



Planning Dublin's Future – The Business View

Submission to Dublin City Council

Draft Dublin City Development Plan

2005 – 2011

June 2003



This submission is addressed to Dublin City Council in the context of the review of the City Development Plan 1999 and the preparation of a new Development Plan 2005 – 2011.

It is recognised that while the Development Plan is a statutory document which deals primarily with land use, it has much broader implications for economic development, housing, traffic, transport, and many other issues which affect the development of the city and the broader Dublin region.

Dublin Chamber of Commerce is firmly pro-Dublin. Our future vision of Dublin is for “a city with an atmosphere of vibrancy, optimism and confidence - an atmosphere generated by the high quality of life and positive economic expectations. It is a city that is a joy to live and work in and to visit. It is efficient, safe and easy to get around. It is a city that works. It is the best city for business.”

We are confident that the strategies and policies outlined in this document, with the support of Dublin City Council, will be instrumental in delivering that vision.

*Clive Brownlee
President*

*Dublin Chamber of Commerce
June 2003*

Summary of Recommendations

Overall Strategy

- The Plan must be considered in the context of the development of the Greater Dublin Area
- The city centre must be maintained and enhanced as the centre piece of the urban area

Future Developments

- Economic development and regional spatial strategies must run in parallel
- New commercial zones for service based small companies close to city
- Increased densities in new developments within the metropolitan region
- The retail and commercial core of the city centre must be maintained
- A clear strategy for the development of tall buildings is required

Infrastructure

- The Dublin Waste Management Strategy must be implemented
- Zoning and planning is required for the Waste to Energy plant at Poolbeg
- New buildings to include enhanced waste and recycling facilities
- Internet cabling included as essential service in new buildings

Transport

- Additional Quality Bus Corridors
- Macken Street Bridge
- Vehicle management strategy at Port Tunnel East Wall exit
- Enhanced Dart and suburban rail programme
- LUAS extensions
- Eastern Bypass
- Public Transport interchanges

Recreation and Tourism

- Extend sports and recreation facilities
- National stadium close to city centre
- National Conference Centre
- Additional tourism supports

1. Introduction and Overview

In addressing a development framework for the city of Dublin, there are two fundamental premises to which the Chamber ascribes. These are:

- A regional planning approach to the Greater Dublin Area:
- The importance of the city centre as a vibrant core.

1.1 Greater Dublin Area

Planning for Dublin City must be considered in the context of the overall development of the Greater Dublin Area (GDA). The Strategic Planning Guidelines have identified the territory which constitutes the GDA, and has subdivided these into Metropolitan and Hinterland areas. The Metropolitan Area takes in population centres in adjacent counties such as Greystones and Maynooth, while the Hinterland Area includes adjoining towns such as Drogheda, Navan, Newbridge and Arklow.

While there was merit in dividing the former Dublin City and County local authority structure into four independent local authorities from an organisational effectiveness point of view, there is a necessity for a regional approach to planning and land use development. The current structures of independent local authorities, each with their own development plans, does not provide for that approach.

Dublin Chamber of Commerce has strongly supported the Government's commitment to establish a Greater Dublin Area Land Use and Transport Body. The original proposal for this were outlined in the Government publication "New Institutional Arrangements for Transport and Land Use in the Greater Dublin Area" (Blue Book) of April 2001. The commitment has subsequently been re-iterated in the current Programme for Government. To date, however, there has been little visible development in the establishment of this proposed body.

The Chamber also notes with concern the lack of a statutory basis for the enforcement of the existing Strategic Planning Guidelines, following the decision of the Courts in the case of County Meath. If there is to be a coherent strategy for the

future spatial development of the Greater Dublin Area, it requires a regional land use strategy with statutory enforcement.

The National Spatial Strategy also says that Dublin needs effective strategic planning and better management of the strong development pressures within it to secure and consolidate that role for the future:

“Dublin will continue to grow in population and output terms. However, it is not desirable for the city to continue to spread physically into surrounding counties. The physical consolidation of Dublin, supported by effective land use policies for the urban area itself, is an essential requirement for a competitive Dublin. Consolidation is also required for the public transport system to function effectively. In turn, investment in public transport will assist in promoting a more efficient and competitive Greater Dublin Area.” (National Spatial Strategy, 2002)

1.2 Dublin City Centre

The health of the city centre as a vibrant and viable commercial, tourist and residential district must be paramount in the planning framework.

