



## **Response to Draft Dublin City Development Plan 2011-2017**

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### **Preface**

This response to the draft Dublin City Development Plan 2011-2017 builds upon Dublin Chamber's initial submission of March 2009.

### **Dublin Chamber Key Recommendations:**

- The core and over-arching strategy of the next Development Plan must be business focused and address what Dublin City Council intends to do to tackle the well-documented competitiveness deficits of the Dublin City Region, and specifically to improve the business environment so that existing jobs are supported and employment generated.
- The Development Plan must positively shape our city far beyond 2017 and be seamlessly integrated with the plans of the three County Councils and the Dublin Docklands Development Agency.
- The Development Plan must be founded on the radically changed city environment that will emerge when Metro North and the DART Underground are complete.
- The Development Plan must be creative and practical in its response to present economic challenges, by simultaneously fostering future higher density commercial development in the Central Business District whilst accommodating the refurbishment of existing stock to respond to the needs of today.
- The Development Plan must give greater consideration to the role of Dublin Port in the infrastructure and shape of the City Region, and more information on flood relief measures to protect the IFSC.
- The Development Plan must address the issue of sustainability and the environment more comprehensively, by outlining actions that can be taken to 2030 and beyond to reduce carbon emissions, improve energy efficiency and the security of our energy supply.

## **1. Building a competitive Dublin City Region beyond 2017**

### **1.1 Long term planning is essential**

The business community in the Dublin City Region has experienced major upheaval, and faced many challenges to the survival of their firms, during the economic turmoil of the past eighteen months. A reflective period is now required for the built environment to settle down following the building boom. Accordingly, it is imperative that the Dublin City Development Plan 2011-2017 looks beyond its suggested term to 2017, and creatively and proactively responds to the new economic environment in which the Dublin City Region finds itself so that competitiveness can be restored and developed. The statement in the draft Plan that “the current economic downturn is an opportunity to create a vision for the city that will not only facilitate recovery but will seek to ensure that this recovery takes place in a coherent, sustainable manner for the benefit of the city, the region and the country” is positive but vague and unsupported by practical action plans. Dublin Chamber strongly believes that the Plan must outline long term actions that positively shape our city out to 2030 and beyond.

### **1.2 Meaningful integrated regional planning is essential**

Dublin Chamber welcomes the recognition given in the draft Development Plan that there is a need to develop “Dublin City as the heart of the Dublin region and the engine of the Irish economy with a network of thriving spatial and sectoral clusters, a focus for creative talent and creative assets”. However, this will only happen if the issues which negatively impact on Dublin’s competitiveness - including a lack of an integrated transport network; mismatched land use and planning; a lack of appropriate height and density in key commercial areas etc. - are tackled at a strategic regional level.

Dublin Chamber finds it incredulous that the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, whose function is to set the basis for the Development Plan for the region, are out for consultation simultaneously with the draft City Development Plan. Not only should the City Plan for the next seven years be drafted in the context of finalised Regional Planning Guidelines, but the draft City Plan is also not integrated with the plans of the three other Dublin local authorities (in particular across the themes selected and the timing of consultation), and arguably it is not knitted into the Master Plan of the Dublin Docklands Development Authority or with the legislation governing the National Transportation Authority.

Overall, the Dublin City Region needs an integrated, coordinated and coherent Development Plan, not four distinct, partially coordinated and often contradictory plans that also compete with an array of other legislation and policy recommendations. The vast array of existing plans must be consolidated so that engagement with stakeholders across the City Region is meaningful, and development occurs in a connected and timely manner.

Agreed actions are needed across the four Dublin local authorities to support jobs and local entrepreneurs with approved budgets to deliver targeted measures.

#### **1.2.1 Directly elected Mayor for Dublin**

Dublin Chamber recognises the potential positive benefits that the introduction of a directly elected Mayor for Dublin will have on developing and overseeing policy for the Dublin City Region in land-use planning, housing, waste management, and water services, and the strong role this office will also have in transport and traffic management. The Development Plan must give full recognition to the detail of the published legislation, *Local Government (Dublin Mayor and Regional Authority) Bill 2010*.

Specifically, the Plan should expand, in far more detail, the City Council’s plan for a single waste management plan for the City Region and the delivery of a City Region water services strategy.

