

**RATHGAR**  
RESIDENTS ASSOCIATION  
**LINK**  
• MAGAZINE •



**NO.69 MARCH 2022**

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**[www.rathgarresidentsassociation.ie](http://www.rathgarresidentsassociation.ie)**



Difficult to believe that the pandemic entered our lives two years ago now and turned everything upside down.

With the severity of Covid hopefully behind us, it's great to see everyone re-emerge and to have the optimism that spring brings with it.

The volunteers on the RRA committee give their time all year round on a variety of issues. One of the key areas for the last couple of months has been preparing a submission for DCC's draft development plan.

We have reproduced that submission in full here in Link.

We have also just received news that the BusConnects project has been given the green light by government, so we all need to be aware of the plans for the BusCorridor through Rathgar being submitted to An Bord Planeala later in the year.

The volunteers who form our committee continue to work on behalf of everyone in Rathgar to make it the best place to live. If any of you have any ideas and want to help Rathgar to thrive as a community then please get in touch, please join the association and the committee. We are always looking for enthusiastic people to help on short term and more medium term projects.

In the meantime we wish everyone all the best for 2022.

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As Ursula said, we are beginning to see the first signs of spring. The birds are chirping in the early morning, and the daffodils are budding. There's a feeling of growth and rebirth in Rathgar. It was about a year ago that we began our "Let's Keep Rathgar Beautiful" monthly clean ups, and we are so pleased with the progress and success of this program. We have been meeting the first Saturday of the month in the Village Square at Christ Church for most of the last 12 months, and we have an expanding group of volunteers from the Rathgar community and Christ Church community coming to assist us in our endeavours to keep the village and the community looking its best. We began this program with the support of our community and DCC (who provide gloves, brushes and bin bags), and we are hoping that this upcoming year will entice even more volunteers. Many in the community have done their part to make this an enjoyable experience- and we would like to thank Bijou in particular for providing us with coffee/tea and pastries during our clean ups. We are all aware that a little bit of help on everyone's' part can make a big difference, so we encourage you to join us if and when you are able.

We are also excited to highlight some of this past year's accomplishments including the monthly clean ups, the removal of graffiti in the village, more rubbish bins and the clean-up and painting of the Coman's building. Have a look around! You may notice some of these changes. But perhaps the most special addition to the Rathgar community in 2021 was the added tables/benches to our Village Square! We would also like to extend our heartfelt thanks to Christ Church and Reverend Purvis Campbell for opening up the Village Square to Rathgar- and for coordinating the incredible tables and benches. The addition of those tables has meant so much to the community- and we believe it's helping bring us all together. We would like to note that the clean up of the Village Square is our joint responsibility. We ask that people kindly pick up after themselves- and we would love to see volunteers offering to clean the tables on a weekly basis. Please get in touch with us if you are able to help in any way.

As a new year begins, we look forward to greater changes and improvements in Rathgar. We are hoping that the most difficult times are behind us, and we are all eager to continue to make our village one that is a pleasure to live and relax in. Thank you to all who have helped us get to this point, and we are looking forward to seeing more of you in our upcoming community get-togethers.

Christy Carty, Environmental Officer.

As Christy says we are striving to maintain and improve the village but Paddy Maron, a stalwart of the RRA has taken a look back and has curated some of Rathgar's Places, People and Happenings that have informed Rathgar's Story.



### **THE ANCIENT CASTLE AT RATHGAR**

A water colour print of the ruins by the Dutch born artist Gabriel Berenger 1729-1817. The castle stood on the site of today's St Lukes Hospital. Berenger had been commissioned by Charles Vallancey and William Conyngham (Lord Mountcharles) to paint a series on the antiquities of Ireland. Berenger is buried in the Hugeneot cemetery, Merrion Row. Sometime later the ruins were removed and Rathgar House was built there. During the tempestuous year of the 1798 rebellion, the house was raided and a gardener named Daniel Carroll was killed. Three local men Kelly, Rooney and O'Donnell were tried, convicted and hanged at Terenure cross roads. There, their corpses were exposed for a period of time before being sent to Surgeons Hall for dissection.



### **THE OLD QUARRY**

The site of today's Herzog Park and Rathgar Tennis Club was in the 19<sup>th</sup> century, the location of a calp limestone quarry. This stone was used extensively in the development of the area. Many of the rear garden walls in Rathgar used this stone. To keep the water levels in control, a windmill powered pump was used. The quarry which had been worked out, was drained and filled in the mid 1950s. The windmill's location is probably the site of Stratford College. This picture is the work of George Petrie (1790-1866). Petrie was an antiquarian and archaeologist. He was employed on the first phase of the Ordnance Survey (1834); recording and sketching antiquities. He is buried in Mount Jerome cemetery.



