



**Submission Dublin City Development Plan 2022-2028
February 14th, 2022**

The South West Inner City has seen significant, but starkly uneven, development over recent years. A Docklands-style approach to development appears to be currently underway- the Docklands development did little to benefit local communities in East Wall, Ringsend and Sheriff Street and, to date, development in the SWIC has had the effect of camouflaging the growing disparity among parts of SWIC and the lived reality of large parts of the SWIC community. Overall investment is of little importance when large parts of the population live in fear due to drug related violence caused by high unemployment figures and lack of accessible economic opportunities. Similarly state of the art arts and technology campuses designed to attract new skilled populations pale in significance to the lack of green spaces and recreation areas to serve the very basic needs of the local populations- the area has the lowest proportion of green space per person (some 0.7m per person) in Dublin.

Development in the SWIC has been very uneven to date with a significant focus on attracting new professional classes- this generally has the effect of displacing traditional communities- or transitory vulnerable populations- Dublin 8 has the highest density of homeless hostels in the city- which has the effect of further compounding issues and marginalizing traditional SWIC communities.

This submission is made by Robert Emmet CDP. The purpose of the submission is to provide a representative community centred proposal for an area which has been underrepresented and underserved for years. A secondary purpose is to display the willingness and capacity of the community sector to participate and engage in a more consultative and equitable development of the SWIC area.

Due to the overall scope of the development plan and significant level of time and expertise required to provide a comprehensive response to the policies and objectives this submission focuses on the shape and structure of the city, quality housing and sustainable neighborhoods, the city economy and enterprise, green infrastructure and reception, and the Strategic Development Regeneration Area of the Liberties.

Chapter 1: Strategic Context and Vision

Constructive Collaborative Co-Creative - What Consultation Could Look Like

The citizens of Dublin have in recent times become increasingly aware and motivated by their experience of living in community / distinct neighbourhoods and of the contemporary issues facing them, around progressing standards of planning and issues of equity and respect in the design and creation of sustainable communities.

It has become very apparent that people's 'sense of place' and of the collective responsibility felt to both input to and help shape the ecology of the community is now at an all-time high. There are new signs of a developing consciousness and a revived sense of community duty to make neighbourhoods – both existing and planned– places where homes of quality and a safe, welcoming and environmentally progressive spirit, is matched by appropriate access to social, cultural, recreational infrastructure and efficient transport options.

However, there is also a regrettable, growing sense of disenchantment evident within the broad community sector in Dublin (incorporating residents' associations, development agencies, local environmental, heritage and cultural, arts and sporting organisations) and a palpable frustration at the limited, inconsistent nature of the existing planning and consultative practices operating throughout the city.

This sense of disaffection is felt especially acutely by residents within the South-Central Area of Dublin 8, where changing iterations of regeneration plans, new local strategic and development plans, unprecedented large scale housing initiatives and other ambitious linked transport, tourism and local amenity developments were shaped – in the lead up to and throughout the period of the Pandemic – with scant regard for the sensibilities and circumstances of identified / designated communities.

Paradoxically - there is also a notable appetite within the community to move away from the long practiced, repetitive, and oftentimes adversarial forms of public complaint, lobbying and protest culture. It is nowadays apparent that in their cumulative sense of learning, leadership development and emerging forms of dialogical practices – that particular communities – are surpassing the history of negative attrition attached to such practices, and particularly so in Dublin 8.

The critical and popular requirement now is for the evolution of positive forms of co-design and collaboration – whether between City Council and Communities, or the proposers of major development and communities - which should rest upon the experience of existing 'good practice models' and ongoing, in-depth social research that has long since provided a compelling case for a new transformative approach. Less conflict, confrontation and box ticking - more co-creation, collaboration and listening.

In recent times however the City Council Executive has persisted with a clearly flawed, arm's length, overtly technical and poorly communicated / mediated relationship to concerned communities and citizen organisations.

The pressing issue now – for all our sakes – must surely be to reform and make 'fit for purpose' a new standard of consultative practices. To set out to incrementally reform the prevailing, outmoded City Council practices which are commonly referred to as: "defensive, expensive, illogical, predestined, distant, lip service, tokenistic, secretive, and often with a fixed agenda."

The imperative therefore is to transcend this cultural cul de sac and set a standard which must then pervade all consultation within the planning framework.

To impress upon the City Council the importance of prioritising consultative and co-design measures, underpinned by a clear policy commitment and as well as required resource allocations to help catalyse new thinking, collegiality, and common endeavour - through applied research, exacting standards of training and intentional capacity building measures.

In this manner the values, principles, key features, actioning, monitoring and review of

new, innovative forms of consultation, co-design, and collaboration with the community sector, would constitute a shared, disciplined and enforcing process, that all could be proud of.