### **1.3 Recognising the impact of DART Underground & Metro North on the shape of the City Region is essential**

For the Dublin City Region to thrive and be competitive, both the DART Underground and Metro North projects must be delivered. In keeping with our belief that long term planning is essential, Dublin Chamber does not believe that the draft Plan goes far enough in recognising the new environment post delivery of these projects in the statement, "the strategy makes optimum use of existing and proposed transport infrastructure such as Metro North, Luas and the Dart Underground". Dublin Chamber believes the Development Plan must be founded on the radically changed city environment that will emerge when Metro North and the DART Underground are complete, otherwise it will be an ineffectual document that does not appropriately reflect the shape of the City Region.

Dublin Chamber calls for the Development Plan to include specific details about how the city is going to cope with the significant disruption that will inevitably arise when these major projects get underway. The statement in the draft that "It is an objective of Dublin City Council: SIO3 To support and facilitate the implementation of 'Transport 21' public transport infrastructure and assist in facilitating the construction and associated mitigation of major public transport infrastructure projects where necessary" is not comprehensive enough. As many proposed investments will not be able to proceed if access to the city centre is severely restricted over the period to 2017, the Plan should therefore set out the City Council's detailed proposals for pedestrian access, traffic calming, parking and controlling the flow of construction traffic. Where relevant, Dublin City Council should also provide relevant details from the three other local authorities as to how they will assist traffic management over the course of the construction of Metro North and DART Underground, for example, in relation to the provision of Park and Ride services.

## **2. Promote and support business activity in Dublin City**

Dublin Chamber believes that the six themes upon which the draft Development Plan is based are not sufficiently centered on supporting growth and employment. Ultimately, the primary focus of the Development Plan must be on supporting business activity so that existing jobs are supported and employment generated. If the City Council fails to amend the focus of the Plan then the rates base, which funds the bulk of Council expenditure, will contract.

### **2.1 Height and Density**

The Development Plan must be creative and practical in its response to present economic challenges, by accommodating the refurbishment of existing stock to respond to the needs of today whilst simultaneously fostering future higher density commercial development in the Central Business District.

When the DART Underground and Metro North are delivered, the landscape of Dublin city will be entirely different. It is of the utmost importance that the Plan maximises the potential of these projects by facilitating increased height and promoting density along key transport corridors, including LUAS lines, and in the Central Business District.

As the hub of the Dublin City Region (which in itself is the engine of growth for the national economy), it is essential that the density of commercial development in the city centre is increased. The agglomeration impact of high density, in terms of sustainability and productivity benefits, is immense:

- ❖ Less urban sprawl means less need to use greenfield sites;
- ❖ Better use of public transport;
- ❖ Increased specialisation in businesses resulting in improved efficiency and expertise;
- ❖ Knowledge spillover between firms in the same sector, and across sectors, leading to increased innovation;
- ❖ Increased competition which can spur on innovation; and
- ❖ Increased labour pool with a wide range of skills and expertise.

In practical terms, a doubling of employment density within a given area can lead to a 12.5% increase in output per worker, or 22% for those in the services sector.<sup>1</sup> So while it is appreciated that height does not equal density, Dublin Chamber believes that increased height in future developments in the Central Business District should be accommodated.

Furthermore, Dublin Chamber believes that more understanding of, and greater focus on, what makes each area in Dublin city attractive is needed in the Plan if the City Council is to be successful in their vision to develop "Dublin City as the heart of the Dublin region".

For example, office business activity drives the economy of the 'Dublin 2' area - businesses are attracted to locate there because of the agglomeration effects outlined above; and retail, leisure and hospitality services thrive because the customer base is there to utilise their services.

Therefore, the Plan should focus on strengthening the development of office space in core commercial areas (such as Dublin 2) in the city. This will require a two-pronged approach:

- ❖ Move away from too many zonings that all strive to respond to all development needs. By designating certain core business districts as 'office commercial', this will encourage a move away from the current practice of every scheme proposing mixed-use development.
- ❖ Give recognition to the fact that the development needs of businesses have changed and are not the same as those during the boom years, by facilitating and supporting the redevelopment of obsolescent and older buildings in the city centre. This will require the City Council to allow for increasing the density of existing stock by efficiently adding height (and floor space) to a building design, without adding to the current footprint of the city. It is critical that we redevelop and do not let vacant building stock in the city continue the cycle into disrepair over the medium to long term if we are to remain an attractive location domestically and internationally.

