



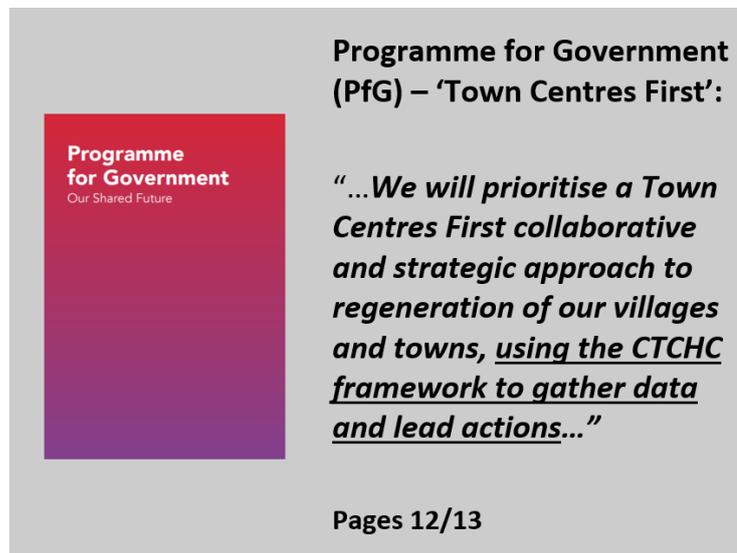
Heritage Council

Submission on the emerging Dun Laoghaire Rathdown County Development Plan 2022-2028¹

'Putting Town Centres First!'

Key Priorities for the plan in order to support the delivery of UN SDGs, the National Planning Framework (NPF) and Regional Spatial and Economic Strategies (RSES):

1. Ensure the UN Sustainable Development Goals (SDGs) are at the heart of the new county 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 Programme for Government's *Town Centre First Policy* for the designated key towns and villages within the council's administrative area, e.g. formulate a robust policy for the necklace of urban villages around Dublin Bay in partnership with Dublin City Council and others;
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 centres. The Programme for Government states the following:



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

4. Ensure that the Dun Laoghaire Heritage Plan is updated to support the county 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 county – potential development land within the administrative area 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, e.g. vacancy levels, and monitoring processes through Strategic Environmental Assessment (SEA) to ensure that a county-wide Town Centre First Policy is working;
8. It is recommended that the local authority and its partners could involve international peer reviewers on town centre matters and network within the CTCHC Programme to ensure that this recommended monitoring takes place;

Focus on Town 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 basic, one-dimensional zoning approach to the three dimensions of townscapes, streets, buildings and multi-use occupancy, which makes a town 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 need for new housing is not a good enough reason to make radical and disruptive shifts in the historic scale and grain of the county towns;
11. Dun Laoghaire Rathdown's Heritage Office has highlighted the positive contribution that many twentieth century buildings have made to the county at large. 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 provision of a One-Stop Shop service for 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 more liveable towns and villages within the county at large;

13. Include specific policy to support the *Collaborative Town Centre Health Check Programme* for Dun Laoghaire and other key settlements 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 key towns in the county 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 partnership with the Heritage Council - see Scotland's CARSs and City Heritage Trusts;
16. 'Pilot' a Heritage Action Zone (HAZ) in Dun Laoghaire town centre in partnership with the Department of Housing, Heritage Council and other stakeholders;
17. Formulate and deliver a *Dun Laoghaire Town Centre and Buildings Renewal Plan*, as part of the CTCHC Programme soon as possible, working in partnership with the Heritage Council and Partners, EMRA and the Department of Housing, Local Government. This plan should also promote historic towns centres as Strategic Energy Zones (SEZs);
18. The county development plan should promote the reuse of traditional and landmark buildings in historic town centres as digital hubs, in line with government policy – see Digital HQ in Dun Laoghaire;
19. The emerging county 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 Town 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 town centres are close to public transport hubs. Undertake full review of existing opportunity sites in town centres, as part of a much-needed switch to a Town Centre First policy in line with government policy as set out in the Programme for Government (2020);
21. Establish an *Investment One-Stop Shop* for Dun Laoghaire Town Centre in partnership with relevant private and civic partners and other international and national partners;
22. In line with EC policy, formulate a *Town 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 town 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 town centres and urban villages;
25. Formulate and deliver a *Strategic Development Plan* to set up *Business Improvement Districts (BIDs) in the county 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;

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

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 key towns in order to inform strategies for enhancing and encouraging town centre living;
28. Establish a priority Greenway linking Dun Laoghaire town centre and other town centres to the main railway and bus stations and establish a Heritage Loop walk in town centre environs;
29. Work with all third level institutes located within or adjacent to the county at large to identify and develop a vibrant Student Quarter within existing town centres;
30. Dun Laoghaire Rathdown County 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 county-at-large 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 Dun Laoghaire Rathdown County Council adopt the All-Ireland Pollinator Plan, the National Biodiversity Action Plan and support future iterations of same.
33. We recommend that DLRCC 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 shipwrecks that act as fish nurseries.

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

34. Dun Laoghaire Rathdown County 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 county including its settlements. 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. 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 Dun Laoghaire Town Centre and other historic settlements within the county at large;
37. Finally, it is recommended that a detailed *Public Communications Strategy* is formulated to ensure that the county development plan is successfully monitored and delivered.

Submitted on behalf of the Heritage Council

16th April 2021

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⁴ <https://colouringlondon.org/>