

1. Shaping the city

In preparing this submission I have read closely and agree with many of the core objectives for our city set out in the pre-draft strategy. First and foremost it must be acknowledged that the impact of the Covid crisis has altered the primacy of the city centre, perhaps irrevocably, and as we look to develop a city where people want to live, work and spend their time, we must look beyond the objectives of a liveable city and consider how we ensure Dublin emerges from the pandemic as a *living* city – a place where people *can* live, a place that can be home to vibrant culture and indigenous businesses as well as large multi-nationals; a city that makes space for people, for biodiversity, and for big ideas that will shape a climate-resilient future.

The next Development Plan should aim to enhance the quality of life for all through the provision of high quality housing, enhanced public transport and connectivity and investment in placemaking, public realm, green infrastructure and social and community facilities, but must recognise the destructive impact that the imposition of SHDs has had, and will continue to have on communities. While the last plan recognised the development potential of areas such as the Liberties, we have failed to maximise this development potential for the betterment of the city or that community, with large tracts of land in the Liberties now lost to unsustainable student accommodation and a proliferation of hotels. We must not repeat this mistake in the future, and we must not allow any further development in the Liberties – or anywhere else – unless it comes with ground floor tenants, social infrastructure and community services, and publicly accessible green spaces of good amenity value.

As we consider and review the development potential of other redundant and underutilised lands, we must ensure that comprehensive Local Area Plans help us craft a cohesive vision for integrating new and old communities and creating compact, sustainable neighbourhoods. New government guidelines may prevent us from having height restrictions, but in this plan we should see to develop our own guidelines governing appropriate heights for different neighbourhoods based on impact and accessibility.

Some factors to consider here:

- Providing sustainable, affordable, life-cycle housing should be our priority, developed in a way that builds, not just homes, but communities, and with a focus on social, affordable and cost-rental housing. We must set a percentage cap on built-to-let in any development, ensure a good mix of sizes, from 1-beds to family-sized, build-in the capacity to step up or down to suitably sized accommodation according to life-stage without having to leave a community.
- Dublin is already a compact city, and the Covid crisis has shown us the true value of our urban villages and the local services within. We can and should prioritise the delivery of a 15-minute city model, with all essential amenities – from schools to transport to shops - available within a 15-minute walk, and quality walking and cycling infrastructure to reduce unnecessary car journeys, connect our communities to each other, and eliminate car-dependency.

- We must address the need for mixed-use development in the city centre and in urban villages, bringing people back to our high streets, not just as shoppers or day-trippers, but as residents. We should broaden out the Living City Initiative to incentivise living over the shop, expanding the Special Regeneration Area to encompass the entire area within the canals and take it further to include our urban villages.
- The pandemic has highlighted, not just the amenity value of green spaces, but the health and wellbeing benefits of access to nature. We must prioritise the delivery of high quality, biodiverse, mixed-use green spaces in all new developments and look to protect, enrich and enhance the green spaces we already have. We should set spatial definitions affording every citizen the right to reasonable recreational access to a high quality, accessible green space within 1km of their home; we should set parameters defining the minimum standard of 'high quality'; and we should ensure Dublin meets the European average on the provision of green spaces per capita, including parks and woodlands, roof gardens, community gardens, school allotments, forests.
- We should ensure that even high density housing provides residents with useable, high quality outdoor space like balconies and courtyards. We must stop developing closed or gated communities, and ensure that all new developments have ground floor occupancy that seeks to foster mixed use, open up the building and bring people in, enhance the community and make new developments feel part of the living city around them.
- To encourage sustainable transport we should identify new areas for permanent pedestrianisation, both in the city centre and in our urban villages; expand the Dublin Bikes scheme; and roll out an e-charging network and make provisions for on-street private charging.
- A thriving, living and liveable city must make space for markets and market culture. The next development plan has to enshrine the need for permanent market spaces, north and south of the Liffey.

2. Climate action

In recognising the scale of the challenge we face, climate action must be central to every facet of the next development plan, with mitigation and adaptation strategies baked into the delivery across every pillar and theme. But we must acknowledge also that the climate crisis and the biodiversity crisis go hand in hand. We cannot address one and ignore the other, and indeed many climate-oriented solutions can help halt biodiversity loss and have long-term benefits in terms of climate adaptation.