Dublin both deserves and should thrive through participating in this long overdue form of innovative practice. Just as in our gradual emergence from the Covid pandemic - there are fresh, evidential shifts in critical thinking related to a range of individual, community, and societal matters. We are already in the midst of profound change and necessary adaptation – so how quickly might we summon the necessary courage and fluency to commence our collective journey?

For we are now unquestionably in a world made smaller, where issues of interconnectedness, interdependence, the responses to the fragility of our environment - and the necessity to act in increasingly more honest, directly informed, and cooperative ways - is the new reality?

Surely these signs of gradual awakening within society and emerging instincts towards forging mutually cooperative actions for the common good – makes it imperative that future shared visioning, be countenanced and engaged with by new progressive forms of leadership and governance?

In these times is it not also crucial to bring strong emphasis to the importance of both the Public Sector Duty and other Human Rights and Equality measures, with related legislation and statutory obligations, already adopted by Dublin City and incorporated within its Corporate Strategic Plan. These measures make explicit the purpose, qualities and benefits attaching to methodically designed and enabling measures for citizens and communities - to engage centrally within urban planning and the breadth of cultural, socio-economic determinations related to the creation of sustainable communities. There is therefore a compelling set of legal, ethical, and practical operational realities incumbent upon the City – in its current drafting of the impending Dublin City Development Plan 2022-2028 – to consider making this particular outline proposal a core element of the main thrust and ambition of the Plan.

Our proposal to the Council is to lead out on the development of a best practice model of meaningful model of collaborative, co-creative consultation.

It is recognised from the outset that a fundamental shift in attitude and cooperative practices, will take a considerable time investment, fit for purpose structures and adept guidance. It follows that this outline proposal to the City Council has a set of seven incremental features:

1. To establish a Pilot Project in Dublin 8 – taking full countenance of the specific planning processes underway in the constituent communities and adjoining areas that impact on same
2. That an appropriate convening body or consortium be charged to operate within the Community Sector (including residents associations) and interface with City Council (e.g.: the Dublin South City Partnership, KIN – the Kilmainham Inchicore Network, Dublin South City Coop, or equivalents) and that the unique professional expertise of CAN – Community Action Network – and their long-established practices in Dublin 8 related to progressive consultative processes and the development of sustainable communities be engaged with from the outset.
3. That relevant section(s) within Dublin City Council (including planning, architecture housing, environment, culture – arts, community – recreation, tourism – heritage, local economic development, equality, and social inclusion) be configured into suitably constituted research and development entity, in which to consider the rationale, primary features and characteristics of this proposal.
4. To be followed by establishing a clear working protocol and shared terms of reference with whatever convening body is determined to be the optimum within the community sector to initiate and coordinate a local Dublin 8 engagement with City Council.
5. Establishing a clearly defined partnership approach to -timeframe; independent and linked

interdisciplinary roles; appropriate resource levels; co-designed research and learning initiatives; a commitment to crafting an initial model of City / Community consultation and co-design; to implement same; establish an independent review and evaluative process; and record, publish and disseminate the findings of the pilot project.

6. The design and operation of a sequence of both Civic Offices and community-based workshops – within a broader set of designated areas in Dublin – in which to introduce and illustrate the nature of the evolving model. This step would ideally link to related education and training experiences for City Council councillors, staff, and community sector representatives – on a consistent ongoing basis.

7. Thereafter the replication and testing of key learnings and resulting organisational frameworks, within which to deepen and consolidate the emerging, contemporary consultative and co-design practices.

In conclusion, the zeitgeist and mood within the city is unquestionably disturbed. People are experiencing this as an aberrant and depressing flux – yet it is also beginning to drive a compelling momentum towards re-examining the recognisable democratic deficits within our urban lives and to actively seek practical and effective redress.

For the majority of Dubliners this communal disenchantment is most clearly reflected in the harshness of the housing crisis, with its ever-increasing dimensions of needs and apparent poor handling by the relevant government departments, related statutory bodies and local authorities. This is felt most acutely in those communities officially designated as disadvantaged and awaiting properly realised regeneration plans; to rent strapped students; young workers who continue to live with their family of origin; couples with children who cannot afford the inflated market rates to secure a home, and in particular, the acutely vulnerable and homeless people of our city – when examined holistically is an alarming vista, within which people are often left questioning - who in fact the city is for.

Latterly, the spectre and suspicion of what presents as developer led planning, speculative international investment fund practices and recent Central Government expediency in establishing the LDA – Land Development Agency, with unprecedented powers of coercing land / housing dynamics, has caused a further level of anxiety and stress within ordinary families, young people, and particularly less affluent communities.

So, notwithstanding extant consultations - at various levels within the Council - there is a view that the system is excessively complex and impenetrable to the ordinary citizen.

