



AN BORD PLEANÁLA

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Ms. Lisa Quinn
Executive Officer
An Bord Pleanála
64 Marlborough St.
Dublin 1
D01 V902

Case Number: ABP – 312602-22; Planning Authority Reference Number: 2861/21

312603

Dear Ms. Quinn

Thank you for your letter of 13th December in relation to the above referenced case.

Dublin Town is familiar with the provisions of the Dublin Development Plan and engaged extensively in the consultation process in relation to same.

We are of the view that the contents of our submission are not altered by the adoption of the Dublin Development Plan by Dublin City Council. We believe that the proposed development is essential if the future of the city's north side commercial core is to be maintained. The district has suffered in recent years and needs a catalyst to revive growth and to re-engage the public. The public perceptions in relation to safety are poor on the city's northside. The extent of dereliction no doubt plays a part in this perception. It also has to be noted that the district needs new and vibrant businesses which will be able to sustain footfall and attract new customers to the district. We also need to ensure that the tourism imbalance, whereby tourist spend is approximately 5 times greater on the south side compared to the north side needs to be addressed. The mixed use development proposed by the scheme under consideration will assist in creating a more inclusive and engaging district.

In short, we believe that the proposed Dublin Central development achieves much of what is required to regenerate the city's northern commercial core and will, we believe, re-engage the public by changing current negative perceptions.

Dublin Town has not been presented with any other proposals which we believe would create the level of sustained footfall and vibrancy required to regenerate the area. We believe that the current proposals would help future proof the city's northern commercial core. It will also act as a bridge between the commercial core and the proposed Parnell Square development.

Chairman

Ray Hernan

Secretary

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Treasurer

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Directors

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We would make the following observations in relation to the Dublin Development Plan as it pertains to the proposed Dublin Central Development.

Chapter 4: Shape and structure of the city

Dublin Town supports the ambitions set out in this chapter of the plan and believe that the proposals under consideration will assist in achieving the relevant objectives

- High Quality Placemaking
 - Liveable and inclusive
 - Resilient and environmentally sustainable
 - Healthy, integrated and connected
 - Compact and efficient in its use of resources
 - Strong economically with a vibrant cultural life

We believe the plan will enhance the city's vibrancy, while the housing of the O'Connell St. metro station will accommodate and consolidate public transport use.

Cities offer the best opportunities for developing sustainable options in terms of district heating, public transport use and high density development. In this context, it is counter productive to allow a significant element of the core city centre remain largely under-utilised.

We believe that the proposals are sympathetic to the city's history and character and with the district's architectural heritage.

The development plan supports brown field development and the development of under-utilised sites along key public transport corridors. We believe the current proposals achieve these objectives directly.

Chapter 5: Quality Housing and Sustainable Neighbourhoods

- The addition of 79 apartments within the mixed use development is something that Dublin Town supports.
- We believe that well maintained and cared for build to let is appropriate for the area and will provide quality accommodation for employees in the general area including the IFSC which is easily accessible via active travel and the LUAS red line.
- Such build to let accommodation is common place in other comparative cities.

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Chapter 6: City Economy and Enterprise

- Tourism spend is five times greater on the city's south side when compared to its north side. In this context, a rebalancing is required. Given, anticipated increases in tourist engagement we believe that additional visitor accommodation is required on the city's northside.
- We further support the provision of cultural/gallery use together with additional restaurant provision which will assist in maintaining tourist engagement.
- In addition, other elements of the Dublin Central proposals such as open green and meeting spaces is entirely consistent with emerging city use, which has seen a substantial increase in the number of people using the city as a meeting place. This must be accommodated.

Chapter 7: The City Centre, Urban Villages and Retail

- Dublin Town has observed the trend towards shopping and socialising as part of a trip to the city centre. While the north side has a strong retail offering, its restaurant and leisure offering could be strengthened. We believe that the current proposals will add to the overall offering and in this regard will increase its desirability as a retail location, thereby assisting in the safeguarding of currently vulnerable retail offerings.
- The above will assist in cementing the primacy of the city in the retail hierarchy. This is important from a sustainability perspective given that 80% of city customers use public transport to access the destination. Out of town shopping malls are the mirror opposite with almost 80% using private cars.

Chapter 8 Sustainable movement and transport

- As noted above 80% of city customers use public transport to access the destination. Out of town shopping malls are the mirror opposite with almost 80% using private cars. Therefore the strengthening of the city given its public transport access is essential if we are to achieve the targeted reduction of 51% in transport related carbon emissions.
- The facilitating of the O'Connell St. metro stop will also add to public transport connectivity, given the intersection of the LUAS Green and Red lines nearby and the extensive use of O'Connell St. as a key bus corridor.

Chapter 11 Built heritage and archaeology

- We believe that the proposed building design is consistent and sympathetic with the general area's architectural heritage.

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Chapter 12 Culture

- Dublin Town sees considerable scope for using the arts and culture in the regeneration of the city's north side given the presence of the Abbey and Gate Theatres, Savoy Cinema and GPO Museum in the district. We welcome the inclusion of a cultural/gallery space in the current proposals which we believe will augment the arts/cultural offering and will better connect the O'Connell/Henry St. district with Abbey St. and also with the proposed cultural developments proposed for Parnell Square.

Chapter 13 Strategic development regeneration areas

- The proposed development is within the NEIC regeneration area. It is currently underperforming and needs investment to reach its potential.
- We believe that care has been given to protecting the historical buildings which played a role in the 1916 rising. However, we are conscious that Moore Lane and other locations in the area have been redeveloped, often poorly, since 1916 with breeze brick used in construction.
- We welcome the protection of the national monument and revitalization of the areas adjacent to it.
- We believe that the revitalization will assist in the provision of sustainable employment which is a core requirement in the strengthening of the NEIC district.
- The development will assist in providing greater pedestrian connectivity within the general district.

We trust that the above will be given due consideration. We remain available to provide additional comment and supporting information should you consider this beneficial.

Yours sincerely,

Richard Guiney

CEO

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Ruy Hernan

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