

Roebuck Residents' Association Submission – Pre Draft CPD 2022-2026

27/2/20

People, Home and Place

1. Protection Afforded to Institutional Lands Needs to be Strengthened

Institutional Objective:

There is currently some ambiguity around the “Institutional” Objective that is applied to approximately 47 sites within the DLR area. The recent High Court Judicial Review relating to the site at the rear of the Our Lady's Grove campus in Goatstown, highlighted the fact that this Objective does not appear to have the same “weight” as standard zoning criteria. The criteria attached to this Objective are critical when it comes to appropriate development of these sites, (i.e. Density RES5, Public Open Space 25%, School Expansion etc.).

Dublin City Council has a distinct zoning type for Institutional land (Z15, Community & Institutional Lands), DLR should follow suit so as to avoid any doubt regarding the planning criteria associated with these sites.

It is the Council's Responsibility to Protect School Lands:

Currently, when it comes to planning applications on school lands, the onus tends to be put back on the Department of Education to determine if the land is required by the school or not. The Department of Education is not properly resourced, nor mandated, to determine the planning needs of a particular area. School land, especially public schools' land, is frequently used by the local community for many different uses. It is not just used by the school itself. There should be no ambiguity around the extent of the Council's responsibility to give protection to these lands. Depending on the Department of Education to determine if this land is required or not, is not appropriate.

Religious orders are selling off land throughout the city and county, and the current planning system in DLR does not provide enough protection to affected lands. Many of these lands are effectively community assets that have been used by local communities for many decades.

2. Downsizer/ Elderly Accommodation

There is a scarcity of suitable accommodation types for downsizers in DLR. An approach along the lines of creating targeted zoned areas (areas within short walking distance of village/town centres) for this type of development should be considered. Alternatively or additionally, a percentage of each new development could be given over to “downsizer-friendly” accommodation (similar to the percentage required for social housing).

Criteria such as smooth non-slip paving, furnished residents' common room, suitable outdoor space

for those with mobility issues, pet friendly accommodation etc. should be added to planning requirements.

Many elderly residents would be willing to move out of large houses in the DLR area, however due to a lack of suitable smaller accommodation in their area, they cannot.

3. Priority Should be Given to Preserving Enough Green Open Space for the Growing Population in DLR

Increased high density residential development, in particular driven by the SHD process, is leading to concentrated population growth in particular areas. Consideration is not being given to adequately sized nearby green open space for these new concentrations of population. Accessible green open space is necessary for both physical and mental health.

4. Priority Should be Given to Ensuring there are Adequate Leisure Facilities for the Increasing population in DLR

Municipal/Community:

There is a need for increased municipal leisure facilities (swimming pools, sports centres, MUGAs, playgrounds etc.), especially in the west side of the county. The dearth of community resources in this area was highlighted in the Nexus report commissioned by the Council a couple of years ago. This should be tackled and remedied by ambitions laid out in the next CDP.

Commercial:

As well as ensuring there are adequate community-run leisure facilities, steps should also be taken to ensure that privately owned and run leisure facilities are not priced out of areas. In areas of high residential or retail development, a percentage of the land/development should be for the exclusive use of commercial leisure providers, e.g. bowling alley, play centres, climbing walls, squash courts, roller rinks, pool halls etc.

5. Waste Management

Dog fouling is a big issue in the County. It does not appear to be tackled in any meaningful way. An increase in the number of wardens would be appropriate, as would the installation of dog waste bins across the County. Other Dublin Councils use these bins, why not DLR? The budget for this issue currently supports paying for ads in the cinema. It would be more effective to use this budget to install bins, or to support local groups through the provision of biodegradable marking spray etc.

6. Place Marking Signage

Installation of signage to denote areas, e.g. a "welcome to xxxx" street marker. Dublin City Council has done this in many areas in its jurisdiction. Currently the only way to get a place marker in the DLR area is through fund raising via community groups, such as Tidy Towns. However the Council itself should be sponsoring and promoting this place-making initiative.

7. Public Art

We would like to see more public art in DLR, and in particular the roll out of street art, using organisations such as Dublin Canvas to decorate signal boxes etc. Why does this not exist in DLR, when DCC and SCDCC both do it?