### **MURDER MOST FOUL**

Ely Gate on the banks of the Dodder near Orwell park, was once the entrance to Rathfarnham Castle. The entrance gate in the form of a Roman triumphal arch, was erected in the early part 19<sup>th</sup> century by Charles, Lord Ely, who for his vote and influence in getting the Act of Union passed, received a step up in the peerage to become a marquis and £45,000 in cash. This quiet spot was, in 1841, the scene of a crime which excited an extraordinary degree of interest in Dublin. On the night of the 27<sup>th</sup> February, an Italian named Domenica Garlibardo, an organ-grinder, was murdered and his body thrown on the waste ground in front of Lord Ely's gate, where it was found next morning by a policeman.



## ENJOYING THE DODDER IN OLDEN DAYS

The Dodder at Orwell bridge was a cold place in winters in the 1880s but obviously these men were enjoying the wintry scene .



But then the Dodder could also be an enjoyable place in summer time. Time for a picnic to the background music of the water flowing over the weir.

## A PAST TREASURE



The late Tommy Cronin in an interview for *Link December 2010*, recalled some local shops and characters during his forty years in Rathgar. He recalled Miss Doris Orr's fruit and vegetable shop across from the Gourmet, Davis' well known newsagents, Donovans' butchers, Byrne's

butchers(still in business), Kershaws pork butchers on Terenure Road East,. Deveney's off licence and grocery, Callaly's electrical shop, Paddy Quigley's hardware and Brochelbanks car showrooms on Highfield Road Others on his list were Hayes Conyngham, chemist on the corner of Highfield and Orwell Roads and Gardiner's chemist shop just across the road. Next door to Gardiner's was Bodkin's Kiddicraft and further along Clancy Brothers -Kevin, Domnick and Gerry's grocery shop.. Penelope's cake shop run by the Sheridan family was a well known land mark for many years. Keeleys of course, was owned and run by Mrs Horton. George' s garage was also an important element of the mix of businesses. Frequent visitors to the Gourmet were Douglas Gageby, Ulick O Connor, Dennis O Dea and Michael who " *frequently stopped customers on their way in to sing them a song and if a lady, to kiss her hand.*"



## THE RATHGAR LANDMARK.

At the centre of Rathgar village with its striking architecture is Christ Church. Designed by Andrew Heiton whose work also included Findlaters Church in Parnell Square Built in the 14<sup>th</sup> century French Gothic style, work commenced in 1860 to provide a place of worship for the local Presbyterian community. Of particular note in its stained glass is *St Peter preaching to the Jews* by Wilhelmina Geddes who worked with Sarah Purser at An Tur Gloine. They were at the head of the Irish Arts and craft movement and 20<sup>th</sup> century stained glass revival. Christ Church still provides for its community of worshippers but also extends itself generously to the whole Rathgar community. It became a place of openness during the recent lockdowns



## RATHGAR'S GREAT HISTORIAN

Freddie Dixon was our great local historian. His "The History of Rathgar" was published posthumously. Associated with RRA over many years, he published the chronology of the developing Rathgar area in Link magazine (February 1984).

Rathgar Road was first shown on Taylors map published in 1816 and was then known as "New Road": with only one house indicated. The subsequent development of the road took place in a series of successive terraces. The present numbering was introduced in 1866.

Some examples of terrace names and construction dates with subsequent numbering are:-

1833 Spire View 31-43	1855 Garville Villa 62-63	1835 Garville 65-70
1850 Rosamond 54-56	1835 Garville Tce 67-61	1850 Alma Villas 188-192
1838 Cambridge Tce 161-171	1850s Annesley Tce 27-29	1838 Salisbury Villas 142-147
1850 Delhi Terrace 193-195	1838 Pearemount 116-123	1850 Everleigh 52-53



## 53 RATHGAR ROAD

It was here in the home of Dr Seamus Kelly on learning that Roger Casement had been arrested and the landed arms confiscated, that the Chief of Staff of the IRA -Eoin Mc Neill with Arthur Griffiths and others met on Easter Saturday 22nd of April 1916 and decided to countermand the planned Rising. Mc Neill travelled to the offices of the

Independent in Middle Abbey Street to place the countermanding notice. The Rising however went ahead on Easter Monday



## HIGH SCHOOL (THEN IN HARCOURT STREET)

W.B. Yeats entered the school in 1881. Yeats found the school rather different from the one he had attended in London: "Here....nobody gave any thought to decorum....on the other hand there was no bullying, and I had no thought that boys could work so hard. Cricket and football, the collecting of moths and butterflies, though not forbidden,

were discouraged." Yeats was mainly interested in natural history, but was weak at English literature. He had a difficulty with spelling but his contemporaries noted the quality of his essays. He received a prize in English in 1883 and seems to have begun writing poetry at about that time.