We must start looking for natural solutions to make Dublin a leader in climate action and improve our climate resilience. Compact, sustainable development is key, along with extensive tree-planting, better tree protection, and the cultivation of biodiverse green and blue spaces. Dublin is well placed to embrace the opportunity in transitioning to a

low-carbon city, and such we should seek to bring about transformative change in where and how we live, how we get around, how we treat water, our response to extreme weather events, and an holistic view to planning that considers not just sustainable development but unsustainable levels of rebuilding over refurbishing/retrofitting.

Some factors to consider here:

- We need to see the value in existing buildings, as it pertains to both built heritage and carbon footprints. With high embedded carbon and emissions created by new developments, planning permission for large scale demolition and reconstruction should be contingent on ensuring the building becomes carbon neutral in its life cycle and applications should include an analysis of build emissions, the carbon footprint of materials used, embedded emissions, and mitigation measures. Planning applications should budget for embodied energy and actively reduce the use of carbon-heavy building materials.
- Climate responsiveness and mitigation should be a core principal informing community development. Vibrant, connected communities with easily accessible amenities, last mile delivery by bike, emission-free zones and pedestrianised areas should be the goal.
- New construction should reach passive house standard, as is the case in Dún Laoghaire-Rathdown, and the principles of passive solar design should be included in all new buildings as a way of greatly reducing heating demands and the future proofing of existing housing stock. Where relevant structures exist - particularly in the case of housing - the retrofit of buildings should be the standard base proposal for review before redevelopment is considered.
- A new zoning should be created to establish low emission zones in town and village centres and around schools, hospitals and key recreational facilities. Emission mitigation measures such as more trees and greenery should be considered to help achieve this.
- Planning decisions must take account of and plan for extreme weather events: cold snaps, heatwaves, flash floods etc. We must embrace the potential of trees to lower the ambient temperature at street level, hold rainfall, and integrate with sustainable urban drainage to prevent flooding. Large scale tree planting must be facilitated and prioritised throughout the city, on all residential streets and in all new developments. Likewise, building standards should mandate for green roofs, living walls and vertical gardens; we should prevent the tarmacking of front gardens; and we should cap the percentage of a front garden which can be paved with a SUDs-friendly surface to ensure that some part of every front garden is returned to nature.
- The city should promote the potential of microgeneration, district heating schemes, and resale of locally generated power back into the grid, giving a return on local investment in renewable energy generation.

- We must promote public transport and active travel throughout all transport and infrastructure planning decisions in order to tackle emissions. To support active travel and pedestrian space, Dublin city should develop and implement a monthly car free day.
- Almost all household waste can be reduced and recycled, and the city must support this objective by tackling waste segregation, making public composters available, making on-street recycling bins more widely available, and reviewing how the city offers textile recycling, in accordance with the government's Waste Action Plan. We should urgently reinstate or introduce public drinking fountains in an effort to reduce the use of plastic bottles of water and reduce plastic waste.

3. Quality Housing and Sustainable Neighbourhoods

According to the Regional Spatial and Economic Strategy, there is a need for: *well-designed, lifetime adaptable, infill and brownfield development close to existing services and facilities, supported by universal design and improved urban amenities, including public spaces and parks as well as direct accessible walking routes is promoted.*

The next development plan must acknowledge how the SHD model is failing to provide on this objective and undermining any attempts at sustainable development on valuable land in the core city centre and its periphery. Rather than address the city's housing crisis, private developers have delivered an oversupply of hotels, student accommodation, 1-bed build-to-lets and co-living, several hundred units of which will arrive in a mid-or-post-pandemic housing market before the market for that type of accommodation has been tested or established. This is nothing short of scandalous.

To achieve the objective of creating "*safe neighbourhoods that suit all sectors of society and people of all ages*", we must also acknowledge a failure by these developments to deliver the social infrastructure which is fundamental to the creation of sustainable, liveable neighbourhoods, despite the 15 minute city being a very achievable goal for a city as compact as Dublin.

Some factors to consider here:

- Developer-led development is failing our city and the accommodation needs of its people. A proliferation of generic, cookie-cutter hotels, apart-hotels, student accommodation and co-living proposals is destroying the fabric of our communities, leaving a terrible legacy for our built heritage, and failing to address the housing needs of our citizens. This must end. The next Development Plan must focus on delivering social, affordable and cost-rental models of housing.
- The next Development Plan must mandate for mixed use development and a variety of property types to prevent overconcentration of any single type of accommodation in any one area. We need Local Area Plans with a focus on affordable, mixed-use developments of life-cycle housing if we are to build sustainable, resilient communities.