Dublin has been fortunate up to now that it has retained a strong retail and commercial core within the city centre. However, development trends in other cities, particularly the USA, which have led to the demise of city centres are already becoming evident in Dublin. These trends include:

- A shift in population, particularly families, towards the outer suburbs and adjacent towns;
- City centre traffic congestion;
- Development of large scale out-of-town shopping precincts;
- “Edge city” phenomenon, whereby local authorities adjacent to the city promote “town centres” which compete with the core city centre.

Although Dublin has maintained the vibrancy of its city centre, it should not be taken as a given that it will be retained indefinitely. The city centre has already witnessed the early stages of urban dereliction in the O’Connell Street area, and has had to

take urgent and remedial action to address that decline. A number of former leading retail streets have also gone “downmarket”, while some cinemas have also departed the city centre. There have also been serious concerns about increasing crime levels, particularly late at night.

More recently, traffic problems exacerbated by signage problems and work on the LUAS light rail have had negative effects on retail sales within the city centre.

The Development Plan should ensure that a balanced set of measures is included to maintain and enhance the vibrancy of the city centre.

2. Population and Future Development Trends

The population of the Greater Dublin Area (GDA) is currently in excess of 1.5 million people. This has increased by more than 185,000 since 1991 when the GDA's population was 1.35 million. The population of the GDA represents some 39.2% of the total population of the State.

Current demographic trends suggest a population in the GDA of 1.9 million by 2020, out of a national population of 4.4 million, and a population of 2.2 million by 2030, out of a national population of 5 million. In addition to larger population, the trend is also towards smaller household sizes, with an increase in single parent households and a trend towards apartment living.

These trends pose a considerable challenge towards the provision of accommodation in Dublin over the coming years.

2.1 Residential Development

The lack of affordable housing is one of the impediments to the natural development of the city and the Greater Dublin Area. The availability and cost of accommodation applies across a number of sectors – transient accommodation for temporary workers, student accommodation and, specifically, affordable accommodation for middle-income workers. Given that the average price of a house in Dublin now approaching €300,000, it is clear that the affordability of housing will continue to be a major issue for some time.

Dublin also requires a substantial amount of accommodation for rent, given that the economic profile of the city is one which allows for workers to move freely to and from Dublin as their job requirements dictates.

While there has been some softening in house price increases recently, values in the Dublin market are not expected to go into decline because of the demographic profile.

The opening up of land close to Dublin as part of an overall land use strategy, accompanied by the provision of transport and other necessary infrastructure, will allow for more housing development. Planning for this should be overseen by the proposed Greater Dublin Area Land Use and Transport Authority in the context of the Strategic Planning Guidelines. In the absence of this body, Dublin City Council should proceed nonetheless with greater use of available lands, such as the North Fringe and other smaller pockets within the city boundary.

There may be scope also for the use of development levies to fund the infrastructure required for new housing developments. There is provision in the Planning and Development Act 2000 for Planning Authorities to adopt Development Contribution Schemes to support infrastructure that includes in addition to water and sewerage, road and rail infrastructure through the levying of capital fees in effect on new development. One Local Authority has already applied a levy in the range of €3,000 per new housing unit to finance sport and recreation infrastructure.

Within the city, there is clearly a necessity to maintain high densities in the provision of new housing and apartment schemes. Here again, the trade-off between building heights and the availability of urban space becomes an issue. While there is no desire to return to Ballymun Towers type developments, there is still a necessity to maintain space at ground level for recreation, car parking, and other social facilities.

The increase in population in the city centre in recent years has been a very positive development, and should be maintained. Between 1961 and 1991, the population of the inner city fell by more than half (53%). In the past ten years, over 50,000 people have moved in to live in the centre city. However, the profile of city centre residents is mixed, and there continues to be an absence of families, who prefer to live in the suburbs or – in more recent times – in the commute towns close to Dublin.

In terms of maximising densities, the trend – as in recent years – needs to be in favour of apartments and other multi-story dwellings rather than single housing units. However, this will need a greater mix of units and floor space in new apartment developments. The profile of residents within the city – and particularly in new apartment blocks – is largely a mix of younger and more transient people and

“empty nester” couples, but with a marked absence of families. This contrast with many European cities where it is common for families to live in apartment complexes. Typically, these units are larger, including more bedrooms and storage facilities, and include car parking and open recreation space. This kind of development should be encouraged within the Development Plan.

