A REVIEW OF THE DISCUSSION DOCUMENT

MAXIMISING THE CITY'S POTENTIAL: A STRATEGY FOR INTENSIFICATION AND HEIGHT

&

RECOMMENDATIONS FOR WAY FORWARD

SEPTEMBER 2008

A Review Of The Discussion Document Maximising The City's Potential & Recommendations For Way Forward

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Appendix

MAXIMISING THE CITY POTENTIAL: A HEIGHT STRATEGY FOR DUBLIN: DRAFT

STRUCTURE OF PAPER

Section 1 contains a summary of the main points raised from the overall consultation process including written submissions, the Croke Park Conference and the 5 Area Meetings.

Section 2 sets out the need to separate height and density in order to provide clear guidance.

Section 2.2 (Density) outlines the reason for density in the city and how it should be integrated with policies for a sustainable, well connected city of quality neighbourhoods (the 6 themes). Example of schemes which have contributed to the city in this way are shown.

Section 2.3 (Height) outlines the main reasons for height, and discusses briefly the international experience and the environmental challenges of such buildings.

Section 3 deals with the DEGW report (A Strategy for Building Height 2000). Although the Strategy emphasised the low rise character of the bowl of the inner city, with height at limited locations it predates the Transport 21 programme and did not give guidance on height in areas outside of these limited locations.

Section 4 sets out the proposed revised strategy on height which is to combine a criteria based approach (overshadowing etc) with Areas of the city where height would / would not be appropriate based on a layered analysis e.g. public transport hubs, Conservation Areas, topography, cultural clusters and historic height.

Section 5 explains what the application of this approach means in practice. Specifically height (now defined in two categories 8-16 storeys and 16 storeys plus) is only acceptable in limited locations across the city i.e. parts of the Docklands and Heuston with a few mid-rises at Grangegorman / Phibsborough. In the outer suburbs height is considered appropriate again at limited locations such as Naas Road, echoing the recent limited application of height in new suburbs such as Pelletstown and the North Fringe.

Section 6 clarifies status of the revised strategy; it is recommended that it should form part of the Development Plan and any other appropriate statutory or regulatory framework.

1.0 MAXIMINSING THE CITY'S POTENTIAL FEEDBACK FROM PUBLIC CONSULTATION

1.1 Introduction

The draft discussion document was released for public consultation following a meeting of the Economic Development, Planning and European Affairs SPC in November 2007, and the City Council in December 2007. The consultation period lasted 3 months from January to April 2008. 133 written submissions were received, a report of which has already been circulated to the SPC.

The written submissions represented a wide spectrum of interests viz:

Category Type	***Percentage of Submissions***
Sectoral Groups Organisations etc	17%
Businesses / Developers	37%
Residents Groups	11%
Political Groups / Elected Members	5%
Individual Submissions	35%

The consultation process included a conference at Croke Park in April 2008, attended by 330 people. At the conference workshops concern was expressed that not all opinions were being heard. To address this concern, 5 additional public meetings / workshop were held (one in each of the 5 administrative area of the city) during May / June 2008, a written synopsis of which was also circulated to the SPC earlier.

1.2 Summary of Key Issues Raised in the Overall Consultation Process

The overall consultation process resulted in a wide spectrum of opinions on the Discussion Document, ranging from generally positive (47%) to very critical (22%) of the written submissions. However the Area public meetings / workshops were attended largely by Residents Groups which were generally negative regarding the document.

The Key Issues raised from the overall consultation process may be conveniently grouped viz:

1. Status of the Document / Strategy
2. Density versus urban sprawl
3. City Character / Heritage
4. Height (Why, Where & How High?)
5. Economy / Tourism
6. Residential Amenity
7. Transport and Movement
8. Environmental Sustainability.

1. ***Status and Content of Document / Strategy***

- Much concern about the lack of clarity as to the statutory basis of the Document; and where it would fit into the hierarchy of Strategic and Local Plans. Would the document be included in the next Development Plan, or be a Variation of the current plan?

- Over reliance on Local Area Plans and Framework Development Plans to deliver what should be a citywide strategy; too much delegation in draft document e.g. “to be determined at local framework level. “

- The document should be accompanied by a Strategic Environmental Assessment.

- There should be greater evidence of analysis and international comparison in the document.

- The 6 Themes Approach needs to be developed. Greater clarity needed as to level of input required from developers / stakeholders.

2. ***Density V Urban Sprawl***

- Intensification can be good for the city economy, e.g. the benefits of clustering and by creating a competitive environment which could reduce the cost of living.

- The document is confusing about height and density and a clear justification is necessary for height other than to achieve density.

- Intensification supports complementary mixed use and the Transport 21 programme for Luas, Metro and the Interconnector and a walkable city.

- There is little evidence that recent density increases is reducing urban sprawl

- Higher densities must not compromise the qualities of the city, especially good recreational space.

3. ***Character / Heritage***

- Dublin's unique character, defined by the Liffey, and its Georgian Squares and streetscapes of human scale must be given protection from inappropriate density or height.

