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Leinster House  
Kildare Street  
Dublin 2

22nd February 2021

Dear Sir/Madam,

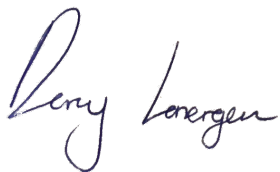
Please find below a submission from the Dublin Central Branch of the Green Party. We are happy to have had the opportunity to provide input to the construction of the Development Plan given how central it is to how the city tackles many of the challenges we face.

We look forward to seeing the ideas below addressed in the plan.

Kind Regards,



Neasa Hourigan TD, Dublin Central    Cllr. Janet Horner, North Inner City



Cllr. Darcy Lonergan,  
Cabra-Glasnevin

On behalf of the Dublin Central Green Party branch

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# Green Party Dublin Central Branch Submission

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## Underpinning the plan

Dublin City Council and/or the state have signed up a number of existing agreements which should underpin the plan and be explicitly referenced from the plan.

Paris Agreement and the UN Sustainable Development Goals.

The Development Plan needs to reflect the ambitions of the Paris Agreement and the Sustainable Development Goals. The timeframe of the Development Plan overlaps significantly with the time required to reach these ambitious targets.

We suggest that the 17 sustainable development goals should underpin the Development Plan and each section of the Development Plan should include means of measuring our progress towards implementation: <https://sdgs.un.org/goals>.

We are also signed up to the BreatheLife and the Climate Brave initiatives - these ambitions should be centrally reflected in the plan.

Equality

The draft plan should be accompanied by an equality audit according to the process set out in the IHREC legislation.

Dublin is signed up to the Council of Europe's Intercultural Cities programme and the UN's safe cities for women campaign. These ambitions should be reflected in the Development Plan.

Results from the previous Development Plan

The draft plan should be accompanied by a report on progress towards implementation of the objectives of the previous Development Plan. This will allow us to more meaningfully build on and address any short-comings in the previous Development Plan.

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# 1. Shaping the City

How our city will grow and develop.

SDG Target 11.3: By 2030, enhance inclusive and sustainable urbanization and capacity for participatory, integrated and sustainable human settlement planning and management in all countries

Higher Density

We support the move to higher density where:

- The right infrastructure is in place
- There is a proportionate access to Green Space within walking distance of every development
- Accommodation suitable for families, older people and the disabled - developments should not target a single cohort

Oversupply and distribution of non-residential space

The city has an oversupply of offices - particularly given the likely increase in working from home in years to come. To ensure that there is not further development of unsustainable offices, we need to distinguish offices from other forms of commercial activity in the plan.

The plan should explicitly aim to move jobs, especially offices, to the suburbs, in support of an urban village and town centre approach to development. Each Local Authority should inventory the amount of (used & unused) office, retail and commercial floor space it has, and where, and compare it against the number of residents, so it is clear where development needs to go to develop a balanced city

Consideration needs to be given to inefficient/unsustainable land use by the state in the city centre. Bus depots, fire brigade maintenance, potentially even army barracks all need to be considered as candidates for relocation.

Support more over the shop living and more animation of the unused upper floor spaces in the city centre.

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### Intergenerational spaces

The plan needs to provide for intergenerational spaces throughout the city, providing for the needs and enjoyment of people at all stages of their lives and allowing for shared space for all generations.

### Respond to the voices of residents

The city must ensure that all residents of the city are listened to in order to inform development.

- Consultation processes around developments should incorporate the voices and perspectives of children and ensure people from minority and marginalised backgrounds have access to consultations in appropriate languages and forums.
- The plan needs to recognise that specific capabilities are required to engage effectively in disadvantaged communities, there is no “one size fits all” consultation method.
- Trials of transport and public space should be supported beyond just the beta project
- Universal accessibility should be prioritised in relation to public space and public engagement. Particularly when considering the role of technology in the city - which can be exclusionary to those with lower tech-literacy skills.

## 2. Climate Action

Protecting our city against pollution, flooding and other climate risks.

SDG Target 11.6: By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.

The adverse results of inaction of climate, flood and pollution risks are arguable already being felt by the residents of Dublin City: for example East Wall and points along Tolka have seen floods that now makes home insurance difficult to obtain - flood projections for the future in these areas are not comforting<sup>1</sup>; air quality in Dublin City has at points returned to the poor levels of thirty years ago<sup>2</sup> and exceeded EU safety limits.



