



Heritage Council

Submission on the emerging Dublin City Development Plan 2022-2028¹

'Putting City and Town Centres First!'

Key Priorities for the plan in order to support the delivery of UN SDGs, the NPF and RSES:

1. Ensure the UN Sustainable Development Goals are at the heart of the new city development plan in order to acknowledge and appropriately respond to Dáil Éireann's declared National Emergency on Climate Change & Biodiversity Loss² in May 2019 and the *Climate Action and Low Carbon Development (Amendment) Bill 2020*;
2. In accordance with the UNECE Aarhus Convention, the EC's Urban Agenda and the European Landscape Convention (ELC), formulate and deliver a policy in accordance with the PFG's *Town Centre First Policy* for the designated key urban villages within the city's administrative area, e.g. formulate a robust policy for the necklace of urban villages around Dublin Bay;
3. Embrace the key tenets of the Programme for Government (#PFG), which was published in June 2020, including the need for a national policy focusing on Town Centres First, the enhancement of the built heritage in urban villages, and the reuse and repurposing of vacant buildings in historic town and city centres;
4. Ensure that the Dublin City Heritage & Biodiversity Action Plan is updated to support the city's development plan's heritage objectives and to achieve stated government policy as set out in the National Heritage Plan 2002 and a key action under *Heritage Ireland 2030* – the Heritage Council notes and supports the recent progress on DCC's Biodiversity Action Plan, which we hope to participate in, both in content and actions;
5. Ensure all aspects of the management of Dublin Bay Biosphere Reserve are implemented in line with the LIMA Action Plan – the Heritage Council would be happy to support the Council in this regard.
6. Assess the impact of Climate Change on current heritage and future development in the city – potential development land within the city centre boundary may have to be reassessed to facilitate expected sea level rise and inform proposed flood relief schemes – this would not preclude uses such as greenways or similar – any assessment should include opportunities for green-ecosystem services;
7. Establish sustainable key indicators and monitoring processes through Strategic Environmental Assessment (SEA) to ensure that a city-wide Town Centre First Policy is working
8. It is recommended that the local authority and its partners could involve international peer reviewers on city centre matters and network within the CTCHC Programme to ensure that this recommended monitoring takes place;

¹ Please note that this submission is in final draft format (on the public file) until it has been presented to the Heritage Council Board.

²

https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_climate_action/reports/2019/2019-03-28_report-climate-change-a-cross-party-consensus-for-action_en.pdf

Focus on City Centre and Buildings Renewal:

9. Planning policy needs to reflect the embodied carbon in existing building structures and fittings, and establish a 'Carbon Accountancy' for development proposals to ensure that existing buildings are not needlessly demolished to be replaced by new buildings of equivalent spatial characteristics. This includes recognising the contribution that buildings, which are not now perceived to be part of the architectural heritage and have a contribution to make to public goods;
10. Planning policy needs to move away from a two-dimensional zoning approach to the three dimensions of city streets, and multi-use occupancy, which makes a city liveable, intense and varied. In particular, housing policy needs to promote mixed housing forms, and move away from large-scale developments for highly-defined market segments. For example, it is problematic that permissions continue to be granted for student housing, while the Covid-19 pandemic response is radically changing student's accommodation needs, probably permanently. Similarly the urgent need for new housing is not a good enough reason to make radical and disruptive shifts in the scale and grain of the city
11. Dublin City Council's Heritage Office has, through a sequence of research projects and publications ('More than Concrete Blocks'), highlighted the positive contribution that many twentieth century buildings have made to the city. The protection of exemplary and pivotal modern buildings as part of the architectural heritage should be actively considered in the review of the Record of Protected Structures for this Development Plan;
12. Urgent consideration should be given to the recommendation of the *South Georgian Dublin Townhouse re-Use Guidance* of 2019 that a One-Stop Shop service be provided to the owners of buildings to harmonise the Local Authority's diverse functions as Building Control, Planning, Fire and Architectural Conservation. Such provision would facilitate the adaptive re-use of existing buildings, offset construction industry carbon emissions and make for a more liveable city;
13. Include specific policy to support *Collaborative Town Centre Health Checks* for the city centre following the Heritage Council and Partners' award-winning programme methodology i.e. the 15-Step CTCHC process. Please see Tralee and Letterkenny CTCHCs - both towns are recipients of the Bank of Ireland's National Most Enterprising Town in Ireland Award in 2017 and 2018;
14. Undertake *Collaborative Town Centre Health Checks (CTCHC)* for the core city centre area and key urban villages in Dublin City every two years and throughout the plan period – create a bi-annual monitoring system in partnership with local chambers, civic groups/leaders, etc;
15. 'Pilot' a *Conservation Area Regeneration Scheme (CARS)* in Dublin City Centre in partnership with the Heritage Council and Dublin Civic Trust - see Scotland's CARSs and City Heritage Trusts;
16. 'Pilot' a Heritage Action Zone (HAZ) in the city centre in partnership with the Department of Housing, Heritage Council and other stakeholders;
17. Support Dublin Town (BID), which has been significantly impacted upon by ongoing Covid-19 restrictions – explore the potential to establish other BIDs in the city's administrative area;
18. Formulate and deliver a *Dublin City Centre and Buildings Renewal Plan* as soon as possible, working in partnership with the Department of Housing, Local Government and the Heritage Council. This plan should also promote the historic city centre as a Strategic Energy Zone (SEZ);