Climate Action and Energy Efficiency

1. Community-Based Energy Projects and Support

We would like to see support from the Council for initiatives to help and advise residents with regard to energy efficiency, access to funding, and the possibility of communal energy projects. The Council should play a large role in mentoring community groups in this regard.

2. LED Street Lights

All street lights, and public lighting should use LED bulbs.

3. Drinking Fountains

Installation of drinking fountains at all sports grounds/ playgrounds.

Strategic Environmental Assessment & Appropriate Assessment

1. Private Development's Role in the Decline in Biodiversity

DLRCoCo is to be commended for stopping use of weed killer pesticides. However there are no restrictions in place to stop private developers using pesticides while clearing sites, and maintaining cleared sites, prior to development. Due to planning and financing issues, the period between buying a site and developing it can be years. During which time the site clearance is typically maintained through use of pesticides and heavy machinery.

Private development should take on more responsibility for reversing the decline in biodiversity. Conditions should be laid down in the planning process to restrict use of pesticides in clearing sites, and also to force a rethink of the practice of site-wide destruction of habitat (pollinator and wild animal friendly native hedges, trees etc.) that is the norm in all medium to large development projects. Penalties or inducements should be considered to force a reduction of this habitat destruction, and instead to accommodate existing wild habitat in new development schemes.

Sustainable Movement & Transport

Sustainable Development

The current proportion of land and road space allocated to private vehicle (usually single occupancy ones) travel/parking is excessive and unsustainable. As such we believe it is important that we re-orientate public space away from the private car. We recognise this can be a difficult and slow process. Which is why we believe it to be vitally important that we make sure that FUTURE development does not add to the problem. With that in mind we propose the following:

Making future development more sustainable:

- Ban on above ground parking in new developments of 10+ apartments. Save for drop off points, disabled parking and car clubs.
- A commitment to make any new schools/workplaces car free (above ground) save for drop off points, disabled parking, emergency vehicle access and car share clubs.
- Mandatory that new developments 10+ remove (not add) vehicle permeability (if possible) save for emergency vehicle access, as a condition of planning.
- Mandatory that new developments 10+ provide pedestrian and cycling permeability, to surrounding areas, as a condition of planning.

Making current land use sustainable:

- Change parking provision in new developments to 'maximum' per unit. As opposed to recommended/minimum. Set targets for reducing said Maximum over time.
- Audit and set 'reduction targets' for the provision of public parking and returning land to park/pedestrian/cycling use. Specific sub targets for major providers e.g. UCD
- Targets for reducing 'free parking' within the county. Return to sustainable travel or green space where possible.
- Program for changing cycling cow gates so as to accommodate cargo bikes.
- Program for modifying speed bumps to allow for bikes to cut through.
- Program for introduction of raised zebra crossings (New and replacement for pedestrian 'beg button' arrangements).
- Extension of pedestrian 'green man time' at all crossings not converted to same.
- Commitment to end all double pedestrian crossing I.e. where a pedestrian has to wait for 2 separate green men lights, one initially and the other in a traffic island, in order to cross 1 road.
- Redesign of the most hostile junctions in the area. e.g. Dundrum and Goatstown junctions are very hostile to people. A reallocation of space is needed in a lot of similar junctions throughout the county. Footpaths need widening. Road narrowing (lane removals). Cycle lanes added. Pedestrian wait times reduced.

Speeding Enforcement and reduction.

- While the roll-out of 30kmh zones are to be welcomed. A program of infrastructure changes to assist with compliance is required. As most vehicles break this limit. Especially those 'rat running'. Road narrowing. Speed bumps etc...
- A program of automated speeding cameras within the area.
- Reduce speeds outside schools and on approach to 30kmh . Add speed calming infrastructure and automated enforcement to ensure compliance.

Illegal Parking

- Tackle the problem of illegal parking in the County. Careless drivers can currently operate with

impunity.

- Increase warden visits and fines for illegal parking, including parking on grass verges.
- Infrastructure where required. e.g. bollards.
- An app for reporting footpaths and cycle lanes obstructed by parked cars.