- New developments must integrate with the existing community, maintaining or adding to tree-cover, maintaining or adding to public green spaces, and maintaining or adding to community services. New developments should not result in a net biodiversity loss or amenity loss to any area.
- The lessons of Celtic Tiger developments must be learned and new developments should not be approved without pre-existing or concurrent development of walking, cycling and public transport links, with a focus on gender- and disability-proofed safe streets with good lighting, plenty of bike secure parking, and maximum permeability.
- We need greater incentives to encourage development for residential use of vacant space above shops and in older buildings, making the city centre and village centres more attractive places to live with pocket parks, tree planting, increased public seating, enhanced public lighting and public safety, etc. We should expand the Living City Initiative to the canals and beyond, and provide guidance on upgrading and retrofitting.
- The city should make available a percentage of land available for self-build co-operative housing projects, and consider creating a new zoning to ensure an adequate supply of land for this kind of sustainable development.

4. The City Economy

Dublin City must have a broader economic outlook than that outlined in the pre-draft strategy. The city is currently facing many more economic challenges than housing shortages and unaffordable rents, and among other issues the switch to a circular economy should underpin our economic planning with our climate objectives in mind.

The next Development Plan should align the city's economic activity with our climate and biodiversity goals and ensure that the city operates within our natural, planetary boundaries. Dublin should follow the lead of Amsterdam and become a "doughnut city" by embracing the theories of "doughnut economics" and bringing all of Dublin's citizens inside the doughnut. We should commit to offering everyone access to a good quality of life and pursue a model of economic development that is not contingent on unsustainable growth.

The pre-draft strategy asks: *How can Dublin maintain and enhance its attractiveness as a place to live work, visit and invest in?*

Some factors to consider here:

- We should think local rather than orienting the city's economic development towards tourists. Celebrate the local, celebrate what's unique about Dublin, celebrate Irish design, craft, and artisan vendors, and by default you will create a tourist experience that is unique to Dublin, while supporting our arts and culture sectors, independent retailers and SMEs. We can celebrate the best the city has to offer with food trails, fashion trails, art trails, etc.

- We should support the ingenuity of our creative industries and look to how they reinvigorated our communities during the recession. Empty buildings became artist's studios, markets, pop-up theatres and rehearsal spaces; bringing people into communities and in turn supporting coffee shops and local businesses. When the property market recovered, these pop up spaces were pushed out – the new Development Plan must find a way to support them and draw them back in, building studios and work spaces for the creative community, recognising their social and economic contributions and value.
- We can develop multi-purpose accessible venues to accommodate both day time and night time cultural and creative activities such as markets and events, and ensure that affordable space in our city is provided for artisan producers, craftspeople, Irish fashion designers and other makers and independent retailers.
- We must promote the night-time economy with an elected Night Mayor and licensing laws in line with other European cities.
- In this plan, we should strengthen our commitment to making Dublin a circular city. We can support local movements like Repair Cafés which help people to repair broken or damaged items rather than discard them, both with pop-up café events and internet resources, and ensure that every Dublin City library has sewing machines. We can introduce community composters and expand the reach of our on-street recycling bins, and support businesses to reduce the amount of waste they generate. We can ensure that flea markets have spaces to operate within the city to expand the lifecycle of consumer goods.
- We should consider the benefits of the social economy and make provisions for 'third places', social enterprises, and community projects that foster social inclusion.
- We should create two permanent, landmark markets spaces, one on the northside and one on the southside, and identify and secure additional spaces to support and develop a thriving market culture for the city.

5. The city, urban villages, retail.

If the Development Plan is to support the primacy of the city centre and secure its position as the region's premier shopping destination, it must support the development of experiential retail which cannot be replicated or replaced by shopping online. Markets, Irish design experiences, Irish food or fashion trails could be just as enticing for locals as for tourists. This is a critical time for retail - the migration to online shopping, plus the impact of Covid, plus the death of the high street could leave the city unable to find tenants for a number of landmark or flagship retail premises, and this Development Plan must consider potential uses for these high rent, high spec premises going forward.

