



Submission to the Eastern & Midland Regional Assembly on the Draft Regional Spatial & Economic Strategy

January 2019

As the representative body for businesses in the Greater Dublin Area, Dublin Chamber is the largest Chamber of Commerce in Ireland. The Chamber's cross-sectoral membership base comprises 1,300 firms, spanning the spectrum from micro-enterprises to multinationals, and supports 300,000 jobs nationally. This gives the Chamber a keen insight into the needs of both businesses and their employees.

Dublin Chamber is pleased to make this submission to the Eastern & Midland Regional Assembly in response to the draft Regional Spatial & Economic Strategy (RSES) and Metropolitan Area Strategic Plan (MASP) for Dublin. The global competition for investment, jobs, and talent is now as much between city regions as between nation-states, and Dublin is Ireland's only urban region of sufficient scale to compete realistically with the world's great cities. The draft Dublin MASP represents an opportunity to provide for the future, if it is implemented effectively.

The Chamber broadly welcomes the RSES and MASP. However, it also has significant concerns about effective implementation. Section 1 of this document provides context for Dublin Chamber's remarks by summarising the Chamber's position as outlined in previous submissions, while Sections 2 and 3 deal with the Chamber's response to the goals of the strategy and concerns about its implementation respectively.

1. Principles of Spatial & Economic Planning

Dublin Chamber has repeatedly outlined the principles that we believe should govern Irish spatial and economic development in a series of submissions over the past several years, with a view to informing the National Planning Framework (NPF), subsidiary plans, and accompanying National Development Plan (NDP).¹ Key principles include:

- Support for the capital city: There must be recognition that Dublin's large size relative to other Irish cities is a natural feature of urbanisation in a small country where there are inherent limits on the scope for urban critical mass. As Ireland's only city of global scale, Dublin's success is critical to national success. Therefore, Government should support

¹ E.g. Dublin Chamber *Submission on Ireland 2040, the National Planning Framework*, <http://npf.ie/wp-content/uploads/0665-Dublin-Chamber.compressed.pdf>

the intelligent growth and planned development of the Dublin region as Ireland's demographic hub and economic engine now and in the years to come.

- City regions: Ireland's size means that it can only sustain a small number of large population hubs. To ensure a geographically wide spread of economic opportunity, Government should focus growth on a small number of urban centres which will act as drivers of economic and social development in their regions, just as Dublin does in the Eastern & Midland region. On foot of the NPF, Dublin Chamber undertook a campaign in 2018, entitled the National Conversation, to promote discussion about the future of Ireland's cities. The outcome was the establishment of *City Regions Ireland*, an alliance of the chambers of commerce of the 5 cities as identified by the NPF to promote the urban agenda in national policymaking.²

- Urban density: Low-density urban sprawl is an unsustainable development model and a significant contributor to Ireland's current housing, public transport, and infrastructure problems. It chokes off housing supply in high-demand locations, makes infrastructure investments less viable, contributes to traffic congestion and carbon pollution, and encourages longer commuting times, reducing both productivity and quality of life. Dublin Chamber is a strong advocate for the economic, social and environmental benefits of greater urban density. Compact growth will be key to successful urbanisation in the coming years.

- Urban infrastructure: To ensure that urbanisation in Ireland is characterised by improved quality of life and economic efficiency, a sustained increase in capital investment in public infrastructure is required. This should focus on urban areas where demand is greatest and the greatest return on investment can be secured. Dublin Chamber has highlighted the business community's infrastructure priorities for the capital city region in the coming years:
 - Metrolink & the DART Expansion Programme
 - BusConnects
 - Investment in cycling infrastructure and public spaces
 - Eastern & Midland Water Supply Project
 - Investment in social and affordable housing
 - Investment in higher and further education

Dublin Chamber broadly welcomed the NPF. Its goals of equal growth rates across regions; 50% of regional population growth to take place in the five main cities and their immediate suburbs; and 50% of all new development to occur on existing brownfield sites in urban areas are ambitious, yet realistic if the right plan is in place. The Chamber noted, however, that effective governance structures will be critical to achieving these goals.