## **70 RATHGAR ROAD**

James Drumm DSc who was first chairman of Rathgar Residents Association, lived here. He invented the Drumm battery which could be charged more quickly than an acid battery. It was introduced in 1931 as the power source for the Dublin Bray Line. However, it failed to live up to expectation



## **PLANE CRASH IN TERENCE ROAD EAST**

In 1934 an aeroplane piloted by a Mr Russell who lived at 46 Terenure Road East crashed in trees across the Road behind No 30. There were no fatalities.



## **IRA SHOOT OUT**

No 98a Rathgar Road was the training headquarters of an IRA unit in 1940 and was raided by detectives in August of that year. In the shoot out two detectives were killed before arrests were made. Three members of the IRA were arrested tried and convicted. All were sentenced to death.



## **SIXTY YEARS AGO, JIMMY O'DEA SANG THE VIRTUES OF RATHGAR OH, ITS LOVELY TO BE LIVING IN RATHGAR**

There are some quite decent suburbs I'm sure  
Oh, Rathmines is not so bad or Terenure  
Oh, we have heard of spots like Inchicore  
But really don't know where they are.  
For thank heaven, we are living in Rathgar



In terms of planning, your Association is still concerned at the worrying direction that the planning process had taken over recent years and the impossible situation that local communities and residents groups are increasingly finding themselves in. Local rights are being ignored, local amenities are being compromised: resultant traffic build up is being ignored. Every neighbourhood is potentially under threat from over development, high rise apartments, lack of green amenity space and sports facilities.

Many residents' groups have had to take the difficult and expensive route to the courts where some respite from the advance of the developers and planners was obtained. But have no doubt this can only be a temporary respite.

Frank McDonald previous correspondent for the Irish Times, has more than adequately set out the problems for the future of our city due to a lack of foresight by our planners, in his recently published book *A Little History of the Future of Dublin*.

The Dublin Democratic Planning Alliance. Email: [info@ddpa.ie/ddpa.ie](mailto:info@ddpa.ie/ddpa.ie) (An alliance of 47 Residents Groups. The Rathgar Residents Association has affiliated itself to this group) has circulated all Oireachtas members with a view to emphasising how Specific Planning Policy Requirements introduced by ministerial order has debased local councils authority (and elected councillors role in planning) and the rights of ordinary citizens to have a voice on the sort of developments that should happen in their neighbourhood.

The aims of the alliance is

- The repeal the Strategic Housing Development process and mandatory Ministerial Guidelines on Heights and Apartment standards, including those relating to Build To Rent (BTR).
- To promote balanced, sustainable, long term housing development for rental or purchase, that meets the needs of our communities.
- To contribute to the debate about the Land Development Agency and the Commoditisation / Monetisation of the Irish Housing Market.
- To work together to further our common aims.
- To be a voice for the inhabitants of our city in influencing its future development in a sustainable, community based fashion.
- To be the voice of the community when lobbying Government in their housing/planning decision-making.

## Local planning cases

Since the latest report in June last, the planning committee of your Association has reviewed week by week planning applications within the Rathgar Area and also significant planning applications across the city which if approved might set an undesirable precedent for the future of our area.

Below are some of the proposed developments which were reviewed or submissions made by the RRA and decisions made by Dublin City Council and/or An Bord Pleanála.

**28/30 Rathmines Park**(formerly 2nd Church Christ Scientist): Demolish, build 40 apartments 4/5 storeys. **Permission refused by DCC**

**46 Garville Lane:** mews 3 storeys. DCC refused permission on grounds of inappropriate design. New submission made and permission granted

**348 Harolds X Road** (Kenilworth Motors site): 52 Apartments to rent 3/5 storeys; **permission granted.**

**5 Winton Avenue** permission for large extension(40%) **DCC required modification and then granted.**

**5 Villiers Rd** Permission for off street parking: **Refused by DCC**

**10&12 Winton Road.** Permission for off street parking **Refused by DCC .**  
**Now appealed**

**7/8 Templemore Ave** Off street parking **DCC Grant permission**  
**Now appealed**

**22 Garville Av** Renovate+Off Street parking **DCC Refused off street**

**5 Leicester Ave** Off Street parking **Await Decision DCC**

**Murphy Gunn Miltown** Build to rent 96 APTS **NB M&G site Rathgar Avenue**  
3/6 storeys **are on the market.**

**Trinity Hall, Dartry** new Application -strategic development  
358 student units,4/blocks 4/8 storeys  
Contravening Development Plan **Await decision ABB**

**Rear 139 Rathgar Road** House to rear at Garville Rd **Await decision DCC**

## **Paddy made reference to it and one of our key committee members John McMahon gives his take on Frank McDonald's recent book:**

On 27th July 1662 James, Duke of Ormond, one of the Butlers of Kilkenny, stepped ashore a sand bank in Dublin Bay to assume his role as Viceroy of Ireland on behalf of King Charles II. He had lost the battle of Rathmines in 1649 to Cromwell's Roundheads and emigrated to live in exile with the Charles.