There is an ever widening disconnect, compounded by the sense that commercial interests or third parties are being prioritised ahead of local community concerns- and whereas engaged with in a perfunctory manner - more often citizens now sense that the major planning and development decisions have invariably been pre-determined. Whether true or not, the perception is real and widespread.

In contrast, consider how vitalising and uplifting for all stakeholders if - within the City Development Plan 2022-2028 - there was an unequivocal guarantee to actively redress the currently unbalanced, inefficient and effectively redundant mode of consultation.

For is it not incumbent on Dublin City Council -in view of these self-evident circumstances - to lead out and demonstrate a renewed regard for its own citizens. To acknowledge communities' innate intelligence and the potential for collegiality and creative possibilities that arise when people are engaged with on an explicit basis of trust and common purpose.

And doubly so at a time when the adversity everyone is facing in a turbulent world order, with climate imperatives, deepening inequality, systemic rigidities and the regular inefficiency and waste of public resources often visible within our State and Civic armature.

Chapter 4: Shape and Structure of the City

Dublin 8 is a mixed diverse historic area with the highest density of population in Ireland. It traditionally was a mixed manufacturing area famous for its brewing and textile making. It is home to national infrastructure and historic buildings including the Coombe Hospital, St James Hospital, St Patrick's Cathedral, Christ Church Cathedral and Guinness.

It is an area that has undergone changes in the past 20 years and requires careful development management policy and practices to protect and improve the area for all who live and work here. The idea of the 15 minute city, compact in nature while admirable, poses problems for this part of the city. It is already compact –it needs green infrastructure rather than more compact development. There are a range of vernacular housing types present in the area e.g., the Tenters for example where higher densities against historic residential types of dwelling will damage the existing milieu and residential amenity without careful control measures .In the rush for the compact city what are we wiping out and why? This part of the city is already more dense than Copenhagen, a city that is held as an example of compact growth.

It is our belief that the area suffers from an oversupply and development preferences for particular development types - namely student accommodation, co-living, hotels, drugs and homeless services. The area has seen a "hollowing out" of a number of community services including a library, post office, swimming pool and theatre. Among the losses from the "hollowing out," include the loss of the wellness and community amenities that were once available on the TUD campus on Kevin Street. With the dense redevelopment of that area, the community lost access to a gym, a swimming pool, subsidized exercise classes, a concert hall, and are instead met with a massive redevelopment with 400 units per hectares and no true community benefit for the area.

When we envision the function of the 15 minute city, what does this truly look like for community members in the SWIC that lack access to community resources and space? Older People can gain immense benefits from activities such as aqua aerobics but cannot access a public swimming pool in their community and must travel well beyond 15 minutes to Rathmines due to there only being one public swimming pool shared between Dublin 1, 2, 4, and 8?

The reality of the SWIC is that community members have long been dependent on, and benefited from, the infrastructure that was put in place in the late 19th, early 20th, century by Lord Iveagh. However, recent decisions and developments have resulted in many amenities that were once public spaces, such as the Iveagh Market and the Iveagh Baths passing into private ownership and reducing community access to appropriate shared space. These once thriving community resources are now heritage sites and the reserve of the excellent Liberties Cultural Association rather than being active community spaces.

No coherent plan to develop appropriate social and community infrastructure has been put in place by DCC to make up for the loss of these important community resources and individual community organizations have been left to fill the void. Any attempts to understand the level of local need vis-a-vis the level of available resources and facilities required to develop a strategic approach to resourcing the community has been left to individual organisations- SICCCA Community Needs Analysis- and umbrella organisations such as CORN. A recent CORN survey on available community buildings completed by 21 local organisations found that:

20 organisations do not own the space they operate out of (with 17 of 21 paying rent)

15 organisations use space that is not appropriate for the service being delivered

19 organisations require additional space to deliver services.

All of the organisations surveyed provide important services to the local community but are threatened by the lack of appropriate facilitation from DCC and the closure of any service- a very real

spectre when approx 80% of services are renting space from private owners- would result in further losses to the local community and lay bare any claim to a 15 minute city.

There is also a justice element to provision of services in the SWIC stemming from the point that services here are for the most part designed to benefit transitory populations rather than the existing community. Local road infrastructure and very high levels of traffic serve other community members who use the SWIC as a thoroughfare resulting in poor air quality in SWIC having very low levels of car ownership. Similarly, the response to the issue of an oversupply of infrastructure for motorists is targeted towards transitory populations from a particular social demographic that are only interested in accessing the inner city for their interests in particular leisure, without recognising the needs of inner-city residents. This is also echoed in a number of developments being considered such as Liberties Creative Campus- outcome from a recent consultation delivered by Turley would indicate that such a development would serve the needs of transitory populations rather than the existing Liberties community.