By contrast, the Covid crisis has lead people to rediscover their local area and local services, but many small, local businesses will not survive the impact of this third lockdown. A focus

on creating a 15-minute city, where everyone lives within a 15 minute walk of vital services and amenities will help our urban villages to thrive, and more broadly, public realm improvements, pedestrianisation, car-free days, safe cycle parking and outdoor seating can all draw people back into towns, villages and the city centre, as a place to meet, walk, enjoy, and spend time.

For clean air and safer streets we should consider making the city centre a last-mile delivery zone after 10am, and ensure better uptake on the Living City Initiative to encourage people to live above the shop. As previously mentioned, we should extend this scheme to the entire area within the canals and into our urban villages.

6. Sustainable movement and transport

To encourage people to choose sustainable modes of transport, such as walking, cycling and public transport, the next Development Plan has to focus on making these the most attractive and convenient means of getting around. By facilitating those who can to walk, wheel, cycle or take public transport, we free up road space for those for whom a private car journey is the only viable option.

The Development Plan should include ambitious targets for reducing unnecessary car journeys, eliminating car dependency, and reclaiming or reallocating public space away from private cars and towards sustainable, active travel and recreation, amenity or other public uses.

This aligns closely with the Department of Transport's policy approach to achieving a greener transport sector, known as the Avoid-Shift-Improve principle - recognised internationally as a best practice approach in this area. The Department has published a discussion papers examining the suite of climate mitigation measures already in place, along with and the potential role of new measures to avoid, shift or improve emissions through 1) reducing the frequency and distance of trips; 2) shifting towards more environmentally friendly modes of transport, such as walking, cycling or using public transport; and 3) promoting efficient fuel and vehicle technologies.

To this end, we should:

- Improve healthy travel to and from schools by prioritising better cycle and pedestrian access to schools in urban areas and villages, and take these into account in planning future housing and school locations. We should strongly support the Green Flag and "cycle bus" initiatives that support students choosing healthy and ecologically friendly transport to school.
- Work with local communities to create healthier environments around "school zones" by moving car drop off points to a safe distance.
- Introduce a requirement for night-time and early-morning business deliveries, to reduce road congestion during peak commuting hours.

- Provide well-lit, secure, sheltered waiting spaces to all public transport hubs.
- Improve enforcement of illegal parking on footpaths, on cycle tracks and in bus lanes with a visible presence of traffic wardens.
- Expand the Dublin Bikes scheme out into the suburbs and urban villages.
- Increase the provision of safe, covered bicycle parking, in particular focusing on the rollout of “bike bunkers” so that cyclists with limited residential or garden space have access to secure bicycle parking; reduce the cost of renting a bike space so that an annual bike space is equivalent to the cost of an annual residential parking pass; reallocate on-street car parking to ensure that every residential street that provides on-street parking has at least one car parking space dedicated to the storage of bicycles.
- Create an accessibility plan for the implementation of the United Nations Convention on the Rights of Persons with Disabilities, developing a programme of *street uncluttering*, amalgamating or removing unnecessary poles and consolidating other superfluous street furniture for the benefit of the public realm and all that use it. Remove other impediments to access, such as kissing gates on parks, greenways and canals.
- Reject applications for unnecessary street clutter, such as digital ad displays.
- Prioritise pedestrians and the most vulnerable street-users with permeability of streets and pedestrian-friendly crossings, eliminating ‘beg buttons’ and bringing back zebra crossings.
- Lower the default speed limit for the city to 30kmph.
- Build the city’s electric vehicle charging network and provide capacity and guidelines for the on-street charging of EVs.

7. Green infrastructure, open space, recreation and natural heritage

As a nation, we have never been more reliant on local amenities and green spaces than in the last year of grappling with Covid restrictions. Prior to this, there are many people who would never have given much thought to how reliant we are on green infrastructure for health, happiness and general well-being. Good quality, biodiverse green and blue spaces are vital for a healthy, living and liveable city, but we are losing biodiversity at an unprecedented rate.