This is the opening to Frank McDonald's book "A Little History of Dublin," published last year.

The Duke had a vision for improving Dublin and the royal authority to carry out works. He planned new Liffey quays, ordered houses to face the river rather than turn their backs on it, Ormond Quays, the Phoenix Park and the Royal Hospital at Kilmainham. An impressive legacy. Mind you, he was an of the ruling class of the day which simplified planning permissions etc.

In the eighteenth century, the Wide Streets Commission had the authority to compulsorily impose new wider streets replacing the original medieval lanes and narrow streets. New squares with distinguished houses appeared to accommodate wealthy owners and landlords and their families on visits to Dublin. The Georgian pattern appeared.

In the nineteenth century there was less progress and towards the end of the century an influx of population led to dreadful tenements in what were the houses of the landed gentry, since departed to London.

In the twentieth century the Corporation built estates on the south and north sides of the city to relieve over-population in the centre of the city. During the last part of the century, the population and their incomes increased though there remained considerable homelessness.

And in the twenty-first century we have seen the trend towards high rise and replacement of houses with apartments in large blocks dotted around the city and suburbs. But the role of the city centre is unsure as concepts like the 15-minute walking/village are discussed and transport congestion is a stumbling issue for all major cities.

So, what of the future? McDonald has views on what should happen.

He covers a list of topics which in his view need tackling, climate change, defences of the Dublin Bay shoreline, the role of the Port Authority, housing and high-rise developments, energy and electricity power generation, new water supply from the Shannon, the circular economy and recycling, lack of adequate public transport, congestion of the city with traffic, pollution and greenhouse gases, the impact of the internet on running services.

An overarching issue is the structure of Dublin's management. The city is currently organised into four councils when one body could do the job of running the city and dealing more effectively with the issues he lists. Ideally, he would like to see a Mayor of Dublin with strong administrative power and a budget to match. There are plans to hold a Dublin Citizens Assembly on the nature and power of a directly elected Mayor. In the light of the experience of Limerick which voted to have an elected Mayor and is still awaiting implementation with definition of the Mayor's power, McDonald is not particularly optimistic about the impact of such a Citizens Assembly. The population at large is somewhat apathetic about the running of the city and without a strong public demand, national politicians will not cede power to a new body or Mayor.

McDonald is seriously exercised by the issuing of mandatory Ministerial guidelines in recent years. These guidelines override the development plans of the council. So, in effect, there is a serious democratic deficit when it comes to planning permissions between the mandatory Ministerial guidelines and the permission for 100+ unit developments to seek permission from An Bord Pleanála which have been the source of a number of High Court appeals. This is an unsatisfactory manner for dealing with permissions which will have a tremendous impact on the built structure of the future city of Dublin.

Rathgar Road is just two hundred years old. It has seen the development of its striking Victorian houses with their desirable architectural features and a number of public buildings such as the churches in the area. The twentieth century saw the start of the infilling of vacant areas with houses initially and more recently, apartment blocks. During the last century Rathgar became a conduit for travel to and from the city. Traffic impacts significantly on the character of the neighbourhood. Parking can be a problem.

What is the future for Rathgar? Undoubtedly, climate change will change how we live, play and interact, socialise and work. Our houses are destined to be better insulated, use less power/energy, public transport is promised to interrupt the steady increase in privately owned vehicles. Our planners continue to permit higher and higher blocks of apartments. The Rathgar Business Association is reinvigorating the village of Rathgar and encouraging more local services.

Public services such as cleaner streets and roads, removal of leaves etc, creating and proper maintenance of amenities such as greens spaces and parks are important. With better feed-back either from bodies such as RRA or from AI, internet driven sensors and public cameras supplying information back to them, should enable the authorities to work to higher standards in the years ahead.

With better communications between citizens and the authorities it should be possible to see an ever-improving Rathgar in appearance and in amenities for public use. However, the issue of planning is a vexed one. Development in an expanding city and particularly in a suburb just three miles from the city centre. On the other hand, is NIMBYism and we have to tread a fine line between the two.