Finally, previous developments in the area have left a legacy of distrust regarding the planning process. Conditions set down in planning permissions e.g. Frawleys, for access to green and public spaces have not adhered to conditions with no enforcement taken.

Proposed Policy for Development Plan 2022- 2028

The need for strong enforcement and engagement with the local communities is key. Bad faith planning must end.

A need to provide community space in premises that meets current and emerging needs. We recognise the role that Dublin City Council plays in this regard and wish to see increased support for their role and wish to see an increase in CSR from the private sector. We recognise the history of philanthropic infrastructure in the area from the Iveagh Trust and various church denominations and need to see a renewed commitment to the area from those who benefit from it.

There is a need to have an objective restraining the oversupply of one type of service in the area. The community has always welcomed and provided for those those in need, witness its history from the Huguenots, Quakers, the Mendicity, The Mercy Family Centre, School Street Family Resource Centre, Warrenmount services, Sophia Housing as well as our community based organisations, SICCD, SWICN, Robert Emmet CDP, Penny Dinners, Solas Project and many many more. 80% of all homeless beds are in D1, D7 and 8 in addition to a large number of low threshold drug services. There needs to be balance and services should not be beside schools, after schools, youth services and a cap on provision including intensification of existing services.

This objective should include proportionate ratios for future development of commercial, housing, green etc developments to ensure that the future development of the SWIC is sustainable.

Proposed Objectives for Development Plan 2022 – 2028

- A dedicated enforcement protocol for large scale developments in Dublin 8
- Equality proof the plan including gender and youth proofing.
- Provision of community space through public provision, philanthropic and corporate social responsibility.
- Limit high support services within Dublin 8 and ensure equitable spread throughout the city and region
- Develop a community safety plan - this can look towards and be influenced by the pilot community safety plans currently operating in Dublin 1 and 7. There is a need to support physical interventions in the environment that enhance community safety for vulnerable

groups such as women, LGBTQ people, young people, older people. Examples can include: increased lighting, reduction in derelict sites, clearer signposting, clearer mapping, and campaigns to increase safety in public spaces such as parks (e.g. the inner city running tour).

- Support for community festivals e.g. Liberties festival, Halloween, as well as smaller festivals to encourage integration and community building.
- A healthy communities plan to be developed for the area and limits on fast food outlets particularly beside schools, childcare and youth services. It is important to note that both the North Inner City and Ballyfrimot both have a Healthy Communities programme and plan in place, which is currently lacking in the SWIC. The SWIC can benefit from this and we need similar resources to implement.
- To continue to develop opportunities between third level institutions and the local community including lifelong learning opportunities. We note BIMM's music production course for young people among others as well NCADs use of space for community presentations. As highlighted above, the loss of TUD on Kevin Street has had grave implications for the community.
- To acknowledge the important infrastructure and role of Dublin City council libraries and their staff play in fostering integration and lifelong learning as well as community education providers.
- To ensure wifi availability for all residents. Wifi availability can be poor in some older flat complex's due to the build.
- To develop a Heritage plan for the Liberties and identify opportunities for the local community from it.
- To mark former Cllr John Gallagher within the proposed Heritage plan for his role in Wood Quay protests, the establishment of the Liberties heritage association, his wide ranging community activity and his archive. John Gallagher sadly died in 2020 from Covid

Chapter 5: Quality Housing and Sustainable Neighborhoods

As highlighted above, the South West Inner City has seen significant, yet incredibly uneven, development over recent years. The area currently has a lack of appropriate housing to meet the needs and safety of community members. For example, there are issues such as the quality of housing, lack of community spaces and facilities, and housing access issues for people with disabilities, older people, and families with young children. There are issues of safety for children and young people that result both from lack of green spaces and playgrounds, paired with antisocial behavior that is exacerbated by the lack of community spaces and services.

While there has been much development in the area over the years, there is an over emphasis on developing student housing, co living schemes, and hotels, while the area continues to see a deficit in affordable housing for families and long term residents. As a result, there is an unraveling of the social fabric that has been central to the strong sense of community in the Liberties that has prevailed throughout history.

The current development climate creates an environment of compounding inequality where residents not only don't have access to quality housing but also lack access to quality community amenities such as community centres, recycling facilities, and access to shops that are affordable and relevant to their needs. In order to ensure that development plans create opportunities for a good quality of life and liveable communities, it is imperative that focus is placed on both developing quality affordable housing and the appropriate services and facilities.