19. The city development plan should support an audit of embedded carbon in existing buildings in historic town and village centres within the plan area – this audit could link to the ongoing work of the CTCHC Programme and the proposed City and Buildings Renewal Plan³;

Strategic Housing Developments (SHDs) and Investment in Building Stock:

20. Ensure that all Strategic Housing Development (SHD) proposals are within or adjacent to the city centre or close to public transport hubs. Undertake full review of existing opportunity sites in the city centre as part of a much-needed switch to a City/Town Centre First policy in line with government policy;
21. Widen and deepen the *Investment One-Stop Shop* for Dublin City Centre in partnership with relevant private and civic partners and other international and national partners;
22. In line with EC policy, formulate a *Dublin City Centre Living Strategy* as soon as possible in partnership with the EIB and other private investment and social enterprise partners;
23. Prepare a sustainable regeneration plan for publicly-owned land banks - focus on city centre sites, in line with recommended Town Centre First Policy (see above) – liaise with the Land Development Agency (LDA) in this regard;
24. Develop robust *Enabling Policy* and *Streetscape Design Guidelines* to support infill development in the city centre and urban villages;
25. Formulate and deliver a *Strategic Development Plan* to set up *Business Improvement Districts (BIDs) in the wider city area* i.e. see DublinTown – highlight the need for National and Regional Strategies for the development of BID Companies in Ireland e.g. Scotland has 40 no. BID companies and Ireland currently has four town centre BIDs, including the recently established Drogheda BID;
26. Undertake *Riverscape and Canalscape Studies* in partnership with the NPWS and the Heritage Council and strengthen existing greenways and blueways, etc;
27. Undertake Noise and Air Quality/Pollution Mapping for the city in order to inform strategies for enhancing and encouraging city centre living;
28. Establish a priority Greenway linking the city centre to the main railway and bus stations and establish a Heritage Loop walk in the city centre environs;
29. Work with all the Dublin Universities to identify and develop a vibrant Student Quarter within the city centre;
30. Dublin City Council should audit their land banks, giving particular consideration to opportunities for all ecosystem service provision, this can be as basic as applying less chemical herbicides to roadway management and / or facilitating more natural vegetation to establish for pollinators;
31. The larger urban villages in the city should be enhanced by a range of biodiversity key species, which can play a significant role in enriching the users/consumers' experience – a softening of a rich built environment by means of pocket parks, orchards, pollinators, and swift box enhancement etc can all go a long way to enhance the urban fabric as well as functioning as an ecosystem service;
32. That Dublin City Council adopt the All Ireland Pollinator Plan, the National Biodiversity Action Plan and support future iterations of same.

³ https://www.buildup.eu/sites/default/files/content/worldgbc_bringing_embodied_carbon_upfront.pdf

33. We recommend that DCC prepare for full implementation of Marine Protected Areas, both within the current list of designated Natura 2000 sites, proposed Natural Heritage Areas and Refuges for Fauna, but also seek to protect other significant biologically diverse areas such as deep water reefs and ship-wrecks that act as fish nurseries.

Geo-spatial Data Gathering/Mapping, Communications and Public Engagement:

34. Dublin City Council should seek to ensure that all data, which is geospatial in nature is processed, so as to maintain and preserve its original meta data i.e. therefore it may be queried and sorted accordingly;
35. Progress a single source of geospatial truth for the whole of the city. All public authority information needs to be further supplemented and enhanced to provide the appropriate level of detail. The *Planning and Development Regulations, 2001*, clearly specify:
 - Site or layout plans shall be drawn to a scale of not less than 1:500 (which shall be indicated thereon), the site boundary shall be clearly delineated in red, and buildings, roads, boundaries, septic tanks and percolation areas, bored wells, significant tree stands and other features on, adjoining or in the vicinity of the land or structure to which the application relates shall be shown, land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application shall be outlined in blue and wayleaves shall be shown in yellow; and
 - Other plans, elevations and sections shall be drawn to a scale of not less than 1:200 (which shall be indicated thereon), or such other scale as may be agreed with the planning authority prior to the submission of the application in any particular case;It is important that our public planning system is advanced to incorporate this detail and make full use of it.
36. Dublin is internationally known for the quality of its water-logged archaeological deposits which retain important evidence for the origins and development of the city. There is a growing need to record and map the survival of water-logged Viking Age and medieval archaeological stratigraphy so as to use this information to ensure that planning and development policy (e.g. no basements, re-use of existing piles/foundations, minimal piling, green spaces etc) is devised to ensure that this resource is passed on sustainably to future generations.
37. Establish an open data source project similar to *Colouring London*⁴ to engage the public and the Irish Diaspora in the management of traditional buildings in the historic core of Dublin City Centre;
38. Finally, it is recommended that a detailed *Public Communications Strategy* is formulated to ensure that the city development plan is successfully monitored and delivered.

Submitted on behalf of the Heritage Council

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Contact Ali Harvey aharvey@heritagecouncil.ie | M. 087 419 3458 and/or Lorcan Scott on lscott@heritagecouncil.ie

⁴ <https://colouringlondon.org/>