altered to include Donnybrook, as it is contiguous to Ranelagh and should be coherently planned, rather than

the scattergun developments that have been permitted by An Bord Pleanála under the discredited SHD process. Therefore, Area 12 of Table 2-14 would read ***“Ranelagh and Donnybrook”***.

CHAPTER 3 CLIMATE ACTION

- We fully endorse the policies in this chapter. We would like to see one change in the wording of Policy CA4 (p.100). It currently reads: *“Climate Mitigation and Adaptation in Strategic Growth Areas to ensure that new development in strategic growth areas (including Strategic Development and Regeneration Areas) integrates appropriate climate mitigation and adaptation measures”*. We believe that all development should integrate appropriate climate mitigation measures, not just in Strategic Growth Areas.
- We would like this Policy to read: ***“Climate Mitigation and Adaptation to ensure that new development (including Strategic Development and Regeneration Areas as well as in strategic growth areas) integrates appropriate climate mitigation and adaptation measures”***.

CHAPTER 4 SHAPE AND STRUCTURE OF THE CITY

This chapter is crucial for the future quality of the city. We fully support the statement that: *“Opportunities for new development will be required to respect the character of the city by taking account of the intrinsic value of our built heritage, landscape and natural environment.”* We believe that this simple statement is under threat from the powers of central government and we plead with you to ensure that you uphold that respect, in the face of concerted opposition.

- We would like SC5 (p.138) to be altered as follows. It currently reads: *“Urban Design and Architectural Principles o promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.”* We would like this Policy to read: ***“Urban Design and Architectural Principles to promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, and to insist on the highest quality design, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.”***

- Paragraph 4.5.4 puts the demands of Section 28 SPPRs in the context of the Development Plan. To some extent, this is a Pyrrhic victory, as the current process of the applicant for planning permission being able to pay his/her agents to advocate that the SPPR rules apply to their application, irrespective of the requirements of the Development Plan. This is made very clear in a recent Section 34 planning application where the applicants’ agent stated quite baldly that “..However, these requirements have been superseded by the S.28 Ministerial Guidance...”
- Policy SC10 (p.145) – Urban Density – refers to the excellent 2009 Guidance. We ask that a further sentence is inserted in this policy, to clarify what urban densities are appropriate for Dublin. These are much less than the indicative ranges referred to Appendix 3, Table I, p.219, to which we refer below. The sentence is: **“The densities that will be supported for Dublin are those of similar cities such as Copenhagen, Vienna, Stockholm, Amsterdam and Lyon.”**
- We would like to see the last word of the first paragraph of Policy SC11 – Compact Growth (p.145) change from “...which will:” to “.....which **must:**”.
- We ask that you remove the references to SPPRs in Policy SC14 and Policy SC15 (p.148). These SPPRs should be revoked from the planning legislation and, when they are, the references will be anachronisms. They would then read as follows:

SC 14	Building Height Strategy To ensure a strategic approach to building height in the city that accords with Section 28 Guidelines.
SC 15	Building Height Uses To support the development of an adequate mix of uses in proposals for larger scale development which are height or proposing a taller building.

- These issues of height and density are the two most important factors in how the city will be shaped. The Plan must ensure that it determines the agenda and sets the standards, rather than it being left to applicants for permission to decide what should be built. In this regard, Appendix 3, Table 3, Objective 1 (p.230) is central to Dublin’s future. We ask that you change the last word of the first line of Objective one from “should” to “must”. It would then read: *“enhanced density and scale **must:**”*.
- Similarly, Objective 9 (p.234) should also read: *“enhanced density and scale **must:**”*.
- One final issue we have concerns the density ranges described in Appendix 3, Table 1, p.219. We believe that combining the City Centre with the Canal Belt as having the highest density ranges is a mistake. The City Centre is fundamentally different from the Canal Ring. At a minimum, we ask that you change Table 1 as follows: Insert a further category of “Canal Belt”, with a somewhat lower density range to the City Centre and reduce the upper limit of SDRAs. This because SDRAs will generally be in “brownfield” locations and, therefore be surrounded by two to three storey housing.