The dearth of social and affordable housing for families who wish to remain in the area linked to their social supports and networks is causing a breakdown of community and social structures. As a result, families who would have traditionally have a generational tie to a particular neighborhood

can no longer afford housing to stay in the area, yet cannot access Dublin City Council Housing, and as a result are pushed out of their community, often having to relocate to other counties in Leinster. With this loss of home also comes the breakdown of community: people are no longer able to remain in the community where their social networks are located, and as a result, intergenerational relationships and support structures crumble due to the lack of affording housing supplies in the inner city.

Proposed Policy for Development Plan 2022 – 2028

- Regeneration of estates to have residents at its core.
- Proper sized apartments with balconies, green space, communal and community space to be provided in all new and regeneration sites. Access for people with disabilities and older people to be incorporated.
- Affordable housing needs to be provided and opportunities for additional social housing and supports including special needs and elderly to be identified.
- AirBnB to be properly regulated and prevent long term housing returning to the platform and distorting the housing market.

Proposed Objectives for Development Plan 2022- 2028

- Prioritise zoning for a mixture of housing including both family homes and apartments, with an emphasis on affordable housing.
- Create eco systems within and around housing areas to include things such as playgrounds, green spaces, recycling facilities, community centres, access to shops that are accessible and needed by the local community.
- Recognise and address the needs of residents in the Dublin 8 area who need to be rehoused.
- Shift focus and priority away from transient communities (such as students and AirBnB) and towards long term residents and the diverse community members living in the Liberties.
- Ensuring that there is a political will and action plan to make the Liberties a liveable city and community.
- Fuel poverty is a problem in economic, social and environmental terms. There needs to be a plan of retrofitting of City Council homes as well as support for those living in private dwellings
- To work in collaboration with local community organisations who have recognised the challenges of the lack of community spaces and could be useful in identifying derelict spaces and ways to develop spaces to address community needs.
- As highlighted above, the Liberties is already a compact 15 minute city and due to it's proximity to the city's core, it is being punished with over densification. For example, a recent SHD proposal for Cork Street is in excess of 652 units to the hectare in an area which is already limited in green space and saturated with units which are too small, thus creating a host of issues for the future. The Residents of the Liberties have always lived in a compact city, and there comes a tipping point in which it is too dense and unsustainable, the recent proposals and overdevelopment of the area, with Cork Street as an example, mark the tipping point.
- In addition to more affordable and quality housing, there is a need to invest in support for housing of older people and those who have disabilities. The Liberties is well above the national average for people living with disabilities (12% nationally, 20% in Dublin 8), and there is an opportunity to respond to the unique needs of older people and those with disabilities, and ensure housing is supportive, age friendly, and up to humane living standards. There are a number of housing complexes for older people in the SWIC and there should be a priority in the development plan for investment in the refurbishment and

insulation of these houses to ensure that they are comfortable, safe, and that fuel poverty is reduced, recognising that older people are on a fixed income and this is a common issue. SICODA currently runs regular services for older people in the SWIC, supporting up to 30 older people with weekly wellness groups and have delivered over 1,000 wellness and activity packs, and older people are consistently sharing about fuel poverty, the challenges with accessing resources to ensure their houses are safe and liveable, and accessibility issues as they get older (e.g. living on the third floor of an apartment with no elevator, etc). There are opportunities for the development plan to take real action in ensuring age friendly policies and housing are a priority.

Chapter 5 of the Draft Dublin City Development Plan 2022 - 2028 includes a section on the Youth Friendly City

To promote and support a youth friendly city including the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure. To promote a built environment in the inner city, developing areas and Strategic Development Regeneration Areas which support the physical and emotional well-being of children and young people. To promote policies and objectives that have regard to the Children and Young People's Plans prepared by the Dublin City North and Dublin City South Children and Young People's Services Committees and any future DCC Youth Friendly City Strategy including any future youth homeless strategy.

We strongly welcome the inclusion of the section on a Youth Friendly City in the draft development plan. Young people have long been overlooked in our city and our hope is that this is the beginning of a culture shift that sees young people as central to the positive development of Dublin city. Young people in the South West Inner City face a variety of challenges, such as high levels of economic and social disadvantage, the presence of drugs and criminal activity and the adverse mental health impacts of the issues above, among others. Furthermore, these issues are compounded by the lack of access to youth clubs and services in the Liberties and surrounding areas. There is a real need for investment in sustainable youth services for young people of all ages, including school aged children who rely on afterschool services, and young people who are out of mainstream services such as education, training, or youth clubs.

In Dublin city, particularly the inner city, there is a serious issue regarding the lack of dedicated youth work space where youth projects are unable to operate properly due to a lack of suitable premises. This is an urgent and basic need that needs to be addressed in any development that is happening across the city as well as addressing the issue in the already built environment.

Dedicated youth space and infrastructure where young people are free from intimidation and from where they won't be just moved on sends a message to young people that the city is somewhere they are valued and can find belonging in. However, young people get consulted a lot, promised a lot and could be forgiven for thinking that nothing will come of it.