- Key views and prospects should be included in the strategy , but this should not be seen as a negative tool, in that it could be used to ensure sensitive orientation of building to frame views.

- A 3D model of the inner city should be produced to assess impacts on the city's historic character.

- Prevailing street character should be retained. Some say that European 6 storey model achieves both density and streets which are not oppressive.

4. ***Height: Why, Where, How High***

- The provision for exceptions and the proposed assessment criteria is much too loose and open to multiple interpretation

- The strategy as written will have a negative impact on Dublin's character, and its historic areas, and may result in increased dereliction. There should be greater protection for the historic case.

- The height levels are too high, unrelated to the European context

- A small number of tall buildings could be allowed; but only where allowed in Local Plan, with emphasis on design and location

- No confidence that Dublin can deliver iconic tall buildings of quality: existing legacy is poor e.g. Hawkins House.

- Higher buildings must be suitable for Irish climate- wet, windy and relatively high latitude

- Are high buildings, environmentally sustainable and how will they affect climate change?

- The benefits of high buildings for citizens must be clarified e.g. more amenities/ civic space etc.

- The height strategy is not strategic, but is a response to developer pressure.

5. The Economy / Tourism

- General feedback is that quality intensification supports Dublin's economy and that clear policy on Density and Height will give more certainty to investors.

- It is largely the city's heritage, and character which attracts tourists; but tourists also want good quality hotels close to the city centre.

- Concern about loss of traditional manufacturing/ local employment from the Z6/ Z7 zoned lands.

7. Residential Amenity/ Community Facilities/ Quality of Life

- Recurring issue is how to achieve vibrant neighbourhoods in/ around tall buildings. Very tall buildings equated to vertical cul-de-sacs.

- How can the 6 themes be translated into the provision of a range of infrastructure and facilities to a quality and standard that would support quality density in local neighbourhoods and meet their needs?

- A model for the financing/providing community infrastructure in a Developer led system should be set-up.

- A more meaningful community consultation process is needed that achieves great community buy-in.

7 Transport and Movement

- General support for Intensification and mixed use close to all rail/ Luas stations and on QBCs which are delivering high passenger numbers. Extent of catchment areas to be clarified in document (1 km in Sustainable Residential Density Guidelines)

- New Interconnector and Port Tunnel are strategic Infrastructure and should be highlighted

8. Environmental Sustainability

- Policy on density is too late to prevent urban sprawl in Leinster, given the number of Local Authorities involved.

- There should be a comparison between the embodied and on-going energy costs in relation to increased densities/ tall buildings compared to the carbon footprint associated with car-based community.

1.4 Conclusion of Findings on Consultation

The overall consultation process points to *3 Crucial Areas of Concern* which need to be addressed:

- The Need to Separate Density and Height
- The Need to clarify the Status of the Strategy in relation to the City Development Plan, Local Plans and the Development Management Process.
- The need to review the concept of “Exceptional Circumstances”

2.0 SEPARATION OF HEIGHT & DENSITY

2.1 Separation of Height & Density

There is a great level of confusion in the public debate on density and height. In order to provide clarity it is necessary to explain each separately.

2.2 Density

2.2.1 Reasons for Density

The central objective of the current City Development Plan is to consolidate the city, in other words to create a more dense compact city and in so doing ensure the City Council plays its part in tackling the long standing sprawl of unsustainable low density across the province. There are many reasons for higher densities, which apply at both a strategic and a local level.

- Costly public transport infrastructure becomes more viable
- There is less reliance on the car and therefore less energy and fossil fuels being used
- In a compact city people spend less time commuting, walk and cycle more and are therefore more healthy
- The provision of a wide range of services including health, education, sports, library requires sustainable densities to be cost effective. The more costly the facility is, the less viable it becomes as densities decrease e.g. a theatre or swimming pool.

It may be surprising to us, but there is seldom a debate about density in European Cities and towns, though there is often one about height. In Europe density is a given, there is a long established tradition of living in a dense urban environment and an expectation of certain benefits and services from this experience. Design is acknowledged to be centrally important in managing change to ensure that the quality of liveability is protected and enhanced. The current development plan has a series of criteria based standards which deliver quality in a variety of forms, such as contextual streetscapes, stepped heights in transitional zones, open space standards and quality residential units under the Sustainable Apartment Guidelines. These mechanisms have delivered quality to date largely within the 3-8 storey format. It must be stressed that there is adequate policy in the current Development Plan to safeguard residential amenity and that the proposed policy in this report sets out additional context for height.

2.2.2 Density & The Six-Themes

In the absence of a strong design philosophy, the delivery of higher density can be challenging. The objective to achieve densities must not stand-alone. It must be supported by strong urban principles that have as a starting point an acceptance of good urban places and a commitment to high quality design.

The application of the 6 Themes by the City Council is a way of bringing a user-friendly structure to this very complex task. A criteria based policy, whereby applications must deliver sustainable development focused on quality of life for people in a well-connected city with good neighbourhoods, would ensure quality at higher-density levels.