² *City Regions Ireland* Launch Document, November 2018,
<http://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/City-Regions-Ireland-28-11-18.pdf>

2. Response to Draft RSES: Goals & Strategy

Informed by the principles above, Dublin Chamber made recommendations in a submission to the Assembly as part of the first consultation on the RSES, covering the key issues of population hierarchy, compact growth, and governance, as well as the economic and industrial strategy for the region. With these recommendations in mind, Dublin Chamber's response to the draft RSES is outlined below.

2.1. Growth & Settlement Strategy

Dublin Chamber called for adherence to NPF targets, and called for the RSES to adopt a focused settlement and growth strategy based on a realistic hierarchy of settlements that recognises Dublin as the natural demographic and economic hub of the Eastern & Midland Region, while also supporting planned, and proportionate development of regional growth centres and key towns.

- *Dublin Chamber welcomes the growth and settlement strategy outlined in Chapters 3 and 4 of the RSES.*
- *While Dublin Chamber welcomes the planned development of regional growth centres and key towns as identified in the RSES, there must be commensurate support for the growing social and economic requirements of the capital city region. For example, as Regional Planning Objectives (RPOs) 4.6 and 4.18 specifically mention support for Athlone IT and Dundalk IT, similar acknowledgement must be made of the key role of higher education in Dublin.*

2.2. Compact Development

Dublin Chamber stressed the need for sustainable growth patterns based on compact development through greater urban density and integrated planning. This must replace the older laissez-faire approach to residential development, with low-density sprawl followed by infrastructure development after the fact. With this in mind, the Chamber welcomed the NPF goals of 50% population growth to take place in the five main cities and their immediate suburbs (25% in Dublin and 25% in the other four cities); and 50% of the new development to occur on existing brownfield sites in urban areas.

- *Dublin Chamber supports the RSES goal of compact and sustainable growth, and the target of 50% of new homes in Dublin City & Suburbs to be provided in the existing built-up area through infill and brownfield development, and welcomes RPO 4.3 which calls for consolidation and re-intensification of infill/brownfield sites.*
- *Dublin Chamber is concerned that the definition of Dublin City & Suburbs as outlined in the RSES may in fact undermine the goal of compact development. The Chamber notes that the definition of Dublin City & Suburbs is determined according to Central Statistics Office figures and acknowledges the need for consistent definitions across regions.³ However, the significant quantity of green field land within Dublin City & Suburbs, as so defined, makes it unlikely that brownfield regeneration will account for at least half of new population growth. This is a clear risk that must be accounted for in the final RSES.*

³ CSO, Census 2016 Small Area Population Statistics, SAP Map, <http://census.cso.ie/sapmap/>

2.3. Integrated Transport & Land Use Planning

Over many years, Dublin Chamber has made the case for a holistic plan for the capital city region. Joined-up thinking between transport and infrastructure investment and residential and commercial development is required to improve both economic efficiency and quality of life. The Chamber has also highlighted international examples of international best practice in metropolitan planning, e.g. Copenhagen, where a so-called 'Finger Plan' for city growth has been pursued since the mid-twentieth century, identifying key commuter rail routes and developing residential areas alongside them.