Other aspects of our city's development, including culture, housing, environment, must also take account of young people. What their needs are, how they engage with our city, how our city engages with them. Young people need to feel real ownership of their immediate area and also of their space in the city, they need to be part of the planning, decision making and delivery process.

As highlighted above, the loss of the developments and community amenities at the TUD campus on Kevin Street represented a real loss for young people. For example, children no longer have a swimming pool to learn how to swim and access to gyms and spaces for recreation.

We strongly welcome the future development of a Youth Friendly City strategy that would consider our young people in the city as a whole. We believe young people are the future of our city and that it is vital to bring them to the centre of the planning of the future development of Dublin. If we want to see the vision of Dublin as “an attractive place to live, work and visit” realised, we need to ensure that it is a place where our young people can flourish.

Dublin City’s development plan should aim to work collaboratively with residents and community organisations and invest in designated community spaces for young people and the resources to support them.

Chapter 6: The City Economy

Current State

The SWIC is relatively deprived compared to other areas of Dublin and recent economic development in the area has been very uneven and mainly targeted at attracting new skilled populations or transitory populations- tourists, students and individuals attending emergency services. While these developments change the overall economic representation of the SWIC, in reality they have the effect of putting the traditional community at a further disadvantage or displacing them entirely.

Traditional communities are often affected by high levels of multi generational unemployment and there is the real issue of more attractive and readily available opportunities on the black market. Adjacent to very specific investment, the drugs industry has been allowed to flourish in the SWIC to a degree that makes it a major economic attraction for many people, which provides a serious competition for legitimate work, enterprise, and education.

In order to ensure that the city economy can benefit all community members, especially those in the SWIC and other deprived areas, it is important that economics are as accessible as possible from the top down. Ideologically driven policy and development which, over many decades, has failed to break the long term cycle of poverty, marginalization, intergenerational disadvantage and exclusion in the SWIC needs to be abandoned.

The future economic development of the city, particularly in the wake of COVID-19, should explore innovative ways to build community resilience. A forthcoming report, to be published by NESCC, titled Economic Resilience in Sustainable Communities Innovative Approaches to Maximising Local Benefits, explores the potential of Community Wealth Building as a model that can distribute development opportunities widely and democratise local economies. This model should be a cornerstone of the recovery from COVID-19 in Dublin

Proposed Policy for Development Plan 2022 - 2028

- Recognise and address the significant issues of disadvantage in the Liberties
- Recognise the great economic and employment potential of the Liberties and take action to realise the potential of this Innovation District
- Work collaboratively with a variety of local stakeholders such as community development projects to ensure that economic opportunities are as realistic and widely accessible as possible.

- Recognise the ability of social enterprise as a means of advancing economic opportunities for the local population. Link with local community development projects etc to ensure this is done comprehensively and targeted appropriately.
- Build for the future. As innovation, knowledge, apprenticeship are more and more required in the city economy, the opportunities to acquire those need to be provided to the local young people.
- Enhance the retail streets of the Liberties as a strong retail offering with a focus on small scale local shops as well as provision for Market trading Iveagh Market to be protected and returned to its original use to be confirmed as a community based market.
- Ensure that new private developments include public benefit clauses. Public benefit clauses should be developed based on a comprehensive needs analysis and conversation with the local community.
- The potential for existing supports / support organisations needs to be maximised and the effectiveness of these supports and schemes kept under constant review.

Proposed Objectives for Development Plan 2022 – 2028

- Work cooperatively with community organisations and youth services to deliver economic benefits and development opportunities
- Advocate for the extension of the Government funded North East Inner City initiative to the SWIC, as set out in the Programme for Government. See www.neic.ie
- Utilise the large number of vacant or derelict sites in the SWIC for appropriate use
- Develop an employers forum in the SWIC. The primary purpose of such a forum would be to ensure that communities in the area benefit directly from employment and training opportunities as well as facilitating ongoing dialogue between employers, communities, schools etc.
- Public Benefit Clause to ensure community benefit from all large scale developments in the area e.g. Guinness site
- Expand and deepen participative budgeting processes in SWIC in order to ensure people are included in decision making in a robust and tangible way. The Development Plan should also commit to implementing the relevant recommendations of the 2019 IPA report on Participatory Budgeting.
- Implement local social enterprise strategy- work with the local community and voluntary sector to support appropriate social enterprises and ensure that there are opportunities for social enterprise to benefit from all significant new developments.
- Design and implement Community Wealth Building approaches in order to give communities a greater stake in the SWIC economy and encourage broad based economic participation and empowerment

Chapter 10: Green Infrastructure, Open Space, Recreation and Natural Heritage

Current State

The SWIC area has a documented severe lack of public open space and sports facilities and Street trees etc (see research by Department of Geography UCD and Liberties Greening Strategy), and have a general poor quality of public domain and addressing these deficits should be a priority for DCC.