2.2.3 Good Examples

95% of the quantum and accommodation needs of the city can be delivered on the basis of a density at 8 storeys or under. A clear set of urban principles can inform the design process, and ensure that a graded height approach up to 8 storeys will acknowledge existing character and variety of context. At this stage many good examples of this more dense urban environment can be found across the city. Temple Bar West, Mayor Sq environs, the built fabric around Grand Canal Dock, St. Anne's Milltown, Ballymun and Pelletstown are some of the locations where a good design strategy has driven the density objective (Refer to Photographs in Appendix).

2.3 Height

2.3.1 Reasons for Height

The reasons for height are much fewer than those for density and focus mainly on identity / place-making and economics. In terms of economics, requirements focus around creating intense activity in tightly defined clusters, creating significant size of floor plate and accommodating H.Q. type activity. Identity reasons focus on the role of taller structures in creating visibility and profile and can range from local landmark buildings of modest scale to city skylines that become part of a city brand internationally.

2.3.2 International Dimension

The Planning & Economic Development Department has reviewed a number of European cities (London, Liverpool, Copenhagen, Amsterdam, Rotterdam, Cologne, Frankfurt, Munich, Zurich and Vienna) and assessed their policy approach to the issue of height. The cities were selected on the criteria of size, economic status, city structure and character.

The different approaches of the various cities all indicate that the existing urban character and structure of each city must be given careful consideration as these two factors appear to exert a strong influence on how a city moves towards a height strategy. There are two different ways that cities generally approach high-rise:

(1) Some European cities, for instance Rotterdam and Frankfurt, have a tradition of high-rise development going back several decades. These cities tend to encourage high-rise and therefore have a policy which promotes high-rise development.

(2) Most European cities recognise that high-rise development is a means of creating a city that is modern and creative in its appearance. However, they also acknowledge that the historical cityscape needs to be protected..

When comparing polices to manage building height in European cities, it becomes clear there are three different approaches: Specification of Maximum Building Heights; Area-Based Guidance & Criteria Based Assessment. In Dublin to date the criteria based approach predominates.

1. *Maximum Building Height* (e.g. Berlin 22m) generally, but allowing for exceptional circumstances.
2. *Area-Based Guidance*: with generally appropriate areas shown on maps.
3. *Criteria Based Assessment*: for each proposal, e.g. views, residential amenity etc.

The definition of a high building varies from city to city e.g. in Copenhagen high buildings are 8-12 storeys (24m-40m), with high-rise being taller than 13 storeys. In Amsterdam high-rise is defined as taller than 30m, or twice the average of the surrounding buildings.

2.3.3 Environmental Challenges of Tall Buildings

International research undertaken in the field of sustainable tall buildings concludes that integrating environmental considerations into building design is a vital step in achieving sustainable development in our cities. The construction of tall buildings will have, like any building process, environmental impacts associated with natural resource extraction for materials and the manufacturing of building materials. Taller buildings are also dependent on energy resources such as lifts, which utilise 5%-10% of overall electrical load and lighting which can use 10%-25%. There is also the burden of delivering water at height and handling the removal of waste. Wind funnelling at ground level can prove to be a significant problem with many tall buildings and indoor micro-climatic conditions can create overheating on the southern elevations.

Taller buildings can facilitate sustainable development by concentrating higher densities of people, activities and a mix of land uses with an accompanying energy efficient design. Combined Heat to Power stations (CHP) is one example where the appropriate level of development can make such a system viable and cost effective. The overall supply of energy and the means of creating it is a national policy issue. Ultimately, if higher densities derive their energy from a national grid system that relies less on fossil fuels and more on renewable energy resources, a more sustainable environment will be created.

3.0 DEGW 2000

3.1 DEGW, 2000

In 2000 Dublin City Council commissioned a report on intensification of land use - Managing Intensification and Change (DEGW, 2000). The purpose of the study was to provide a co-ordinated response to the rapid growth and change that Dublin was facing. The strategy acknowledged the intrinsic quality of Dublin as a low to medium rise city with a presumption that it should remain so while simultaneously highlighting opportunities for the consolidation of the city core and intensification of use.

DEWG identified distinct character areas within the historic bowl of the inner city and also zones for change. It recommended that taller buildings should be located mainly in identified zones for large-scale change, such as the Docklands, and also concentrated in Clusters at the main railway stations of Heuston, Connolly, Tara and Pearse. DEGW was largely silent on the suburbs and did not set out a strategy for the outer city, save for a statement that height should be addressed through local or framework plans. Also, DEGW pre-dated the proposals of Transport 21, which when implemented will significantly change the landscape of the city in terms of accessibility.

DEGW identified 4 Height Thresholds for Buildings as shown below. These DEGW height thresholds were set out in the discussion document Maximising the City's Potential, however, these heights have not proved useful in the Dublin Context.