The Dublin Democratic Planning Alliance is a consortium of 60 local Residents Associations in Dublin created to lobby DCC on the new draft development plan which runs to 800 pages. Its “a mammoth production” says McDonald. Deadline for submissions is 14 February 2022. It’s a tall order for voluntary organisations to tackle and comment upon.



YOU'RE NOT ALONE

**CALL OUR NATIONAL SUPPORT LINE ON  
0818 222 024 FROM 8AM-8PM, SEVEN DAYS A WEEK**

The Residents Association  
are always looking for volunteers  
who have enthusiasm for the village  
and are willing to give any  
time and/or experience to help make  
Rathgar the best place to live.

The Rathgar Residents Association (RRA) made a submission to Dublin City Council (DCC) on 11th February 2022 about the draft City Development Plan, 2022-28. The Association recognizes the many achievements of DCC in developing the city as an economic and commercial centre and a pleasant place in which to live; recognizes that at times balancing the two objectives can be challenging; welcomes the continuing commitment to a low-rise city but, regrettably, has a sense from the draft Plan that the commitment to a low rise city is weakening; welcomes the many references to ongoing work by DCC in relation to climate change but notes the discrepancy between the ongoing work and plans to develop the Poolbeg area given that climate science modelling suggests some coastal areas of the city are vulnerable to severe flooding in the coming decades; expresses the RRA's concerns about the BusConnects project; and makes a number of comments about various elements of the Plan, which, while critical, are intended to be helpful to DCC.

### **Draft Development Plan, 2022/2028**

Dear Sirs/Madams,

The Rathgar Residents' Association (RRA) wishes to make the following submission on the draft Development Plan, which has been placed before the citizens of Dublin for their comment and input.

Our Association represents up to 600 households in the Rathgar area.

The Association recognises the many achievements of City councillors, City management and staff over many years in advancing the city as an important economic and commercial centre as well as a pleasant place to live. It also recognises that at times there can be a major challenge in achieving a balance between these two objectives.

The Association also welcomes the continuing commitment in this draft Plan to the idea of Dublin as a low-rise city and only permitting high rise developments in certain areas that are fitting for such development. The Association, regrettably, has a sense from reading the draft Plan that that commitment is a weakening ambition.

Dublin is a low-rise city like many older European cities, including Copenhagen, Paris, Madrid Frankfurt. These cities have maintained their core as low rise entities and have placed any high rise developments well away from that core (it is worth noting that both Paris and Frankfurt do not allow buildings in their inner city to exceed 20m). The essence of Dublin is its low rise character both within the inner city and into its suburbs. That does not mean that it is low density. For instance, it is worth noting that the density of development in Georgian Dublin is 165 dwellings per hectare. This compares with Copenhagen at 170 dwellings per hectare and Amsterdam at between 100/180.

However, we have seen in recent times many breaches of this objective. For instance, the important historic area around Heuston Station, Royal Hospital Kilmainham, Kilmainham Gaol and the view of that area from the Phoenix Park has been irretrievably damaged by a high rise building that overhangs the Royal Hospital and its formal gardens and grounds. Also, in more recent years the developments of multi-storeyed residential blocks on the Clancy Barracks site are greatly intrusive on those views.

Areas of regeneration need to be planned properly with related heights which do not damage the existing built heritage. It doesn't make sense that developer-led, site-driven incongruous developments such as the nine-storey hotel proposed around the Cobblestone pub should have even got to the planning stage. This is due to the Specific Policy Planning requirements, which

has overridden all our planning rules. Compact growth can be achieved without the destruction of the city.

Looking at some other elements of the draft Plan, particularly the thinking, planning and preparation for climate change, the RRA is concerned to note that a major development proposal for the Poolbeg area is now planned. This development of thirty-four (34) hectares has been designated for fast-track planning permission for the construction of nine-storey apartment blocks and up to 100,000 square metres of commercial and retail space, including 3,000 homes and commercial space for 8,000 workers.

Climate change without doubt will present major challenges for the city. Arctic ice melt is forecast to add to sea heights of a metre or more. Increasing rainfall, with more severe storms and increasing tidal surges will most likely inundate existing coastal areas such as Clontarf and Sandymount. **Why then would Dublin City Council management even contemplate a coastal development such as this, which, within the next 15/20 years, is going to be submerged beneath the waters of Dublin Bay, if not all of the time some of the time?**

#### Elements of the plan that would specifically affect the Rathgar area

**We believe that no plan for transport for the city should be left with another agency nor should the impact of the National Transport Authority's (NTA's) proposal for BusConnects be ignored by any plans for the city.**