Potential flooding areas in Dublin projected by 2100

- Climate action needs to be mainstreamed throughout the plan and every aspect of the city's development needs to be in line with our high level of ambition for emissions reductions. All material planning should be accompanied by an assessment of impact on emissions, including consideration of embodied energy and emissions.
- The city should increase its monitoring of air quality and set targets for improvement and focusing on school gates and other air quality black spots - which all developments should adhere to.
- Promote low emission zones around schools, or impose zones when air quality levels drop below agreed limits

<sup>1</sup> Potential flooding areas in Dublin projected by 2100 (Published: 26 September 2019) <https://www.gsi.ie/en-ie/events-and-news/news/Pages/Potential-flooding-areas-in-Dublin-projected-by-2100.aspx>

<sup>2</sup>

<https://www.irishtimes.com/news/ireland/irish-news/bad-air-day-pollution-in-dublin-reaches-levels-of-smoky-coal-era-30-years-ago-1.4423929>

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- Promote and support simple, but effective and measurable, emission reduction projects by existing public and private organisations and residents associations. Share ideas among similar groups.

### **3. Quality Housing and Sustainable Neighbourhoods**

Providing quality housing and sustainable neighbourhoods.

SDG Target 11.1: By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums

#### **Residential communities that serve a mix of uses**

The Development Plan needs to explicitly mandate that residential areas would accommodate a mix of uses.

Based on recent applications there seems to be a preference for developers to opt for build-to-rent apartments. We recognise that private rental will always play a part in the housing mix. That said, it seems that entire swathes of land are being converted to build to rent (e.g. Clonliffe College site is expected to be 1,700 build-to-rent units). Given the immaturity of the rental market in Ireland (relative to some European cities) rental is unlikely to be an attractive option for families, the elderly, etc. As such these areas are unlikely to form long lasting, tightly knit, resilient communities. Our view is that the Development Plan needs to mandate a mix of property types in a given area to prevent overconcentration of any given type of accommodation.

Similarly with unit size mix there have been a number of applications that contained an excessive amount of one bed or studio apartments. We recognise the increased need for single units over what is in the current Development Plan. But for the same reasons as above we don't think that any one area should have an overconcentration of one bed or studio apartments.

Finally it is our opinion that the plan should encourage the conversion of houses in areas where there is a lack of housing diversity, and large numbers of empty nesters similar to the Abhaile Project<sup>3</sup>. Potentially this

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<sup>3</sup> <https://www.avahousing.ie/>



could be used to build up public housing stock by buying old houses, make them energy efficient, and converting them into upstairs/downstairs apartments for retirees and young people.

## Standards for bicycle parking

There are a number of issues that need to be addressed with the standards for bicycle parking as outlined in section “16.39 Cycle Parking” of the current plan. It is clear there is a greater desire to encourage more people to cycle in the city. The city also has data available on cycling patterns that should inform the parking requirements.

Land-Use	Zone	Cycle Spaces
<b>Enterprise and employment</b>	1 and 2 3	1 per 100 sq.m 1 per 150 sq.m
<b>Shops and Main Street Financial Offices</b>	1 and 2 3	1 per 150 sq.m 1 per 200 sq.m
<b>Residential (houses and apartments)</b>	All zones	1 per unit <i>(Additional requirements for larger units and visitor parking will be decided on a case by case basis)</i>
<b>Hotels</b>	1	Under 50 bedrooms – 1 per 6 bedrooms

Table 16.2 from Dublin City Development Plan 2016–2022

There are a number of points we feel need to be addressed:

- In general the numbers in table 16.2 of the current plan need to be reviewed with respect to data available and our desire to increase active travel rates.
- Current guidelines for residential of 1 space per unit with decisions being made on a case by case basis for large units is, in our view, too vague. Guidelines should be based on expected unit occupancy with an eye to family units where occupancy would typically exceed the number of bedrooms.
- Developers have in the past opted to meet their 1 space per unit requirement by allocating a space within the property boundary even where there is no rear access to the property's garden (see the Grace Park Wood development in Drumcondra as an example). The space per unit needs to be practical in terms of access e.g. it is not practical for people to walk bicycles through their house for access.
- Accommodations should be made for cargo bike and family bike parking especially at retail outlets
- Shared cycle parking in developments should, where practical, be covered and be secure.