- Low rise; up to 15m (4 storey)
- Mid rise; 15 - 50 (up to 12-15 storeys)
- High rise; 50 – 150m
- Super high rise; above 150m

3.2 DEGW, 2000 & Development Plan

The policy for building Height in the current City Development Plan is largely based on the DEGW Report. The Development Plan Policy states that any proposed high buildings must be sensitive to the historic city centre, the River Liffey and Quays, Trinity College, Dublin Castle, Georgian Squares and canals whilst also allowing high buildings in certain locations to promote investment vitality and identity. A number of criteria are set out for the assessment of high buildings, including the need for good urban design and positive contribution to the city's skyline; the need to respect important views and prospects; and the need to minimise overshadowing and micro-climatic downdrafts etc..

However, this criteria based approach appears to have resulted in a lack of clarity for both developers and the public. Considerable resources have been taken up over the last 5 years dealing with ad-hoc pressure for tall buildings in various parts of the city.

4.0 REVISED STRATEGY FOR HEIGHT

4.1 The Revised Approach

The revised strategy for height combines a criteria based approach (overshadowing, micro-climatic, residential amenity, etc) with areas of the city where height would / would not be appropriate based on a layered analysis, by way of city-wide mapping of the following determinant factors:

1. Economic & Cultural Engines
2. Major Public Transport Interchanges;
3. The Georgian & Residential Conservation Areas
4. Key Views & Prospects for Protection;
5. Natural Topography;
6. Historical Use of Height
7. Strategic Areas in the Outer Suburbs

The layered analysis exercise is illustrated in a series of maps as shown in the Appendix.

The vision for the city under the above approach emerges, and is as set out in the section below, with height falling primarily into two category types: 8-16 storeys and 16 storeys plus.

4.2 Height in the Dublin Context

It is likely that the majority of high buildings allowed in the designated areas will be within the mid-rise category (see orange areas map 5). This is especially the case in relation to the suburbs. Locations within the city centre context where higher buildings would be justified are also identified (see purple areas map 5).. On this basis, it is suggested that height definitions as shown below may be more appropriate in the Dublin context. It is necessary to emphasise that height above 8 storeys will only be appropriate in these designated areas i.e. orange and purple areas on map 5.

- Mid rise; 15 - 60m (up to 15 storeys office)
- Taller buildings; 60 - 150m (15 – 37 storey office)

5.0 THE VISION FOR THE CITY – UNDER THE NEW STRATEGY

5.1 Historic Inner City

Dublin City Council remains committed to the protection of the special character of the city's historic core located within the 'bowl' of the inner city. In this respect, it will be the policy of the Dublin City Council that development proposals for higher buildings within this historic core shall be determined by local context i.e. the established urban form and building height, subject to a maximum height in any case.

The historic inner city with the special character of the streets, squares and key views, will be protected with height acceptable only at the main transport stations on the edge of the historical area, such as Heuston, Tara, and Connolly.

It would also result in height at a limited number of locations along the natural ridge of the inner city bowl to reflect the digital knowledge economy at Digital Hub and also the new knowledge centre at the DIT Campus at Grangegorman, as well as the National Children's Hospital at Phibsborough.

5.2 Docklands / Heuston

The Docklands as the 'new city' where the down river location, larger block structure and emerging public transport infrastructure combines to create new identity, with fewer constraints in terms of context and historical fabric. The Docklands Area, by virtue of its location downriver and physical separation from the historic inner city, has by far the greatest capacity for change and the greatest potential to accommodate height.

The Heuston Area, as the western gateway to the inner city and a major transport hub also merits height, albeit to a lesser extent given contextual constraints. It is envisaged that new buildings to the east of the proposed new civic space should continue to reflect the scale and grain of the quays and should avoid blocking views of the city skyline on approach to the city from Phoenix Park.

5.3 The New Suburbs

The new suburbs represent areas of significant development potential where new residential neighbourhoods are emerging along sustainable transport corridors, such as North Fringe and Pelletstown. Height, by way of a limited number of mid-rise buildings has already been used to confer a new identity in these areas, at the rail station in North Fringe and similarly at the Town Centre in Pelletstown. This approach of a very specific and limited use of height to create a focal point could be continued in other developing areas: Naas Road, Park West and Cherry Orchard.

6.0 STATUS OF THE STRATEGY

6.1 Instigate Variation Process

It is recommended that the revised proposals be incorporated as development plan policy. Pending a positive response and subsequent endorsement by the full council, it would be the intention to progress the revised strategy as a draft variation of the development plan. A clear outline or 'road map' would accompany the revised strategy to ensure transparency and clarity in respect of the overall process, timeframe and status.

Amendments or changes to the adopted policy will only be affected by the elected members having regard to the appropriate statutory or regulatory framework.

Photograph No. 1

Pelletstown – Sustainable Density Levels Delivering Quality & Neighbourhood Centre Uses

Photograph No. 2

Pelletstown – The use of a local landmark building to create identity and place-making.