The RRA fully supports improvements to Dublin's bicycle lanes and public transport network, in particular from an environmental perspective. We strongly believe, however, that Rathgar's heritage and community should not be compromised by BusConnects, which - in its current form - at best promises to save commuters mere seconds in journey times. The price is too high for so little gain: historic railings, trees and curtilages are threatened in our area, particularly on Terenure Road East. Road-widening, which threatens the architectural layout of our streets, is strongly opposed by the Association. Many of our smaller streets and their residents will suffer as a result of increased traffic flows and parking issues. This problem is not exclusive to Rathgar. Many villages across Dublin are at risk of losing their identity due to the current BusConnects design, which is based on outdated and inexplicable road widening. The RRA believes that a comprehensive underground metro would allow Dublin's residents, commuters and visitors to access the city and its environs whilst saving Dublin's built heritage and special character. As a short-term solution there are many changes that could be made to make the current bus system more efficient at no cost to community and villages. These include policies aimed at reducing private cars on our roads, for example, by implementing congestion charges and comprehensive park and ride facilities and also by introducing, without delay, measures to improve bus journey times such as priority bus lights and cashless fare on buses. The RRA believes that all non-invasive improvements should be made before any irreversible and detrimental changes are made to our villages and streets.

**The following are some comments on the various chapters and appendices, which while critical, will, we hope, be helpful:**

#### Chapter 1 Strategic Context and Vision

There is a tendency in planning documents nowadays, in the public and private sectors, nationally and internationally, to always promise the best 'city in the world to live in', the best small country in the world in which to do business, the best company to work for' etc. **Our Association would settle for a well-run city.** We would welcome the timely delivery of commitments made. Some local examples are the completion of Herzog Park and the timely handing over of Marianella Park to the city. Citizens are not seeking superlatives. It is counterproductive promising superlatives when the end result will always be less than superlative. DCC should be candid about this. Targets yes. Ambition yes. Unrealistic promises and language **no**.

Chapter 1 refers, for example, to the City Council's "commitment to promoting compact growth and ensuring the consolidation of the city ...". There is no evidence to suggest that that commitment will ever be met.

### Chapter 2 Core Strategy

We support the compact growth principle but there is no reference in Chapter 2 to how compact growth would operate alongside the 15 Minute City concept. We welcome the reference in Chapter 2 to monitoring and evaluating the measures in the Plan. Monitoring reports should be robust, regular, candid and published, including about how political parties, vested interests, the courts and indeed the public are resisting the measures in the Plan. Turf wars with other state bodies should also be candidly acknowledged.

There is a great deal of text in Chapter 2 about the many pieces of legislation, strategies, frameworks and plans into which the City Development Plan must fit. That should underline the need for the Plan to be realistic in terms of what can be achieved. The Plan should refer as much to the challenges faced by the Council in meeting its housing objectives, e.g., political parties opposing projects, of which they are in theory in favour, because of the NIMBYism of their constituents, the involvement by the courts in planning issues, as well as to the opportunities. A bit of hard reality (in a short 100-page document with most of the information in appendices and without a glossy presentation/photographs) would give the Plan the kind of edge it must have to be credible. A great deal of Chapter 2 is about housing but the core strategy of a city extends beyond housing. The RRA does not get the impression that there is in reality a core strategy. There appears not to be a strategy for instance

- To limit the size of the city,
- To be specific about density (where and where not),
- To challenge vested interests,
- To question the involvement of the courts in planning issues,
- To be clear about the need for an underground in Dublin and the failure of the State to have one in place 100 years after independence, etc.

None of the above in plain terms has made it into the Plan.

### Chapters 3 and 9

#### Chapter 3 Climate Action

Climate change is going to severely impact the city (and the country), probably for several generations. The RRA agrees with DCC that climate change brings opportunities (e.g., new methods of generating power and the jobs that will arise from retro-fitting) as well as threats. We would welcome more emphasis on the opportunities whilst being candid about the threats. (See our reference above to the Poolbeg development)

We welcome the reference to mitigation and adaptation in the draft Plan. The year 2021 will probably be seen in retrospect as the year the world (governments and people) began to wake up to the reality of climate change although the RRA acknowledges that DCC has been planning for climate change for some time. The RRA would welcome a candid comment in the Plan that some national plans (which obviously have an impact on the city and its residents and businesses) contain unrealistic targets. The world's governments are trying to take shortcuts (e.g., by claiming that certain targets can be met by 2030) that they know are unrealistic. There are no shortcuts to dealing with major challenges like climate change. Planning and action will help mitigate the challenges ahead but it is too late now to avoid some of the consequences of climate change!

#### Chapter 9 Sustainable Environmental Infrastructure and Risk

Section 9.5.3 is important but very technical. More user-friendly language would be welcome. This is an area of the Plan that is very likely to impact significantly on the city in the future.