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## Other Suggestions

- The plan should espouse the ideas of the 15 minute city<sup>4</sup>
- Green spaces within short walking distance of residential developments, including accessible play facilities and sports amenities.
- Public space requirements attached to developments need to support permeability for walking and cycling.
- Access to some outdoor space to allow things like planting should be possible for every unit.
- Childcare and older people's accommodation should be prioritised to support a caring economy and an ageing population and to support those balancing caring responsibilities.
- Universal Design and accessibility to be prioritised in new builds and in maintenance and upgrade of the public realm.
- More dog parks or longer hours for 'off lead' times to ensure safe exercise areas are provided for dog-averse residents.
- Promote projects to significantly reduce water usage and wastage in the city - rainwater harvesting, repairing of distribution leaks etc.)
- Ensure schools and other education institutions are built in the centre of communities and can be accessed without driving.
- Ensure education buildings are used to their full capacity to benefit the community, including at weekends and during school holidays.

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<sup>4</sup> <https://www.15minutecity.com/>

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## 4. The City Economy

Sharing the benefits across all communities.

- Scale up Public Sector Duty Projects
- Subject all transport, public realm and housing plans to equality auditing and accompany all planning assessments with the audit report
- Last Mile Delivery hubs should be established and rolled out
- Attach social indicators and targets to projects e.g. ensure construction projects in the city are used to upskill and employ local people.
- Suburban neighbourhoods should specialise more (e.g. focus a lot of creative supports such as workshops, theatres in one area, make another area a tech hub, etc) to give them a more distinct character and help develop tourism more sustainably so that the city centre is not the only draw.

### Markets

Markets differ significantly from standard retail outlets. Markets provide a strong community focal point, a place for communities to meet outside of more formal social settings. They provide a real opportunity for people to trial and/or



operate small businesses. Markets can provide a more direct route to consumers for local producers an option not generally afforded by the big multiple retail outlets. They can provide an opportunity for more specialist retailing e.g. Dublin Flea Market with its focus on second hand goods

The plan needs to:

- Provide spaces for indoor markets that are not weather dependent.
- Ensure that markets are developed primarily for the residents of Dublin as opposed to primarily as a tourist attraction.

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- Put in place a plan for the basic renovation of Dublin Fruit and Vegetable Market that will make the market accessible to a wide range of vendors, particularly residents from the immediate surrounds of the market
  - Ensure that Development Plans, especially where redevelopment has of an area has been mooted, do not unduly discommode existing markets (e.g. Honest2Goodness market and the potential redevelopment/rezoning of Glasnevin Industrial Estate)
  - Specifically, support the work for the Moore Street Advisory Group and ensure that Moore Street continues to operate as a market - please see the Green Party Vision for Moore Street which has been submitted separately
  - Support the revival of Smithfield Square for market use.

## 5. Sustainable Movement and Transport

Promoting and using more environmentally friendly transport options.

SDG Target 11.2: By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons

Hierarchy of road users

- Mainstream hierarchy of road users (i.e. vulnerable pedestrians and pedestrians will take priority, followed by cyclists and public transport with private vehicles coming last) across all of DCC transports work

Accessible for all

- All designs should be disability proofed
- Establish a free city centre public transport service for the mobility impaired. Similar to the Kavalir service in Ljubljana<sup>5</sup> - electric golf-like

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<https://www.visitljubljana.com/en/visitors/travel-information/getting-around/kavalir-getting-around-the-city-centre-by-electric-car/>

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carts for 6-8 people that can be hailed, or booked by app or phone. These could go on roads or drive on pedestrianised streets.

- An evaluation of the state of footpaths and tactile paving should be conducted for the city and a maintenance programme developed
- Remove unnecessary street clutter and sink street clutter underground where possible to support walkability. No new street clutter should be added unless absolutely necessary.
- Lighting needs to be focused on illuminating footpaths and cycle lanes - and tested for disability access - rather than solely carriageways

#### Walking and cycling

- Wider footpaths and pedestrian prioritisation at junctions - up to DMURS standards should be prioritised and a report on all how all projects meet the DMURS standards should accompany proposals
- Increase walkability, cyclability and permeability for the city - not just in the gross numbers walking and cycling but among key demographics e.g. women, children and older people
- Investment in high-quality connected cycling infrastructure - with an emphasis on a network of safe routes around and through the city
- Each area office should produce a walkability and cyclability audit of the area
- Set a minimum standard for bike lanes in the city – minimum width, maximum possible segregation and best practice surfacing. In parallel, set maximum width for vehicular traffic and reallocate the rest - this will support slower speeds.
- Improvement of any carriageway needs to be accompanied by improvement to walkability