Photograph No. 3

North Fringe: Modest Building Heights Delivering Sustainable Densities of circa 130 Units/Ha.

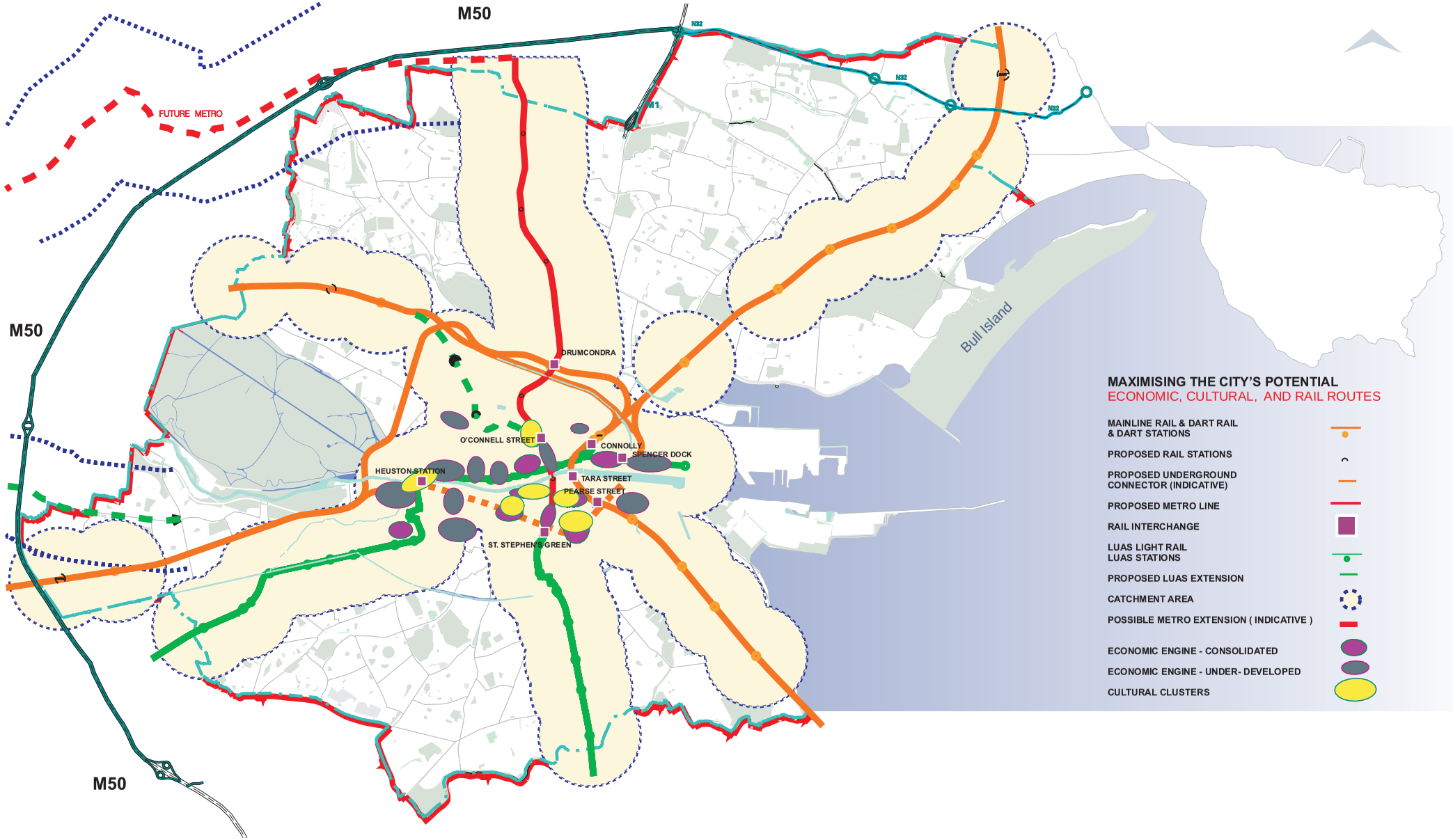
Photograph No. 4

Grand Canal Dock: Higher Building Heights with Civic Space in the Docklands

Photograph No. 5

Grand Canal Dock – Altro Vetro Building as a Significantly Taller Landmark Structure