Recent research by HSE and EPA www.epa.ie has shown the significant health benefits of green spaces, especially during COVID-19, see statement by Dr. Stephanie O'Keeffe HSE Head of Health and Wellbeing at launch of research.

The Covid-19 pandemic and the disproportionate impact this has had on inner city communities has shown the need for more and better open and green spaces. Many areas of significant disadvantage also have huge open space deficits so it's a major health and social justice matter.

Many areas of Dublin 8 also have obvious resources that are not being optimally utilised such as the canal moving west from the Suir Road / Rialto. Neither is the River Liffey being optimally utilised as a resource. Even small levels of investment can bring blue resources e.g. Kayaking Facility at Custom House Quay. While parks that have been developed since the last plan- Weavers Park and Bridgefoot Street Park- are welcomed more needs to be done.

Proposed Policy for Development Plan 2022 - 2028

- Significantly increase public open space provision and tree planting in the Liberties to address major documented deficits
- Significantly increase use of waterways
- Comply with the public sector duty on human rights and equality see www.ihrec.ie including the UN Convention on the Rights of the Child and Article 31 on the right to play
- Active living opportunities in terms of communal open space to be provided with opportunities for programmed uses e.g., tai chi
- Enhanced greening of the area with the involvement of the local community.

Proposed Objectives for Development Plan 2022 - 2028

- Prepare an Environmental Improvement/ Public Realm Plan to address the significant deficits in quality of place
- Protect green space from rezoning including legal protections
- Prepare an updated Greening Strategy using an iterative process which includes the community's view.
- Create a bee highway- a route filled with green roofs and flowers—that supports bees living in city environments. This approach was successfully pioneered in Oslo in 2015 and allows companies, residents and DCC / statutory bodies to take responsibility for biodiversity together. Robert Emmet CDP operates a socially and environmentally sustainable inner city beekeeping project which could support such an approach.
- Increased provision of community gardens, green walls and roof gardens. SICODA currently runs a community allotment where residents and volunteers oversee growing plans, harvesting, and cooking with locally grown produce, which could input into this approach.
- Review the current road infrastructure and amend the current facilities to accommodate trees and walking/cycling on the side of the roads:
- Cork Street, High Street, Christ Church Place roads to be reimaged to become community friendly with increased green space and reduced pollution.
- Develop an infrastructure of green roofs that are accessible to members of the public
- Incorporate shared energy infrastructure into development / retrofitting of housing such as was done in England by Repower London.
- Develop pilot project for waste disposal

Inclusion of Micro Zonings or Micro Areas:

To prepare a Green Infrastructure Strategy for Dublin City that will include a newly developed set of green micro areas.

The intention with the inclusion of this section was informed by thinking around the creation of a category of Green Zonings together with designated percentage/quantified targets that would facilitate communities to imagine greening in their areas. For example: urban farms, pocket parks, micro parks, green walls, green roofs (anything planned over a certain height has to include green walls and roofs).

Some further ideas that came out of the greening walkabouts we did around the Dublin 8 area and that could form the basis for a list of 'Green Micro Area Zones' include:

- Green Seating - planters with benches on wide footpaths, outside shops
- Replacing a percentage of Car Parking Spaces and replacing with permanent Green Seating/Pocket Parks, not planters
- Green Walls
- Green Corridor - tree planting on major road spines
- Garden Corridors - offer people with small front gardens on main roads trees, support planting and maintenance in early stages
- Green Paths/Parking spaces
- Turning small private/public open spaces into green corners
- Roaming Green Seating - temporary seating/greening installation that is moved between locations example sites waiting to commence construction, unused shop fronts on a temporary basis
- Make Semi Public Gardens Public, e.g. church grounds could be used for park and/or community outdoor event space/place of sanctuary
- Keep Tree bases open for further planting (no asphalt)
- Green roof gardens as distinct from green roofs
- Designate an area as a Green Black Spot so as to address obvious and critical deficiency of greening on a street/corner/thoroughfare/village centre
- Green Blue Spots: canal banks, open up access to canals from residential streets, water side board walks, restore fishing steps, boat/barge stops
- Linear Parks/Meridian Parks along Luas lines and canal banks, meridians of main roads

A 'Green Micro Area Zone' designation or category could allow for specific designation within communities, local area plans or even within planning applications and would hopefully facilitate more community led greening and involvement. The intention in the Development Plan needs to be more robust around specifying a set of 'Green Micro Area Zone' designations as planning tools.