- *Dublin Chamber concurs with the guiding principles for growth of the Dublin Metropolitan Area as outlined in the MASP, and welcomes the identification of 5 strategic residential and employment development corridors based on existing and planned public transport routes.⁴*
- *Dublin Chamber stresses that speedy delivery of the MetroLink project and roll-out of the DART Expansion Programme will be critical to realising the MASP. While acknowledging that national Government support is the prerequisite to delivery of these projects, the Chamber takes this opportunity to encourage a constructive approach to infrastructure projects on the part of all Local Authority members, bearing in mind their responsibility to the city region as a whole. With this in mind, we welcome RPOs 5.2 and 5.3.*
- *Dublin Chamber supports improved access to Dublin Airport in order to strengthen Dublin as a global gateway. However, access constraints should not act as a barrier to airport growth. Infrastructure bottlenecks must be addressed. In the interim, however, allowing Dublin Airport to grow to meet domestic and global demand will ensure that the benefits of increased connectivity are not lost. New transport infrastructure will thereby be provided with the requisite demand to guarantee the economic viability of constructing this infrastructure in the first instance. With this in mind, Dublin Chamber recommends amending Section 5.3 of the RSES⁵ by:*
 - *Inserting the following under the 'Dublin as a Global Gateway' heading: 'Support global connectivity through growth in passenger numbers and air traffic movements at Dublin Airport in line with industry requirements.'*
 - *Similarly, amending the 'Employment density in the right places' section as follows: 'Re-intensify employment within the city and suburbs and at other strategic opportunity sites proximate to public transport nodes such as Dublin Airport'.*
- *Dublin Chamber welcomes the recognition of the importance of cycling infrastructure in the MASP, and takes this opportunity to reiterate business community support for the goals of the Dublin Cycling Campaign, which has called for 10% of all transport funding to go to cycling infrastructure.*
- *While RPO 5.1 refers to supporting 'continued collaboration between infrastructure providers, state agencies, and Local Authorities in the metropolitan area', this should take a more specific form in the final MASP, with relevant bodies named as accountable in the implementation process.*

⁴ EMRA, *Draft Regional Spatial & Economic Strategy*, pp. 67-70, <https://emra.ie/dubh/wp-content/uploads/2018/11/EMRA-DRAFT-RSES.pdf>

⁵ EMRA, *Draft Regional Spatial & Economic Strategy*, p. 67, <http://emra.ie/dubh/wp-content/uploads/2018/11/EMRA-DRAFT-RSES.pdf#PAGE=67>

2.4. Economic Strategy

Dublin Chamber outlined the business community's priorities across a range of headings including industrial development policy, FDI strategy, the digital and green economy, and the retail sector. Over the past several years, infrastructure and housing have consistently ranked as the most pressing public policy concerns for businesses in the Greater Dublin Area according to quarterly surveys carried by Dublin Chamber.

- *Dublin Chamber broadly welcomes the Economic Strategy for the EMRA region as outlined in the draft RSES document.*
- *Dublin Chamber re-emphasises that delivery of adequate housing is the single most pressing challenge facing the economic competitiveness of the Dublin Metropolitan Area at present, potentially impacting the cost and availability of labour as well as international reputation from an FDI perspective. The implications of NPF population targets for housing supply in the Dublin region were outlined in detail in our previous submission. While the Chamber welcomes RPOs 5.4 and 5.5 as principles for residential planning, there is little in the RSES that seems likely to increase delivery of new accommodation to the rate that is required to meet NPF objectives.*

3. Response to Draft RSES: *Implementation & Monitoring*

Dublin Chamber has stressed that effective governance structures, implementation tools, and monitoring processes will be key to the success of the RSES and the NPF more broadly. National, regional, metropolitan and local authority governance structures must be adequate to ensure implementation of the NPF targets on regional growth, density and brownfield development.

3.1. Urban Representation on the Regional Assembly

Dublin Chamber has repeatedly highlighted the issue of urban underrepresentation on the Regional Assemblies and the implications of this for current and future decisions on the planning and governance of the Dublin Metropolitan Area in particular.⁶ Despite being home to 60% of the inhabitants in the Region, the four Dublin Local Authorities have just 43% of the membership of the 38-seat assembly, and similar anomalies exist with respect to other cities. Insofar as the Regional Assembly will have the power to amend the RSES or MASP in future, the concern remains that Dublin is under-represented on the Assembly, and the MASP for Dublin may be determined by non-Dublin representatives.