MAP 1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N32
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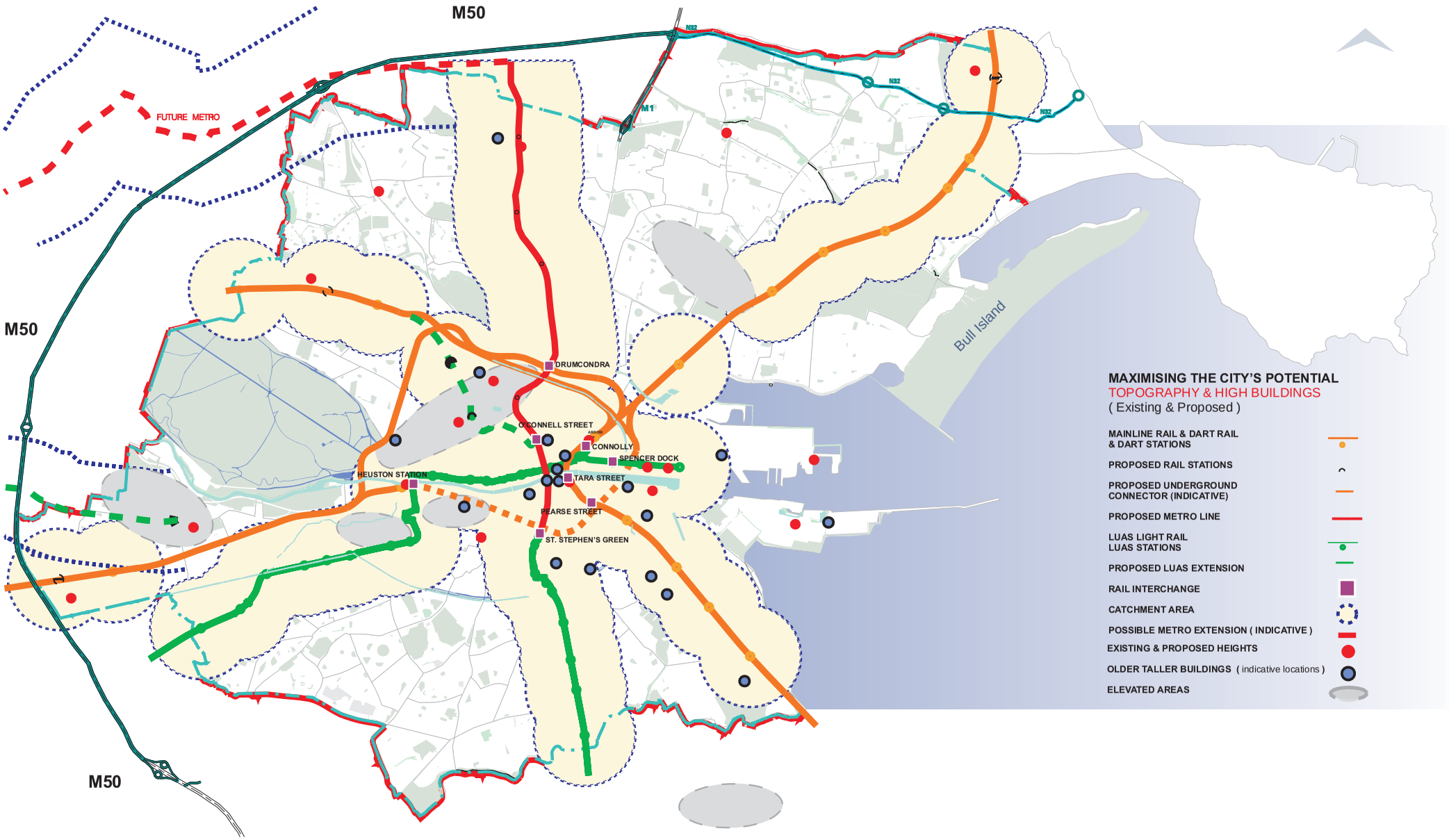
DRUMCONDRA
O'CONNELL STREET
CONNOLLY
SPENCER DOCK
HEUSTON STATION
TARA STREET
PEARSE STREET
ST. STEPHEN'S GREEN
Bull Island
MAXIMISING THE CITY'S POTENTIAL
ECONOMIC, CULTURAL, AND RAIL ROUTES
MAINLINE RAIL & DART RAIL & DART STATIONS
PROPOSED RAIL STATIONS
PROPOSED UNDERGROUND CONNECTOR (INDICATIVE)
PROPOSED METRO LINE
RAIL INTERCHANGE
LUAS LIGHT RAIL LUAS STATIONS
PROPOSED LUAS EXTENSION
CATCHMENT AREA
POSSIBLE METRO EXTENSION (INDICATIVE)
ECONOMIC ENGINE - CONSOLIDATED