#### Reduce private vehicles and internal combustion engine traffic

- Accelerate plan to remove petrol and diesel public service vehicles from the roads

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- The plan should set targets for reducing the number of private cars in the city centre, aiming for essential private cars only by the conclusion of the plan.
  - Consider a low-emissions zone between the canals, and a ban on vehicles unsuited to “people-friendly” streets in the inner city, such as SUVs.
  - Establish an automatic number plate registration based cordon to enforce the HGV permit system, and apply charges for trucks and large vans also.
  - Ambition should be for one lane maximum of private traffic per direction in the city centre i.e. moving away from the city centre highways of Pearse Street, Gardiner Street etc. Road space should be reallocated to walking, cycling, seating and greening.
  - Convert car parks into intensive bike parking and convert parking spaces into pocket parks or rain gardens to support biodiversity corridors.
  - While electric vehicles are not the total solution they will play a part in emissions reduction. EV charging options needed for residents with on street parking permits e.g. plugs installed in lampposts
  - Integrate electric buses into community microgeneration / smart electricity usage projects.
  - Prioritise projects to increase walkability and cyclability in residential that are currently the least connected and places that have particular car dependency.
  - Set a target for a number of car parking spaces to be removed and replaced with greening, seating or bike parking every year - and accompany this with a budget plan for reducing the city’s financial dependence on parking fees.
  - Expand Dublin Bikes to everywhere inside the canals including a stand in Stoneybatter. Introduce a cargo bike and mobility-aid bike/trike share scheme ideally as part of Dublin Bikes.

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### Other suggestions

- The transport unit should produce a quarterly report on mobility in the city to show success stories, provide data on the worst neighbourhood rat-runs etc. to help advocates and enthusiasts build support for change in their communities. Partner with a third party provider for the mobility data.
- Promote and improve usage of the laneways of residential areas with a “Love Your Laneway” campaign and support permeability
- All new bus shelters to have solar powered LED lighting systems
- College Green plaza to be fully implemented. The city should be aiming to pedestrianise (exceptions for buses, cycle lanes, etc.) everything between Parnell Square and St. Stephen's Green, and between Capel Street and Marlborough Street/Merrion Square.

## 6. The City, Urban Villages and Retail

Helping retail in our city and neighbourhoods such as Phibsborough and Rathmines.

- Our libraries are a central resource for resilient and equitable communities. They also offer a lot of potential to support remote working and study spaces on a more equitable basis than what could be provided by the public sector. They should be invested in and developed accordingly.
- Planning needs to ensure there is a diversity of retail in urban villages and retailers need to be supported in ensuring their supply chain and business practices are sustainable and support local suppliers, contracts and service providers.
- Faith Institutions and other major landowners in the city should be engaged with to support the ambitions of the plan, particularly with regard to use of the lands they own.
- Emphasis on supporting retailers to maintain original architecture of their shop front.
- Encourage cafes and restaurants to provide safe and appropriate outdoor spaces (e.g. roof terraces, rear yards, front seating)

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- Over the shop living should be encouraged, or other ways to maximise public benefit from above ground floor retail spaces

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

Developing more outdoor spaces for sports and play opportunities, while protecting our rivers and canals and parks.

SDG Target 11.7: By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities

### Illegal dumping

Much positive work has been done by the staff of DCC, community groups, and business groups to make Dublin a cleaner city. Nonetheless we have a long road to travel particularly in certain city centre litter black spots. The development Plan needs to increase resources for tackling illegal dumping and discourage illegal dumping with greening.

### Equality and access for all

There are a number of steps the plan should take to ensure Dublin is a city that is accessible to all and treats all equally:

- Gender and equality audit public space
- Play inequality should be addressed and a target minimum amount of play space to be made available per child in every locality and strategies identified for “play poor” parts of the city
- All ages recreation spaces with activities such as table tennis and bowls facilitated in parks. Public and private developers should also be encouraged to provide facilities in lands that the public has access to.
- Sports fields should include greenery to support biodiversity and drainage at their peripheries or surrounds
- 24/7 accessible public toilets are needed in the vicinity of parks and throughout the city.