Finally, in relation to business parks and industrial estates in the City Region, the Plan is almost silent on the need to upgrade and expand these. The next draft of the Plan must include an audit of all these facilities to ensure that the City Region has the right type of capacity ahead of demand.

## **2.2 Retail Development**

Dublin Chamber believes that the "strengthening the city as the national retail destination" element of strand two of the Plan's core strategy is not in keeping with the stated priority to "restrict through traffic and calm traffic generally within the city centre and to give increased levels of priority for pedestrians, cyclists and public transport", nor with the traffic policies recently introduced by the City Council that prioritise the needs of cyclists, pedestrians and taxi's above the private vehicle users and which restrict through traffic within the city centre.

Car based shoppers, diners, tourists, concert and theatre goers, are a critical component of the city's ecology and economy. Failing to acknowledge the role that private vehicles play in the draft Plan will be detrimental in the success of Dublin City remaining "the prime retail destination in the region and the state", and could lead to Dublin becoming a donut city with an empty city centre.

Dublin Chamber calls on the City Council to recognise that shopping is a discretionary activity, and any perception of inconvenience caused by disrupted travel patterns due to restrictions placed on private vehicles will simply result in individuals selecting alternative locations to shop rather than promote a move to public transport. The consequences for the city's rate base should therefore be at the front of any proposals which will make life even more difficult for the city's retailers.

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<sup>1</sup> "The economic impact of high density development and tall buildings in central business districts", a report for the British Property Federation by Colin Buchanan and Partners, September 2008.

If the Plan is to help realise the current commitment to 'keep the city open for business', then the aims and priorities in the draft must be amended to include ones that are good for commuters, bus access, cyclists, pedestrians, business traffic and private vehicle users alike.

Consequently, Dublin Chamber does not support the policy of Dublin City Council "to ensure adequate but not excessive parking provision for short term shopping, business and leisure use; and to control the supply and price of all parking in the city in order to achieve sustainable transportation policy objectives'.

Furthermore, if the stated objective of the City Council to empower the Retail Core to develop and reinforce its position as the premier shopping destination is to be realised, then the Plan must be mindful of the extent to which it allows the scale of District Centres to grow. Promoting and allowing large scale retail developments to proliferate elsewhere in the Dublin City Region, potentially seriously adversely affects the Retail Core.

### **2.3 Linking the "older" and "new" city centre**

The Plan must seek to strengthen the linkage between the "new" parts of Dublin city centre, around the Docklands area, and the "older" parts of the city surrounding O'Connell Street.

With its major new infrastructure - including office developments, the Dublin Convention Centre, the Luas Docklands (Line C1), the O2, the Grand Canal Theatre and the Samuel Beckett Bridge - the Docklands area continues to increase its role as the new international welcome hub in Dublin for tourists, delegates and knowledge workers. Given the need for tourists, visitors and workers to be able to enjoy leisure activities within relative close proximity to the Docklands,<sup>2</sup> it is critical that the Plan encourages development and rejuvenation in a manner that better links the Docklands area with O'Connell Street, the Italian Quarter, Temple Bar and Grafton Street.

The Plan should also enable the City Council be more proactive in the Compulsory Purchase Order of poorly utilised properties so that new streetscapes, which enable greater permeability within the district, can be created.

Overall, future planning should actively seek to encourage families to live in the city centre and help ensure visitors feel secure by linking restaurants, entertainment venues, retail outlets and family living in a clean, green and safe way. Intelligent planning will help ensure that the full benefit is leveraged from the new infrastructure in the "new" part of the city centre.

## **3. Transport Development & Infrastructure**

### **3.1 Transport Development**

The draft Plan must explain in detail how the city will adapt during and after the construction of the Metro North and DART Underground projects. Given the severe disruption which will inevitably arise for the entire duration of the plan, the absence of any indication about traffic management, access to car parks and measures to keep the commerce of the city open at all times is a major flaw in the draft Plan.

Dublin Chamber welcomes the aim to connect the city through a network of transport infrastructure that makes it easy to move around the city. However, we are concerned by the stated priority to pursue "a modal shift from private modes of transport, to public transport, cycling and walking and extends the use of Travel Plans... Dublin City Council will seek to achieve modal share targets crossing the canals of 55% for Public Transport, 15% for cycling, 10% for walking and 20% for private car use in the annual cordon count by 2017".