ECONOMIC ENGINE - UNDER- DEVELOPED
CULTURAL CLUSTERS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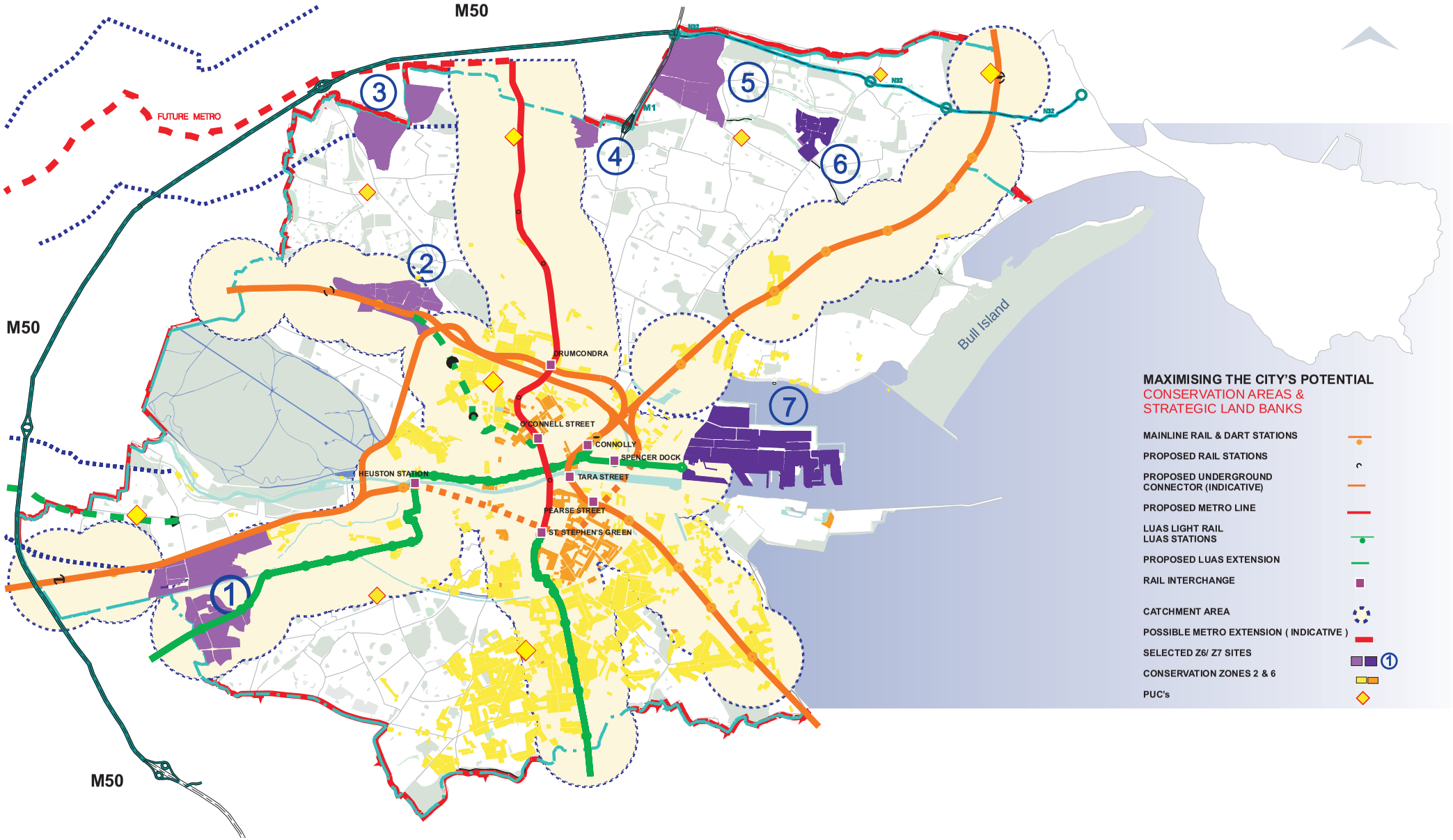
CONNOLLY
SPENCER DOCK
HEUSTON STATION
TARA STREET
PEARSE STREET
ST. STEPHEN'S GREEN
MAXIMISING THE CITY'S POTENTIAL
TOPOGRAPHY & HIGH BUILDINGS
(Existing & Proposed)
MAINLINE RAIL & DART RAIL & DART STATIONS
PROPOSED RAIL STATIONS
PROPOSED UNDERGROUND CONNECTOR (INDICATIVE)
PROPOSED METRO LINE
LUAS LIGHT RAIL LUAS STATIONS
PROPOSED LUAS EXTENSION
RAIL INTERCHANGE
CATCHMENT AREA
POSSIBLE METRO EXTENSION (INDICATIVE)
EXISTING & PROPOSED HEIGHTS
OLDER TALLER BUILDINGS (indicative locations)
ELEVATED AREAS

