



Submission on the Poolbeg West SDZ Planning Scheme Material Alterations

July 2017

Dublin Chamber welcomes this opportunity to comment on the Material Alterations to the Planning Scheme for the Poolbeg West Strategic Development Zone (SDZ). As the representative body for businesses in the Greater Dublin Area, the Chamber has a cross-sectoral membership of 1,300 firms employing 300,000 people. We are committed to improving the city's business environment and quality of life in tandem.

Dublin Chamber outlined its priorities and concerns regarding the Draft Planning Scheme in a detailed submission in March 2017. The submission, which is available for reference online at <http://www.dubchamber.ie/policy/policy-reports>, emphasised the need for long-term planning and joined-thinking in the Dublin region. It draws particular attention to the current and future demographic pressures facing the Greater Dublin Area, and argues that these trends should inform policy on residential capacity and transport provision within Dublin City. With specific reference to the Poolbeg West SDZ project, Dublin Chamber advocates greater density to meet urban housing demand and to facilitate investment in public transport.

Further to this submission and to the proposed Material Alterations, Dublin Chamber wishes to comment on two closely connected features of the revised Draft Poolbeg West SDZ Planning Scheme: **Population Density**; and **Public Transport Provision**.

1. Population Density

Dublin Chamber is a strong advocate for the economic, social, and environmental benefits of urban density. Failure to achieve adequate population density in urban areas is a significant contributor to Ireland's current housing, public transport, and infrastructure problems. The scarcity of sites available for new large-scale residential development in Dublin City places a heavy onus on planners to make the most effective possible use of remaining opportunities. The case for high density is particularly acute in the case of the Poolbeg West SDZ, given the severity of the housing supply shortage and the relative centrality of the SDZ location.

Dublin Chamber welcomes the decision to amend height restrictions to facilitate a possible increase from 3,000 to 3,500 units, providing potential capacity for a further 1,000 people in Poolbeg West. The Chamber was concerned by the low number of homes planned for the Poolbeg West SDZ in the original scheme. However, the Chamber notes that, with a

projected population of c. 8,000 people, the entire Poolbeg West development will still be likely to meet just one year's supply of required housing for the Dublin City local authority area, not taking into account the considerable pent-up demand within the said area and elsewhere. This seems a missed opportunity given the general requirement to meet urban housing demand while reducing low-density urban sprawl. To give the city the benefit of higher density, while reducing expensive infrastructural pressure on Dublin's low-density hinterland, a greater share of East Leinster's population growth should be provided for in Dublin City.

On balance, Dublin Chamber believes that the revised Planning Scheme is not sufficiently ambitious with respect to housing capacity given the scale of the challenges facing the capital city region. Moreover, the Chamber is concerned that there is a disjunction between the housing and transport plans for Poolbeg West.

2. Public Transport Provision

Dublin Chamber remains concerned that the number of units planned for Poolbeg West will not be sufficient to make a light rail service viable, and that the planned Luas extension will never be built as a result.

While the Draft Planning Scheme states that 'Rail & Light Rail' will be a core part of the public transport offering for residents and workers in Poolbeg West, there are no provisions in the plan – or in the National Transport Authority (NTA) Strategy 2016-2035 – to bring heavy rail to Poolbeg. The scheme points instead to the Sandymount and Lansdowne DART stations as rail options. These are described as being 'approximately 20 minutes' walk' from the SDZ boundary. This estimate is based on the shortest route possible. In practice, most residents of Poolbeg West will live much further away; the walking distances and times for those living at the furthest points of the SDZ are:

- To Lansdowne Road Train Station: 2.4km / 30-35 minutes
- To Sandymount Train Station: 2.5km / 30-35 minutes
- To point Village Luas Stop: 2.6km / 30-35 minutes

The extension of the Luas Red line will be needed to address this problem, and the NTA Strategy 2016-35 includes a proposal to extend the Red line to Poolbeg. This is also envisaged in the Draft Planning Scheme. However, the Luas extension will be contingent on the number of people living in the area.

The NTA has categorically stated that the original plan for 3,000 units in Poolbeg West would leave the area considerably short of the population level that would be required to make the construction of a Luas line viable. While the provision for a potential 500 further homes is very welcome, there is still no clarity as to whether this will be adequate to support the necessary public transport improvements. There is now a significant danger that this opportunity will be missed, permanently undermining the success of the SDZ project.

Dublin Chamber strongly advises that the revised Draft Planning Scheme for the Poolbeg West SDZ should not be approved without joined-up thinking on the housing capacity and transport requirements of the area. Dublin City Council should seek full clarification from the NTA regarding the population density required to support a Luas extension, and the Planning Scheme should be adjusted accordingly to ensure viability.