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- More public seating is needed - particularly near urban villages and in the North city centre
  - Parks need to support permeability and passive surveillance by supporting people to walk and cycle through them.
  - Better lighting or illumination measures are needed for parks during the winter months with the ambition of recreation space being safely accessible until late evening year round (taking care that any such lighting is done in a manner that introduces the minimum of light pollution or disruption to biodiversity).
  - Increase the provision of high quality, secure WiFi / cellular networks in public spaces

### Biodiversity

- The Development plan should be coherent with and support the All-Ireland Pollinator Plan and all development must demonstrate how they will support and enhance pollinators and biodiversity
- Where possible native trees and plants should be used to support drainage, and as part of biodiversity and wildlife corridors across the city. The plan should favour trees in the ground over trees in planters.
- The plan should aim not just to prevent negative impacts on the city's biodiversity but rather to encourage improvements to the city's biodiversity though for example native planting, swift boxes, bee friendly areas, and green walls and roofs in developments
- We would also recommend an investigation of the effect of loose pets on biodiversity in the city.

### Other suggestions

- A plan should be implemented to maintain and develop Mountjoy Square as a vital amenity for surrounding residents
- Develop a car-free plan with public transport and active travel alternatives for Bull Island.
- Public sports fields and pitches should be within walking distance for all residents in the city

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- Develop sports fields with 4G surfaces and lighting to facilitate more access.
  - Water refill stations and bike maintenance stations should be in every park and pocket park.
  - The plan should encourage and support more allotments and community gardens
  - Natural drainage must be prioritised with rain yards and SUDS

## 8. Built Heritage and Archaeology

Protecting important historical and archaeological sites.

SDG Target 11.4: Strengthen efforts to protect and safeguard the world's cultural and natural heritage

- An inventory of unused buildings in the city should be conducted - both privately and publicly owned - and carrot and stick incentives developed to bring back into use.
- The development of the Sean McDermott Street laundry as an appropriate site of commemoration is central to the city's cultural development.
- Moore Street historical sites and architecture must be elevated and supported in line with the needs of the street traders.
- O'Connell Street is the central boulevard of the city and an overall plan for the development of this which supports markets, businesses and community life should be considered
- Local businesses in historic buildings should be encouraged to promote the heritage and history of their building e.g. as Lidl on Aungier Street has done<sup>6</sup>.

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<https://www.rte.ie/news/2020/1013/1171342-new-lidl-store-gives-shoppers-glimpse-of-dubli-ns-past/>

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## 9. Culture

Maintaining and developing our arts and cultural heritage

- Support venue spaces in the city that can host a wide variety of arts and cultural events.
- Culture is not just about spaces but about events. We need to ensure our outdoor and indoor public spaces can support arts events, including pop-up events, considering issues of licences, access and safe ways to congregate.
- We should explore ways to increase use of public buildings for cultural projects during times of underuse (e.g. offices at weekends, schools during summer).
- Artists, particularly from minority backgrounds, should be supported with commissioned murals, lanesways etc that all support the wider climate and integration aspirations of the Council.
- Attach local 'Artists in Residence' to public construction projects, to promote and generate cultural records for the lifecycle of the project - from design stage, during construction and final occupation (e.g. photographers, poets, graphic artists).

## 10. Sustainable Environmental Infrastructure and Flood Risk

Including flood risk protection, water supply and good digital connections.

SDG Target 11.5: By 2030, significantly reduce the number of deaths and the number of people affected and substantially decrease the direct economic losses relative to global gross domestic product caused by disasters, including water-related disasters, with a focus on protecting the poor and people in vulnerable situations

- The Liffey is one of the greatest assets of the city and the city should meaningfully progress a Liffey animation strategy in line with flood prevention and community development ambitions.

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- Continually improve the water quality in the rivers and seas around Dublin City - ensure high quality of cleanliness for swimmers at all times of year.
  - Incorporate life-cycle environmental assessment when evaluating buildings and developments - so that it is not just the cost of materials involved in construction but also the cost of knocking down previous buildings and over the course of a developments lifetime that are considered
  - Environmental Impact Assessments need to more clearly demonstrate and measure embodied energy associated with developments - i.e. it is not good enough to have developments which will cause significant emissions by demolishing old buildings and will take a long time to make up for those emissions through increases in efficiencies in running costs
  - Investigate green bus-stops with green roofs or solar panels on the roof.
  - Encourage projects that reduce water usage, encourage rainwater harvesting and continue to repair leaks in the distribution network.