MAP 2

MAP 3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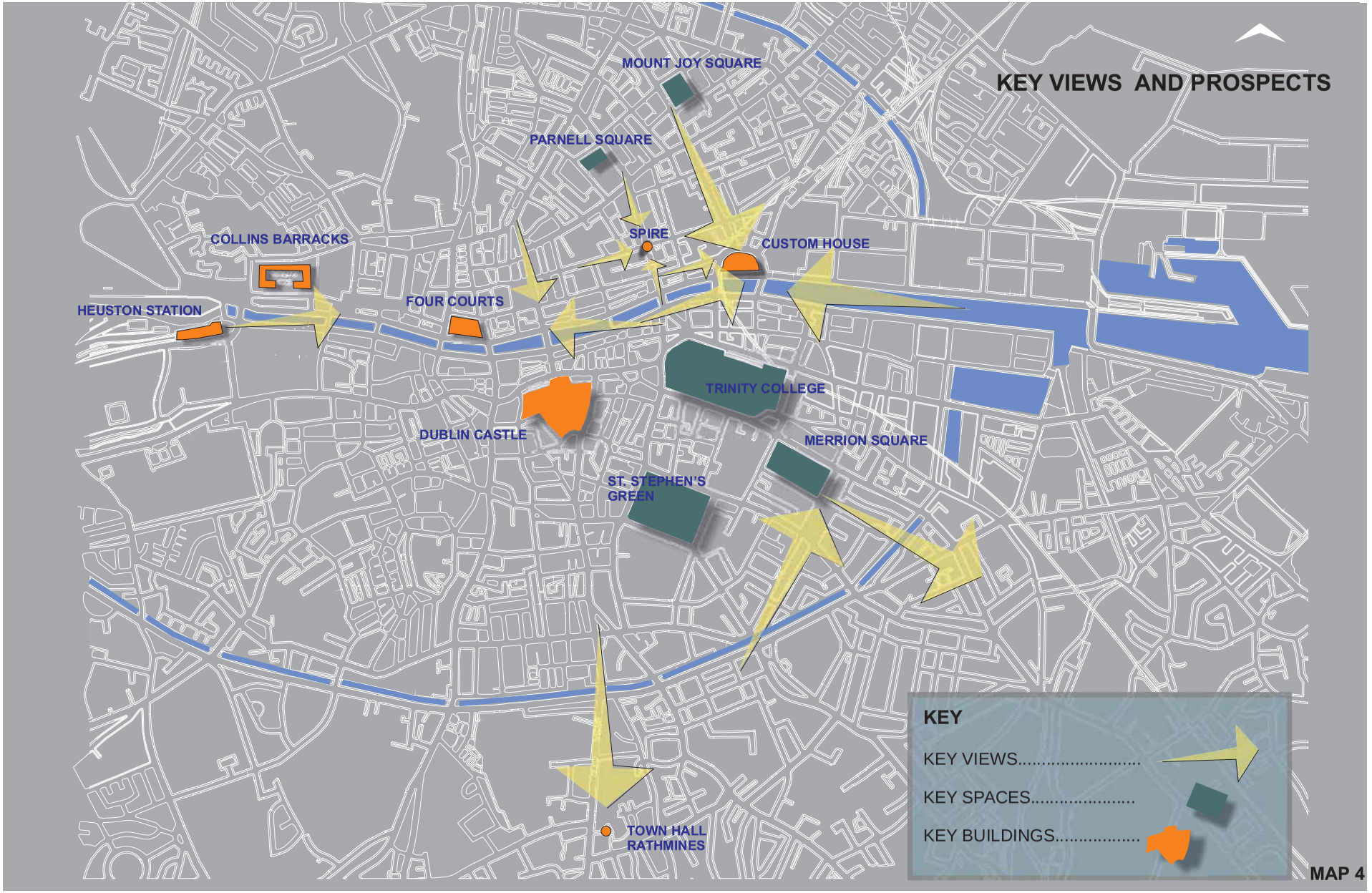
CONSERVATION AREAS &
STRATEGIC LAND BANKS
MAINLINE RAIL & DART STATIONS
PROPOSED RAIL STATIONS
PROPOSED UNDERGROUND
CONNECTOR (INDICATIVE)
PROPOSED METRO LINE
LUAS LIGHT RAIL
LUAS STATIONS
PROPOSED LUAS EXTENSION
RAIL INTERCHANGE
CATCHMENT AREA
POSSIBLE METRO EXTENSION (INDICATIVE)
SELECTED Z6/ Z7 SITES
CONSERVATION ZONES 2 & 6
PUC's


KEY VIEWS AND PROSPECTS
MOUNT JOY SQUARE
PARNELL SQUARE
SPIRE
CUSTOM HOUSE
COLLINS BARRACKS
HEUSTON STATION
FOUR COURTS
TRINITY COLLEGE
DUBLIN CASTLE
MERRION SQUARE
ST. STEPHEN'S GREEN
TOWN HALL RATHMINES
KEY
KEY VIEWS.....
KEY SPACES.....
KEY BUILDINGS.....
MAP 4

MAP 5

AREAS IDENTIFIED AS APPROPRIATE FOR HIGH BUILDINGS / High Building Clusters

1. Eastern Cluster
2. Connolly
3. Phibsborough
4. Grangegorman
5. Western Cluster
6. Digital Hub / Grand Canal Basin
7. Georges Quay
8. North Fringe
9. Clonshaugh Industrial Estate Z6 Lands
10. Ballymun
11. Pelletstown
12. Dublin Industrial Estate Z6 Lands
13. Ballyfermot (pending LUAS)
14. Parkwest / Cherryorchard
15. Naas Road Z6 Lands

Height Types

8 - 16 storey.....

16 storey plus

Main Public Transport Routes (Existing & Proposed)

- Rail
- LUAS
- Q.B.C./main radial
- Promenade & cycle way proposal