The Plan should also facilitate and support a greater supply of on-campus student accommodation, which in turn would free up existing apartments and accommodation for general letting. The proposed development of Grangegorman as a campus for Dublin Institute of Technology offers considerable scope for this, and should be facilitated.

2.2 Retail Development

Retail strategy also needs to be considered in the context of the overall spatial development of the Greater Dublin Area.

The region has experienced considerable retail development over the past decade. This has come through population growth and higher disposable incomes as well as a greater range of choice of goods being made available. Dublin City has experienced new retail developments, although most of the expansion in retail space has taken place along the M50 (Liffey Valley, Blanchardstown) and in the suburbs (Swords, Dundrum – currently under development)..

City centre retail makes a major economic contribution to the city. It is primary income provider for Dublin City Council through commercial rates. Some 16% of shoppers in the city centre are overseas visitors. Overall, retail in Dublin sustains in excess of 30,000 jobs.

While again emphasising the necessity to maintain and support the retail and commercial core of the city centre, the Chamber supports the development of regional and district shopping centres, based on the designated development areas as outlined in the Retail Planning guidelines. Any other scale large retail development

should be concentrated in the new population centres outlined in the Strategic Planning Guidelines.

Dublin Chamber is also supportive of the increase in the cap size of supermarkets to 3,500 sq. metres in Dublin, and welcomes the recent Bord Pleanála ruling in that regard. This will allow for increased retail competition which will benefit the consumer, but is in keeping with the overall spatial development of the retail sector. The Chamber would have serious concerns about any substantive increase in maximum floor sizes for new retail developments.

2.3 Economic Development – Spatial considerations

There is a strong linkage between spatial strategy and economic development, and there are many lessons which can be learned from other cities. The development trends in two cities which have already undergone the economic and spatial development which Dublin is currently undergoing - Boston and San Francisco – are useful case studies

Like Dublin, both cities are coastal, with limited spatial expansion options. A number of other similarities are evident. All three are regional economic capital of similar population size. Each has a growing industrial hinterland, with developed clusters of knowledge based industries. There is little manufacturing industry remaining, particularly close to the main population centres, and most economic activities are service based. The development patterns of both Boston and San Francisco have seen a growing high-tech industrial base expanding into their hinterlands- Route 128 in Boston and Silicon Valley, emanating from San Francisco. Their city centres have become the administrative and financial capital of the region, while a strong focus on the preservation and enhancement of their downtown areas have given rise to enhanced quality of life in both cities. In turn, this has made them highly attractive tourist and visitor centres

Dublin is at a less developed stage than those cities, but is currently undergoing the development challenges which they have already encountered.

In the case of both Boston / Route 128 and San Francisco / Silicon Valley, which are leading centres of knowledge-based employment, centres of critical mass have developed. Key elements of these are supply of high quality labour force, access to an international airport and other transport links, proximity to universities and research centres, and a supportive high quality of life.

In Dublin's case, there is unlikely to be any growth in traditional manufacturing sectors. Future jobs are likely to be knowledge-based, requiring highly-skilled, creative and flexible people, in operations that involve global value chains and that are globally competitive. These jobs will require high-quality communications infrastructure, competitive services, and a high quality of life.

The Strategic Planning Guidelines have already suggested urban clusters such as Naas-Newbridge-Kilcullen, Drogheda, Navan and Wicklow which can meet those criteria. In turn, these can become home to new economy industries for whom proximity to the services which Dublin currently provides is of paramount importance. This development pattern is already taking place with major industries such as Intel, Hewlett Packard, Dell and Wyeth locating their operations outside of the city, but with close access to the main services.

The location of such industries in an arc surrounding Dublin can free of valuable space in the city and reduce congestion. Similarly, space in the city, including older buildings, can be freed up to meet the demand of growing businesses, particularly for small and start-up businesses.

Recent developments within the city which can attract small business and service operations such as the Guinness Enterprise Centre, the MIT Multi Media Lab, the Digital Media District and the development of Dublin Docklands are highly welcome.