Chapter 13 Strategic Development Regeneration Areas, SDRA 15 Liberties:

Guiding Principles for Key Opportunity Sites:

Digital Hub The Digital Hub lands represent a significant regeneration opportunity in the SWIC area. As part of their future redevelopment, the provision of two north-south pedestrian connections, identified in the Guiding Principles Map, should be delivered. These should remain accessible to the wider public at all hours of the day. The lands contain a number of Protected Structures and also buildings that contribute greatly to the character of Thomas St. Their presence should inform the future character of the redeveloped lands. In this area, base heights should be 6-8 storeys, where heritage, built form character and residential amenity considerations allow, while additional heights at the identified locations could reach 10-12 storeys. Given the scale of this landholding, it is appropriate that a masterplan be prepared for the entire area, to address the above matters in

addition to planned phasing. Any masterplan should also provide for the delivery of enterprise and employment uses in this area. A public space around St Patrick's Tower should be delivered in any redevelopment of the site. A community/cultural facility should be incorporated into any redevelopment of the lands.

A community and civic hub will be delivered as part of any redevelopment of the school site and lands on School Street

In Support of the Zoning of the Council Owned Lands at Marrowbone Lane Dublin 8 to Z9, Greening/Recreational

The South West Inner city, the part of Dublin 8 that is between the canals, has the worst provision of green spaces, parks and sports facilities in the whole of Dublin City.

This is despite the fact that it is very densely populated, there are several schools and lots of sports clubs and teams. There are lots of families and young people but there are very few facilities and very little for our young people to do.

We welcome future development of the municipal playing facility at Donore avenue however, the simple fact is this still will not be enough.

There is very little public open green space in the Liberties, considering how dense this part of the city is and considering also the significant number of new high density residential schemes under construction which will bring thousands of new residents and visitors to the area - from Grand Canal Harbour through the Guinness lands to Newmarket Square across to Player Wills, we estimate an additional at least 6,000 residential units.

However: Green Space per person in the area is significantly below the EU average - the South West Inner City is one of the most paved areas in the city - there are ten schools in the area, most of which have limited or no sporting/recreational facilities - a recreational/sporting green amenity in this location would be an important amenity for local schools, workers, sports club teams, residents present and future and tourists.

It is an objective of the Draft Dublin City Development Plan to: ensure equality of access for all citizens to the public parks and open spaces in Dublin City and to promote more open space with increased accessibility and passive surveillance where feasible. In this regard, a city wide range of 2.5ha to 3.6ha of parks per 1,000 population benchmark for green/ recreational space as set out in the 2019 Parks Strategy (or as updated) shall be a policy goal and quality standard (Chapter 10, Draft Development Plan 2022 - 2028, page 369).

To ensure sufficient land is available for sports and recreational facilities in the inner city area and to look to the sustainable development of the area, we support the proposal to designate these lands as zoned for green infrastructure and sports/recreational use. We understand that land in the inner city is at a premium and so this site presents a unique opportunity to develop amenities for the community which are much needed in addition to the provision of housing and depot services as required by Dublin City Council. We support the original proposal as set out by Carson and Crushell Architects 2019 on behalf of Sportling Liberties which proposes a scheme for the 7 acre site providing for 340 homes, a large open multi sports all weather playing pitch AND depot services for the Council.

We live in an area where young people are increasingly exposed to and challenged by social and economic issues which might impact on their educational outcomes and life chances. Sport has long been acknowledged as a key factor in supporting young people to learn life and interpersonal skills and to provide opportunities to engage in positive and life enhancing activities in their communities. All young people, those living here now and those that will be living here in the future, as well as all residents, workers and visitors to the area should have access to the kind of amenities that will support our inner city communities and neighbourhoods to develop sustainably and to thrive. In an era where critical actions must be taken to address issues of climate change, it is imperative that our cities are greened and that we can avail of sporting and recreational amenities within the inner city.

Conclusion

Finally, we note that in the introduction to the plan you state:

"This new development plan creates a platform to facilitate and promote the sustainable, long-term recovery of the city for the benefit of its citizens, the region and the country. It offers an opportunity to respond to these challenges and to build on the success of the significant investment and regeneration seen in the city in recent years".

Your platform, to facilitate the delivery of this ambitious development plan, is a critical component to achieving your objectives across all nine themes. It seems that 'how' this platform works in practice to facilitate and promote citizens engagement and participation to deliver this, including usual and unusual suspects, disparate stakeholders across Civil Society, Academia, Business, and Education is not clearly illustrated.

To succeed in regenerating our communities through the Dublin Development Plan requires a governance framework to put those with the lived experience of the challenges identified under each theme, to the fore. RECDP are willing to facilitate direct community input into the plan-and implementation of various aspects of the plan- in order to ensure that this is achieved

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