Natural flood risk mitigation measures (or, as the RRA understands it, working with nature) could turn out to be as important, if not more important, than engineering schemes. Based on what we know about the likely direction of climate change, we suspect that engineering solutions, even large and expensive ones, might stand little chance against the forces of nature.

The RRA welcomes the emphasis on surface water management. We would welcome the inclusion of a commitment in the Plan that the existing surface area of the city is as capable of absorbing heavy rainfall as it is possible to be. The RRA believes that DCC needs to visit every garden, every apartment complex, including their car parks, every office with outside grounds to check if their gardens and grounds need to be changed from concrete to gravel or grass to give them (and their neighbours) a reasonable chance of withstanding the inundation that we can expect regularly from now on. Also, it should be remembered that each open site that is built upon removes an area of absorption. Such needs to be counted as a loss to the capacity of the city's surface water management.

We note from our previous contact with DCC that the latter believes that it is up to each property owner (the RRA is thinking here, in particular, of basement properties) to judge the risk to their property from future heavy rainfall and protect it as they see fit. This is unacceptable to the RRA. Given the scale of the challenges ahead, including 100-year pluvial flood events, which might become regular and indeed occur once a year, it will not be acceptable to leave it solely up to each property owner to protect their basement properties. Our concern here is not with DCC's intentions but with how they will be achieved given the age of much of the city's drainage. This is not addressed in the Plan nor is there any reference to the usual objections to any planning initiatives that are likely to affect the capacity of DCC to address flooding issues.

It is because of the absence of information in the Plan about how the challenge of surface water management can credibly be met that the owners of properties/businesses with basements (including the owners of apartments with underground car parks) cannot be left to deal with flooding on their own. It is not realistic to expect residents and businesses to study detailed documents, appendices and maps. The RRA believes that every household, business and organization in the city (and county, in co-operation with the other local authorities in the county) should receive a booklet, during the period of the next Plan, in plain English, about the likely impact of climate change on their location over the next thirty years. It should cover everything from coastal flooding to fluvial flooding, to the impact on underground rivers, to waste water management (the absorption capacity of the city) to deliverable plans for updating the city's drainage systems (under pressure anyway even without climate change), to basement living and more. It should leave no one in any doubt about the challenges that lie ahead.

DCC's modelling should be verified by an outside agency and the results included in the Plan's appendices, which should be revised, where necessary, to take account of the outside agency's opinion. Where the modelling is not updated to take accounts of the comments of the outside agency, this should be stated in the relevant appendix and property owners in the areas affected informed.

#### Chapter 4 - Shape and Structure of the City

The Plan should provide an outline of how the city compares today to, say, twenty years ago under specific headings (density/spread, housing, how previous Plans have been successful or not, public transport, etc., etc.). Chapter 4 lists the challenges – it presses all the right buttons about balance, sustainability, urban decay, the long-term resilience of the city centre. All are just platitudes, however, in the absence of the power and the will to meet those challenges. Increased height must be confronted but must not get out of hand. The fundamental decision that has to be confronted is: Does Dublin go up or outwards? If we go up, how and where do we go up? Under what criteria and with what safeguards? That is not a bureaucratic argument but a political and cultural argument. Areas set out for high rise must be clearly defined well in

advance. Citizens must be consulted and persuaded that that is the right location and the present practice of “creeping high rise” must end if citizens are to be satisfied.

Urban design and architecture are often seriously neglected by all concerned. Streetscapes must be respected. Frequently, streets seem to be architecturally anarchic. Likewise, there is no reason why there should be endless, dull, characterless housing estates, apartment development, hotels, etc. The public areas of the city should be well designed, attractive, with appropriate signage. It is as easy to do things well as badly,

#### Chapter 5 Quality Housing and Sustainable Neighbourhoods

There are references to the Metropolitan Area Strategic Plan, Local Area Plans, Strategic Development Zones but in the absence of a concise document there is very little idea of what they mean. The RRA welcomes the reference to the 15 Minute City (page 167) as the policy of the City Council but we don't believe that the draft Plan makes clear what the 15 Minute City means for Dublin or how it will influence the development of the city. It appears to be just an idea that has not been fleshed out.

#### Chapter 8 Sustainable Movement and Transport

The RRA supports the transition away from cars and fossil fuel-based mobility **but it will take longer than the Government has suggested.** The lack of a comprehensive underground/metro system after 100 years of independence is inexplicable and makes any transport plan much more difficult to achieve. An underground system would do more than anything else to reduce the number of private cars on the city's streets. The draft Plan states that DCC will continue to engage with external agencies, including the NTA, and to assist in the delivery of sustainable transport projects that are provided at a regional or national level. What does that mean, particularly in the light of BusConnects and the ongoing failure to build an underground/metro system? The cordon counts of November 2019 (later ones cover the Covid-19 period) indicate a significant increase in active travel as well as a reduction in the use of private cars in the area enclosed by the two canals from 2006 to 2019. Currently, 71% of people travel into the city by sustainable modes (walking, cycling and public transport), according to the draft Plan. It is hard to reconcile these encouraging statistics with the number of private cars on the streets (and, it is understood, private car use has not yet returned to pre-pandemic levels).