Location	Net Density Range (units per ha)
City Centre	100-250
Canal Belt	100-200
SDRA	100-200/250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

- We also think that the densities should reflect the numbers given in National Policy – namely 30-45 in outer suburbs and 50+ in inner suburbs. The drift to higher densities, driven by property interests in their planning applications, that are far in excess of those envisaged in national policy will lead to overcrowding in the city.
- Given that the diagram 1, p.221, Appendix 3 shows examples of density at 75 UPH, we would like you to re-look at the figures quoted in the Draft Development Plan. The cities that are most similar to Dublin in terms of population are those that we wish to emulate. Some of these are Vienna, Copenhagen, Stockholm, Helsinki and Amsterdam, to name but a few. Paris is often mentioned, but it is the densest city in the world – more even than Dhakka – and accommodation is miniscule. None of them have higher buildings than around six stories. What they all have is far better infrastructure than Dublin. We should learn from their densities.



The extract from the EU Open Data in Cities Report of 2020 gives some comparisons based on population density, rather on UPH. These UPH densities are easily available. Copenhagen is probably the best comparative city to Dublin. It has net densities of 65 UPH, which results in a population density of 6,900 people per square kilometre. The gross density is lower. That is the population density that Dublin could achieve, without dismantling its quality. That should be stated as the target figure as an overall for the City Development Plan.

- We think that the figures in Appendix 3, Table 1, p.219 are too high and that the table should read:

Location	Net Density Range (units per ha)
City Centre	75-250
Canal Belt	75-200
SDRA	75-200/250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key urban Village	60-120
Former Z6	75-120
Outer Suburbs	60-100

- This reflects the experiences of cities similar to Dublin and gives plenty of scope to provide the increase in housing forecast by national policy, the ESRI and the Dublin City Council HNSA. It would bring our population density from the current 4,800 people per square kilometre up to a level akin to Copenhagen. We will, of course, have to put in place the physical infrastructure to support that increase in population before these targets can be met.

CHAPTER 5 QUALITY HOUSING AND SUSTAINABLE NEIGHBOURHOODS

- Policy QHSN 38 (p.186) favours the city within the canal ring (the Inner City) as a location for BTR (Build To Rent) development. We know that that will not engender sustainable communities within the canal ring in the future. The BTR model is entirely different to the PRS (Private Rental Sector), which has acceptable standards of accommodation. The BTR model, lowers all of the normal standards and is fundamentally flawed. Until central government policy rejects this sub-standard BTR model, Dublin City Council has to make some attempts to control its spread, as it is attempting to do in this Policy. But, making the entire Canal Ring an open season for this poor model will permanently damage the Inner City. We believe that the Policy, as it stands, discriminates against the existing communities within the Canal Ring.
- We ask that the first bullet point – “***Within the Inner City (i.e. within the canal ring)***” should be removed. The other three bullet points cover areas where this poor model might be considered.
- We want to be clear that we do see and support the need for appropriate Private Rental Sector activities as part of the vibrancy of the city, but we are fundamentally opposed to the BTR model, promoted by the property industry, with its lower standards of apartment design.
- We are also concerned that the applicant for permission for a BTR development will prepare the: “*assessment of other permitted BTR developments in the vicinity (3km) of the site to demonstrate that the development would not result in the over- concentration of one housing tenure in a particular area and take into regard the geographical area of the BTR*”. We can assure the Council that no such applicant will submit an assessment confirming that the proposed BTR scheme would result in over-concentration. We have perused many assessments paid for by applicants and have never seen one that indicated anything negative about the application. Dublin City Council should either carry out the assessment itself, or select its choice of an assessor, independent of the applicant.

- We have no further comments or suggestions on any Policies in Chapter 6 – City Economy and Enterprise; Chapter 7 – The City Centre, Urban Villages and Retail; Chapter 8 – Sustainable Movement and Transport; Chapter 9: Sustainable Environmental Infrastructure and Flood Risk; Chapter 10 – Green Infrastructure and Recreation; Chapter 11 – Built Heritage and Archaeology; Chapter 13 - SDRAs; Chapter 14 – Land Use Zoning; Chapter 15 – Development Standards; and Chapter 16: Monitoring and Implementation.

We thank you for the work in putting this draft together and for allowing us to make our comments and recommendations, which we hope that you will find useful.

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