The Development Plan should seek to develop further clusters of commercial / service activities in locations close to the city.

2.4 Area Based Planning

The policy of planning and developing discrete areas and districts of the city has worked well in Dublin in recent years. Good examples of this include Temple Bar, Finglas Village, the Integrated Areas such as HARP and Ballymun, and the various district schemes in Dublin Docklands.

This approach to planning should be spread right across the city, with area based plans developed in consultation with local business and residential groups. It will also facilitate the process of approving planning applications for individual buildings and developments within the area plan.

2.5 Building heights

There needs to be a clearer strategy within the Development Plan in relation to building heights.

Current policy in planning appears to derive from the DEGW consultant's report which said that Dublin should remain as a low to medium rise city, It recommended that buildings higher than 50 metres - 12 storeys - should be the exception, with much lower buildings being the general rule.

While there is a consensus that Dublin should not become a high rise city, neither should it become a more dispersed city. If maximum use is to be made from higher densities without sacrificing valuable urban space, there would appear to be greater scope to accommodate tall buildings.

These could be clustered in specific areas or districts eg Docklands, with appropriate area-based planning to ensure a consistent and harmonious approach to the urban skyline.

Architectural merit must also be given priority in the development of a high-rise districts. Well thought out architecturally designed high-rise buildings can give a new sense of character to otherwise run-down and derelict sites.

3. Infrastructure – Waste Disposal and Telecommunications.

3.1 Waste Management Infrastructure

The Chamber supports and endorses the current Dublin Waste Management Strategy. Its intent is to dramatically cut dependence on landfill from approx. 80% for all wastes in 1997 to 16% by 2004. The Chamber also supports the objective of increasing the recycling of Dublin's municipal, industrial and construction/demolition wastes from a current 20% to some 60%. This will require new recycling schemes and a thermal treatment plant.

Waste to Energy Facility

The Chamber favours the current proposal for the construction of the waste to energy facility on the Poolbeg Peninsula and the accompanying zoning of the area for that use.

Residential Recycling Facilities

As a means of increasing the availability of recycling facilities for those living in higher density developments, new planning regulations should make it obligatory for all new apartment and high-density developments to be fitted with communal depositories for storage of recyclable material

Planning

The lengthy planning delays experienced when developing waste management infrastructure must be addressed.

Funding

A more realistic economic model for the cost of waste collection and disposal must be developed. This should involve a more equitable spread of the costs of waste management between residential and business users

3.2 Telecommunications

The development of Dublin as a knowledge economy requires access to high quality telecommunications networks and services. Hence, provision of telecommunications

infrastructure in new developments will have to be an essential provision such as electricity supply or water.

Changing bandwidth demands will require new fibre, ducting and kerbside electronics. In the development stage of new buildings, it is relatively cheap to provide such services. However, it is more costly to install cabling after the development has taken place. By providing the infrastructure in a planned way at the time of construction, the most expensive component of telecommunications (civil works) can be reduced by 90%. In turn, this provides the opportunity to reduce the price of services to the end user.

At present, the telecommunications infrastructure in new developments is seen by some developers as an afterthought, with the ducts for copper and fibre cable often squeezed in at the last moment (if at all). Equally, some developers have come to regard additional income from exceptionally high rates/leases applied to duct infrastructure in business/technological parks as being the norm. It must be recognised at the planning stage that the first mile costs of providing access to customers has to be fully cost reflective. By mandating the provision of basic infrastructure at the planning stage, significant costs savings will be realised and minimum quality levels can be enforced.

In Korea, for example, there is a cyber certification programme for offices and apartments, asserting that certified premises meet minimum levels of ducting and cabling for a high quality broadband installation. This model could most usefully be applied to Dublin.

The planning regulations should stipulate that ducting, fibre and kerbside electronics are included as part of the essential services in all new developments.

4. Transport

Over the next three years or so, many key transport projects will have been completed and commuters should start to enjoy reduced journey times. The priority for the period 2005-2011 must be to build upon these successes.

Many of the city centre projects that are currently at the planning stage, the city centre – airport rail link, the Macken St Bridge, the Luas Docklands extension and the Spencer Dock Rail Station, are scheduled to become operational during the timeframe of the development plan. Many other key projects, such as the Rail Interconnector, will be undergoing further development.