- *Dublin Chamber calls for this democratic deficit to be addressed by ensuring a more proportionate representation on the Eastern & Midland Regional Assembly.*
- *Dublin Chamber calls for reform of the voting process on the Metropolitan Area Strategic Plan for Dublin so as to ensure only representatives of the affected area hold decision-making power on the MASP and any future amendments to it. The means of affecting both these changes are outlined in our previous submissions.⁷*

⁶ E.g. Most recently, *Dublin Chamber Submission to the Dept. Housing, Planning & Local Government on the Role & Remuneration of Local Authority Elected Members*, October 2018, <http://www.dublinchamber.ie/DublinChamberofCommerce/media/Policy-Documents/Dublin-Chamber-Local-Elected-Representatives-Submission.pdf>

⁷ Ibid.

3.2. Governance Structures to Drive Implementation

Dublin Chamber has stated that the present system of local government is structurally ill-equipped to provide the administrative coordination and accountability that the city requires to implement an effective MASP. To realise its potential, Dublin needs not only a clear common vision for its future, but a metropolitan government capable of making that vision a reality. Strong leadership will be crucial to ensuring that Dublin maintains global competitiveness in the years to come. With this in mind, the Chamber has previously advised that an executive body may be necessary to drive and coordinate implementation of any plan across the city.

- *Dublin Chamber notes that there will be no executive office for the Metropolitan Area to coordinate implementation of the MASP for the capital city region. The Chamber remains concerned that without such a body to provide a single point of authority and accountability, the MASP may not be effective. Dublin Chamber supports the empowerment and resourcing of an executive body to drive implementation across the Metropolitan Area.*
- *The Chamber notes that in the draft document a distinction between the planned RSES & MASP Implementation Groups has not been made, and neither has their planned membership clarified. It seems to be envisioned that these will 'monitor and review implementation' or 'oversee progress' through regular meetings but their authority to actually drive implementation, if any, is unclear.*
- *Based on the language used in the draft document, it is not clear that adequate governance structures will be in place to ensure implementation of the RSES and MASP. It is critical that these doubts are allayed in the final plan by clarifying the role, membership, and authority of any implementation body.*
- *It is important that the water, energy, and transport sectors are closely involved in implementation. In particular, and in light of the centrality of Dublin Airport to the MASP objective of making Dublin a global gateway, the Dublin Airport Authority should contribute to and shape MASP implementation through a position on the appropriate steering group.*

3.3. Achieving Brownfield Development Targets

Dublin Chamber has expressed strong support for a focus on the regeneration of brownfield sites and welcomed the NPF commitment that 50% of all new development will occur on existing brownfield sites in urban areas. Dublin Chambers welcomes the integration of this into the draft RSES but notes that such an ambitious target will require:

- *Dublin Chamber notes that the commercial, administrative, and logistical challenges associated with high-density brownfield redevelopment on a large scale will likely require new policy tools at both national and local authority level, and that these have not been identified in the draft RSES.*
- *Close and continuous engagement with the business sector will be essential to develop the necessary policy tools and address practical obstacles to delivery. With this in mind, Dublin Chamber encourages the Regional Assembly to include the business community in the MASP implementation process.*

3.4. Monitoring Implementation

Dublin Chamber has called for the establishment of a Metropolitan Area Business Advisory Group to share business expertise with the Regional Assembly and provide feedback in relation to implementation of the MASP.

- *Dublin Chamber welcomes the commitment that every 2 years the Regional Assembly will prepare a monitoring report on progress in implementing the Strategy for submission to the National Oversight & Audit Commission (NOAC), which may in turn make recommendations to the Minister. It is important that feedback from the business community is included in these monitoring reports and that they are made publicly available.*
- *Dublin Chamber is concerned that there should be a permanent business voice for consultation in the event potential amendments during the life of the plans.*
- *Dublin Chamber reiterates its recommendation that a Metropolitan Area Business Advisory Group be established to work as part of, or alongside, the MASP Implementation Group, with a view to ensuring business feedback, driving regional development and leveraging new funding, partnership and collaboration opportunities in the Metropolitan Region.*