This Development Plan must seek to reverse that with an ambitious strategy of ecological enhancement across existing green spaces, and a commitment to the provision of further, biodiverse green spaces for the people of Dublin to enjoy. We can build on the work already underway by our parks department, assigning more areas for pollinator-friendly bulb and wildflower planting, more areas for woodlands, wetlands, hedges and other habitats, and

more dog wardens to help keep our parks and public spaces free from the scourge of dog fouling. We can acknowledge the less visible but no less intrinsic biodiversity value of habitats like playing fields and golf courses that provide feeding grounds for Brent geese each winter, or our canals and waterways and the wildlife they support, and ensure that this is protected and upheld with the same vigour as other green spaces.

Some factors to consider here:

- It should be the right of every citizen to have reasonable recreational access to accessible green space. Dublin City Council should commit across all areas of the city to meet the European average on the provision of green spaces per capita, and developers should be mandated to provide green space that meets this target by means including roof gardens, green roofs, vertical gardens, courtyards, community gardens, school allotments, parks or forests.
- We should look to address the over-supply in some areas of low-quality green spaces by setting minimum qualifying standards for the amenity and biodiversity value of a green space, so instead of vast open greens dotted around housing estates, each one must have a railing or low wall, a path through the middle, a certain amount of tree cover per sq meterage, a certain amount of seating per sq meterage, a play area, a 'teen space', and a defined amount of planting. These standards could be applied to the provision of new green spaces by developers, to ensure that those spaces have value to residents and communities.
- We must commit to increasing the city's tree canopy, undertaking an ambitious programme of tree planting and an aggressive approach to protecting the trees we have. We should end our reliance on planters as quick fix biodiversity boosts and instead look at reallocating on-street parking to tree planting in pits containing mixed planting schemes and integrated seating – a pocket park approach that will give us biodiversity hotspots, connecting corridors of nature through our streets, and offering sustainable drainage and places where people can relax, rest and enjoy some shade.
- Following the lead of South Dublin County Council, who will plant 10,000 trees this year, we should radically improve the city's tree count by identifying suitable locations for 'pocket forests'.
- Along with traditional recreational green spaces, we must make space for community gardens and allotments, so more people can enjoy growing as a hobby, as a means of self-sufficiency, or simply as a way to mix and enjoy the outdoors.
- Green infrastructure must be accompanied by the social infrastructure that will enable people of all ages and abilities to enjoy it and to leave no trace. Every park should have water fountains to reduce the need for single use plastics and cut down on litter, and we need public toilets so people can enjoy our outdoor spaces with dignity.

- We should consider development in the context of 'net loss' or 'net gain' to biodiversity, as was the case with the Poddle FAS planning application, which measured the impact on biodiversity in terms of net loss and net gain, and developed an ecological enhancement plan that resulted in a net gain for biodiversity – a similar approach requiring all planning applicants to demonstrate how their development will lead to a net gain for biodiversity would be welcome.
- We must recognise the importance of residential gardens to the overall biodiversity of the city and the role our gardens play in providing a biodiversity corridor through urban areas for birds, insects and wildlife. We should consider a cap on the percentage of a garden that can be tarmacked or paved.
- The challenges of enriching a highly urbanised landscape notwithstanding, we must work to build a strong biodiversity network through the city, looking to Fingal County Council's Development Plan as a guide, and perhaps using our existing network of canals, rivers and waterways to begin a programme of providing continuous coverage and nourishing valuable habitats for a variety of wildlife and insects. We must secure a commitment from Waterways Ireland that they will work closely with DCC towards achieving this shared objective and create 'buffer zones' in and around the canals and waterways to grow this habitat and connect it to on-street planting schemes, pocket forests and other biodiverse green spaces.

9. Culture

The cultural focus of our Development Plan must as much focus on maintaining and providing cultural attractions for residents of the city as it does for visitors and tourists.

As outlined in previous chapters, we need to accommodate artists living and working in the city, provide affordable cultural, community, town hall, auditorium and rehearsal spaces for events of all sizes, from niche to large-scale, consider art trails, Biennales and less mainstream musical festivals, and we should take maximum advantage of Government funding to allow local authorities to reimagine outdoor spaces for cultural use.

We must recognise also the value of our night time economy and afford clubbing its recognition as a legitimate form of culture, deserving of platforming and showcasing. We can capitalise on the unique heritage of our city's electronic music scene and the role of the Night time economy.

We need to invest in creativity, community arts spaces, venues for niche events that are not reliant on alcohol sales.