4.1 Public Transport

Quality Bus Corridors

Quality Bus Corridors have proven to be an excellent measure in the improvement of public transport networks. There are still issues to be resolved on some routes (eg relocation of existing bus stops, improved junction layouts etc). The Chamber supports the proposed extension of the QBC network.

Metro

The proposed Metro would be a highly efficient public transport method capable of moving large numbers of people, and its alignment should be included in the Development Plan. Since Metro can use numerous carriages as opposed to single trams used by LUAS, it makes far greater use of rail in the city centre, and avoids the traffic congestion factor which frequent tram crossovers on city centre streets would cause.

Separately, Dublin Chamber of Commerce has supported a fast rail link from the Airport to the city centre (not necessarily a Metro). The ideal scenario would be to have both (similar to the Underground and the Heathrow Express ,which both serve Heathrow Airport)

Luas

With both Luas lines A and B scheduled to be operational by the second half of 2004, the issues going forward include integration with buses, integrated ticketing, park and ride facilities and the extension of LUAS to Docklands and connection with Airport Metro

- Park and ride - A substantial increase in the number of parking spaces required at the Red Cow depot – likely to involve multi storey car parking rather than planned surface-only parking.
- Extension to Docklands – the Chamber will make a separate submission on the favoured route, but strongly supports the proposed extension to the Point Depot;
- Extension from Sandyford – Chamber supports the extension towards Shanganagh; since this is part of the line which is intended to be upgraded to form part of Metro, the route alignment and stations should allow for metro configuration;
- Improved mobility at the Red Cow roundabout – likely to involve a road flyover or underpass to prevent congestion and allow for bus and car access to the LUAS stop and the park and ride.

Rail Projects

The Chamber supports the development of the rail network in the Greater Dublin Area, with the following specific recommendations:

- upgraded signalling on the northern, Maynooth and Kildare lines to allow a substantial increase in the number of peak hour trains;
- lengthening of platforms to allow 8-car DART and Arrow trains;
- new platforms in Connolly Station;
- the removal of level crossings on the DART line south of Pearse Station;
- segregation of intercity services from suburban services on the northern and Kildare lines. This requires three-or fourtracking from Connolly Station to north of Howth Junction and four-tracking from Cherry Orchard to Sallins.
- New station at Tara St
- New Spencer Dock station
- Four tracking the northern suburban and Maynooth lines
- The Interconnector

Suburban Rail Interconnector

The recently published Strategic Rail Review supported the need for the Interconnector. This will allow for through running from the Kildare line to the Maynooth and northern lines. It will provide a by-pass to the east of the existing severe bottleneck approaching Connolly Station, and serve areas of high demand, especially the south-east inner city and Docklands. It will also allow for the maximum use of the Maynooth and Kildare lines.

Airport Rail Link

Provision should also be included for a Fast Rail Link to Dublin Airport. If provision is not made now for future rail station as the terminal is being expanded or new terminal is being built it will not be practical to build a station later on. For example, about 80% of the capital investment in a modern airport is in the terminal (rather than the runway, the control tower, and other facilities) and that, given the complexity of terminals in relation to passenger flow routings for inbound & outbound and baggage handling facilities, the cost of changing things around later is enormous. Without a predetermined route, the cost of building a new airport link becomes prohibitive.

Public Transport Interchanges

There is opportunity in the Development Plan to improve public transport usage through the development of quality public transport interchanges. Possible locations within the city for interchanges are St Stephen's Green, O'Connell St, Connolly Station and Drumcondra Rail Station.

Central Rail Station.

This is a vital component of any integrated transportation infrastructure in a city such as Dublin. In practical terms it is not possible to adequately facilitate and encourage effective mode change and passenger interchange without a central hub such as is created by a central rail station.

4.2 Roads

Eastern Relief Route

The Eastern Bypass, which would connect the N11 with the Port Tunnel and thereby complete a ring road around the city, has been on the Chamber's agenda for many years. To date, there has been very little progress on this project.

It is essential that the alignment for this is included in the Dublin City Council and Dun Laoghaire Rathdown County Council Development Plans. It is an essential requirement to making best use of M50 and in relieving congestion, improved traffic management, and greater efficiency in bringing goods to market.

