

**DRAFT**  
**SOCIETY OF CHARTERED SURVEYORS SUBMISSION**

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28 March 2008

**Re: Maximising the City's Potential: A Strategy for Intensification and Height – Submission from the Society of Chartered Surveyors.**

A Chara,

The Society of Chartered Surveyors broadly welcomes the Dublin City Council's Draft Strategy for managing and delivering higher density development in Dublin City, in order to achieve a **compact urban form at the heart of the region**.

The Council correctly identifies the need for Dublin to continue **to grow and operate on an international scale while at the same time retaining the essential character of the place and providing for the needs of residents, workers and visitors alike**.

The overall policy thrust of the Draft Strategy represents a logical extension of current Development Plan policy in relation to density.

**USE OF NON-STATUTORY FRAMEWORK PLANS**

The strategy identifies a large number of areas where high buildings or clusters of high buildings may be located. Apart from the general development control standards set out in Chapter 15.6 of the Development Plan, the strategy places a heavy reliance on the use of localised non-statutory framework plans to determine development proposals. It appears that it is the Council's intent that each framework plan will have its own localised guidance on density and height. The Society would wish to see that such plans are sensitive to the concerns of local residents and the local community, particularly in non-city centre sites.

The strategy calls for some 31 separate framework plans to be purchased. The current capacity of the Planning Department to deliver these plans to the market in a timely manner must be questioned. In the meantime how does the City Council propose to respond to market demands for high buildings?

The recent failure of the Executive and Elected Members of the Council to agree on a plan for Ballsbridge has left a planning vacuum, within which two major development proposals were determined.

The Society is not supportive of the strategy's reliance on non-statutory framework plans, notwithstanding the Council's intent to incorporate policy elements into the Development Plan by way of a variation to the Plan. The SCS would favour the utilisation of Statutory Local Area Plans, which introduces a higher degree of certainty to the development process. We note that the Draft Planning Guidelines on **“Sustainable Residential Development in Urban Areas”**, DoEHLG February 2008, Chapter 2.13, do not encourage the use of non-statutory plans because **“such plans may lack the opportunity for public consultation, and do not benefit from the statutory backing which applies to local area plans or SDZ's”**. The non-statutory framework plans, with which the Council intends to operate the strategy would, we submit, provide less transparency, more subjectivity and less certainty than a LAP based approach.

#### **ABSENCE OF CITYWIDE OR REGIONAL PERSPECTIVE**

The emphasis on local context framework plans highlights the absence of a citywide or regional perspective in relation to high buildings. The strategy fails to identify panoramas, river prospects, townscape views or linear views within and without the City of Dublin, which are sensitive and which need particular protection.

The SCS suggests that attention needs to be paid to this issue if there is to be consistency in the visual assessment of high-rise buildings. The City of London has addressed this issue by identifying a series of protected vistas and publishing a supplement to the London Plan, which provides planning guidance on high-rise development proposals. **“The London View Management Framework”** provides technical guidance to built environment professionals on the use of Qualitative Visual Assessment techniques and the Management of Protected Vistas by Geometric Definition. This approach has the merits of clearly identifying strategic views, vistas and townscapes that are important to the City's natural and built environment and providing a City wide and **objective** means of assessing the potential impact of a development proposal.

It is not clear from the strategy's approach if proposals for high buildings will consider assessment criteria beyond the immediate local framework plan.

It is evident that the surrounding Local Authorities that comprise the Dublin Region will also wish to consider the development of high rise structures for reasons related to regeneration, marking gateways, high density transport centres or prestige. We

suggest that there needs to be joined thinking in relation to high buildings, on a Regional basis.

A coordinated regional approach must also include the statutory development agencies of Dublin Dockland Authority, Ballymun Regeneration and the Grangegorman Development Agency.

Apart from the visual impact of high-rise buildings and high-rise clusters on the City and Regional skyline, there are also city and regional implications for public infrastructure capacity.

#### **PUBLIC INFRASTRUCTURE CAPACITY**

It is not evident that the strategy, in advocating particular locations for high rise clusters, has considered the capacity of the existing or proposed public transport infrastructure to support the proposed levels of density at peak travel hours. Such strategic policy decisions have a bearing on the RPA choice of metro system, light rail Vø heavy rail, and a direct bearing on tunnel design and tunnel widths.

Higher densities will also place greater pressure on all public services and public infrastructure, not just public transport. The Council and the statutory development agencies need to address the impact of higher densities on water demand, drainage, fire services, public open space provision, and other necessary public services from the outset.

#### **GENERAL COMMENTS**

The strategy speaks of **protecting the bowl of the inner city**, the area between the Royal and Grand Canal. Yet, six (6) of the eight High Intensity Clusters identified in the strategy lie within the inner city and the remaining two are located directly adjoining the inner city in Docklands. This appears to be a fundamentally inconsistent strategy platform.

In relation to the **Western Clusters** the general height proposed, apart from specific sites, is 4 to 6 storeys. Having regard to the fact that Heuston is a major transport hub, there appears to be logic to providing for higher general densities in this cluster. A general height of 4 to 8 storeys would be commensurate with heights to be allowed in the City's historic core, subject to local context. This logic should also be considered in relation to the other high intensity clusters.

The designation or identification of particular sites for higher density development confers a significant increase in localised property values. It is critical that the process by which potential high rise or high intensity cluster sites are identified is transparent and that the process is seen to evaluate alternative strategies and alternative sites. The strategy advanced in this draft document does not examine alternative strategies. This is a weakness that should be addressed going forward.

## CONCLUSION

The regulation of the impact of high-rise buildings is critical for the conservation of the built heritage of Dublin. If Dublin is to retain its distinctive inner city character, tall building development proposals that are significantly higher than their immediate context need to be assessed, both in terms of their impact on their immediate surroundings and their impact at the wider city scale.

It is also important that the regulatory process be clearly defined and transparent. The proposed reliance on non-statutory framework plans is an approach to urban place making that the DoEHLG does not advocate. The Society is of the view that the Council's strategy should be underpinned by a coordinated Regional approach and should be operated by reference to Statutory Local Area Plans.

Yours sincerely,

**FELIX MCKENNA, PRESIDENT.  
SOCIETY OF CHARTERED SURVEYORS**