The RRA supports higher density development along public transport routes but such proposals must be coordinated with the 15 Minute City if they are to mean anything. As stated above, the RRA supports better cycling infrastructure but for instance the junction of Rathgar Road and Lower Rathmines Road is dangerous for cyclists. If cycling infrastructure is being provided it must be done in a safe manner, if necessary, by going underground for cyclists for short stretches of roadway. Underground car parking in city villages should be developed. All apartment complexes, office accommodation, hospitals, nursing homes, etc. must have underground car parks appropriate to their size and needs but there should also be village underground car parks, for residents/businesses of Dublin's villages and/or for commuters.

#### Draft Plan, Volume 2, Appendices, Page 266

“There will be a presumption against the removal of on-street parking spaces to facilitate the provision of vehicular entrances to single dwellings in predominantly residential areas where residents are largely reliant on on-street car parking spaces or where there is a demand for public parking serving other users in the area.” It is also particularly important in Z2 areas or at protected structures that front gardens are protected from being used for car parking otherwise the idea of ACAs and protection will be compromised.

Where off-street parking is permitted rigorous rules must be enforced, e.g., gates should always be installed (and not roll-like gates that you would see at a factory). DCC should undertake a detailed survey of drive-ins with no gates and ensure that appropriate gates are installed (particularly if planning permission for the drive-in carried a requirement for gates).

### Enforcement

Current practice requires planning approval for gate widening or off-street parking (where none already exists). It is doubtful if many unauthorised such developments come to the attention of the compliance office of DCC. The system of enforcing needs to be revisited.

### Chapter 15 Development Standards

There is a reference to tree removal in this chapter (page 672). There is no reference to an overall tree policy for the city. The RRA believes that DCC needs a plan to (a) grow a great many more trees in the city (climate change, absorption of CO2, etc.) but the plan must be accompanied by a system to manage and monitor the trees, including the impact of their roots on foundations. Who would be responsible? Who would pay? The city or its residents/organizations? The RRA believes that the Plan should state what system is used by DCC and under what timescale to monitor, repair and modernize its infrastructure, not just climate change-sensitive infrastructure, but all infrastructure.

Finally, the RRA trusts that the above comments, suggestions and ideas are helpful and will assist in making the final proposition a more concise, credible and deliverable plan that will support and set the direction for our city in the coming years.

Yours faithfully,

**The present Planning Officer having reached  
“Retirement Age” will be stepping down shortly.**

**The Association is seeking a member who has some  
knowledge and interest in planning issues as a  
replacement. A time commitment of 2/3 hours a  
month is required.**

**If interested please contact the Chairperson, through  
our web site [rathgarresidentsassociation.ie](http://rathgarresidentsassociation.ie)**

## USEFUL LOCAL CONTACTS

### City Councillors and local TDs

#### Councillors

Deirdre Conroy	N/A	deirdre.conroy@dublincity.ie
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Tara Deacy	0879389904	
Anne Feeney	0872955256	anne.feeney@dublincity.ie
Mary Freehill	0868126378	marycfreehill@gmail.com

#### TDs

Chris Andrews	087 2851515	chris.andrews@oireachtas.ie
Eamon Ryan	01 618 3898	eamon.ryan@oireachtas.ie
Jim O Callaghan	01 618 3134/01 475 8943	jim.ocallaghan@oireachtas.ie

<b>Local Gardai:</b>	Rathmines	Tel: 01 6666700
	Terenure	Tel: 01 6666400

**Dublin City Council:** problems with litter, potholes, graffiti, abandoned vehicles etc  
Go to Dublin City Council website and key in service request and follow instructions  
or Tel: (01) 222 2222 or Email [customerservices@dublincity.ie](mailto:customerservices@dublincity.ie)

**Fixmystreet.ie** – a great website to report and get action on litter, pavement and road condition issues graffiti, etc.

#### Keep up to date:

**The Association's website:** [rathgarresidentsassociation.ie](http://rathgarresidentsassociation.ie)

**Facebook:** <https://m.facebook.com/RathgarResidentsAssociation/>

**Contact the Association:** [info@rathgarresidentsassociation.ie](mailto:info@rathgarresidentsassociation.ie)

**Twitter:** @RathgarResident; <https://twitter.com/RathgarResident>