Dublin Port Tunnel

The Port Tunnel is due to open in 2005. There are still issues to be resolved in relation to traffic management and the development of suitable road infrastructure at the East Wall exit. It is recognised that there is potential for severe traffic disruption at the exit, and this should be resolved in advance

Macken St Bridge

Connecting Macken Street to the south of the Liffey with Guild Street to the north, the Macken Street Bridge is an essential project to improve road and public transport access in the docklands area. Additionally, alongside the Blackhall Place Bridge, it will form a key part of the strategy to divert traffic away from the city centre and onto the inner and outer ring routes.

Given that the bridge is such a vital part of Dublin City Council's city centre traffic management plans, the introduction of further left and right turn bans on traffic in the city centre should be dependent on the start of work on the bridge.

4.3 Transport Management

Congestion Charges

There are several examples of congestion charging in use internationally, but the most common one is to charge for cars entering a city centre cordon. Singapore and Oslo have had city centre charges in place for many years, although a number of

smaller cities have also had more limited schemes in place. Congestion charging can be justified on economic grounds, since a pricing mechanism is considered the most efficient way to allocate scarce resources.

At present, there is a “wait-and-see” attitude towards the London scheme, which has been relatively successful since its introduction. However, at present, the Chamber would not favour a congestion charge for Dublin city centre having regard to (a) its likely negative effects on city centre retailing (b) the absence of public transport options for many commuters and (c) the high cost of introducing a scheme.

Public Transport Market Reform

The Chamber supports the introduction of competition into the public transport market, and endorses the recommendations of the NERA/TIS study which recommended that the existing bus network should be tendered out in bundles of routes.

From a planning point of view, the Development Plan should allow for bus stops to be shared between Dublin Bus and other private operators.

5. Recreation and Tourism

The Development Plan can make a substantial contribution to the city's tourism industry. At present, the industry supports some 30,000 jobs in the city.

Sport facilities

The availability of sports and recreation facilities within the city is critically important in the maintenance of quality of life for Dublin residents.

The Development Plan should at least retain the existing level of playing pitches and other sports facilities within the city, and seek to expand such facilities where possible.

There should be strong enforcement of the zoning of sports and recreation facilities, and proposals to rezone such facilities (such as what happened to Glenmalure Park in Milltown) should be strongly resisted.

National Stadium

The proposed National Stadium is a highly welcome project, and should be actively supported through the City Council's planning and development channels.

Ideally, the Stadium should be located in the city centre . Chamber surveys show that both locals and visitors who attend sporting events favour locations such as Lansdowne Road or Croke Park, which are easily accessible and which have facilities close by such as hotels, restaurants, pubs and other services used regularly by matchgoers. This adds to the atmosphere and positive experience of attending a major event in Dublin, makes the city a much sought after destination for travelling sports fans, and adds to tourism revenue. It is difficult, if not impossible, to replicate both the facilities and the atmosphere in locations away from the city centre.

The redevelopment of Lansdowne Road – if it is feasible – would be the ideal solution.

A recent survey of Chamber members showed:

- 96% consider that a second stadium is needed;

- 74% say that its optimum size should be 60,000 seated spectators;
- 76% say that it should be in a venue close to the city centre, with most (62%) favouring a Lansdowne road redevelopment; only 17% supported the Abbotstown proposal.
- 89% said that Croke Park be opened to host fixtures of other sports

National Conference Centre

Numerous reports show that Dublin is missing out on lucrative conference business by not having a facility of scale capable of accommodating internationally mobile conferences.

The best model for a city of Dublin's size is one capable of accommodating 2,000 - 3,000 conference guests seated, with supportive exhibition and breakout space, in a venue close to the city's main hotel, retail and other facilities and accessible via high-quality transport link

International research shows that conference centres attract a lot of high spend visitors. So, while they are loss-leaders, they bring significant benefits to the surrounding economy. Economic estimates show that Ireland would gain an extra 30,000 visitors and €50 million in tourism revenue each year from a project of the required scale.

Other tourism projects

The Development Plan should support other tourism attractions such as

- urban fabric - increased pedestrianisation and use of open space;
- maintenance of the built heritage – public buildings, the Georgian Quarter, and buildings of architectural and historic importance;
- development of new festivals
- development of tourism districts e.g North Great Georges Street Georgian, Smithfield
- New berthing facilities to provide for cruise line business