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<sup>2</sup> Many facilities that provide services such as needle exchange, drug treatment and sheltered accommodation have been consolidated in the inner city centre in recent times. Dublin Chamber believes these important facilities would better serve the needs of its clients if based in their community.

The transport network of the Dublin City Region needs to be significantly upgraded through the delivery of the rail projects outlined in Transport 21 and the Eastern Bypass if it is to become an integrated system that would realistically encourage a modal shift to public transport. There are project plans in place for the construction of the Metro North, DART Underground and Luas BXD. Dublin Chamber believes these projects must be in place before the above stated aim is aggressively pursued.

Dublin Chamber welcomes the recognition in the draft Plan that "a number of key road capacity improvements are required to facilitate the sustainable movement of goods and people throughout the city and to ensure ease of access", and supports the policy of the City Council "to support the provision of an Eastern By-Pass Route".

In relation to the new Dublin Bus routes which will be introduced in 2010, the construction of Park and Ride facilities and the Dublin Integrated Transport Ticket, the Plan must be amended to include action plans specifically to deal with the rolling out of these projects.

Dublin Chamber calls for more comprehensive information on the proposed action than "It is an objective of Dublin City Council...to support and facilitate the implementation of Integrated Ticketing and Real Time Passenger Information systems across the public transport network in association with relevant transport providers and agencies...to seek to ensure the implementation of Integrated Ticketing across all public transport modes within two years of the adoption of the Development Plan."

The Plan should also clarify how the Plan will co-exist with the transport and land-use strategies being developed by the National Transport Authority, and make a clear policy statement about the future of the East Link Bridge once the current toll concessions end. A priority of the Plan should also be the construction of a bridge connecting Sir John Rogerson's Quay with the East Link, and contrary to current policy this facility should be open to private vehicles.

### **3.2 Infrastructure**

The Plan must facilitate operators wishing to introduce faster broadband speeds. The guidelines on telecommunications antennae should therefore be interpreted so as to encourage such investment.

## **4. Sustainability**

Dublin Chamber welcomes the Plan's focus on ensuring "Dublin becomes a quality, clean, green and accessible city". However, there is a need for the Plan to address the issue of sustainability and the environment more comprehensively, by outlining specific actions that can be implemented to 2030 and beyond to reduce greenhouse gas emissions, and improve energy efficiency and the security of Dublin's energy supply.

One matter where the Plan could be more specific is in the area of energy efficiency of public buildings, including many occupied by the local authorities. Much tougher BER standards should be imposed and a city-wide retrofitting programme undertaken of all houses owned and managed by the City Council.

However, no measures should be introduced unless a positive cost benefit is clearly established. Dublin Chamber would also encourage the inclusion of a series of verifiable environmental indicators, such as those used in the Siemens European Green City Index, within the next draft of the Plan.

The DART Underground, the possible roll out of more hybrid buses, an ambitious expansion of the electrification of the urban rail network and a move to electrical vehicles would impact quite significantly on the environment and infrastructure of the city, yet these are not given serious consideration in the draft Plan.

Furthermore, Dublin Chamber calls for the Development Plan to give greater consideration to the role Dublin Port plays in the City Region and its future development. It is recognised that Ireland's economic recovery will be export led and in that context having accessible, well-connected Port facilities is a national imperative. The Plan must incorporate the findings of the Indecon report, 'Dublin Port National Development Plan Study', in particular its recommendation that nothing should be done at a policy level to hinder either the expansion of Dublin Port or the proposed development of Bremore and its conclusion "our analysis also indicates that the closure of Dublin Port is not justified on economic grounds as the benefits of alternative land use is less than envisaged and that these and other benefits would not justify the cost involved".

Likewise, the future development of Dublin Bay must be considered more comprehensively within the Plan and those of the other Dublin local authorities.

Finally, Dublin Chamber notes that the draft Plan highlights that the Liffey quay walls are 'badly exposed to a 200-year flood event.' Despite this daunting assessment, there are no specific plans to address what could be a catastrophic event for the core of one of the capital's business districts, the IFSC. Dublin Chamber calls for a more comprehensive action plan to be included in the final version of the Dublin City Development Plan 2011-2017 to deal with such an eventuality.

## **5. Other**

The final version of the Development Plan should contain Key Performance Indicators against which the implementation of the Plan can be assessed.

Finally, the Development Plan should incorporate the findings of the Local Authority Efficiency Review Group and should, in particular, provide a clear statement as to how the emerging recommendations will be implemented.