



Submissions on the Proposed Amendments to the Draft Dublin City Development Plan 2011-2017

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Preface

This submission comments on the proposed amendments to Draft Dublin City Development Plan 2011-2017 as outlined by Dublin City Council. Dublin Chamber has not raised any new issues in this paper, instead reaffirms comments and recommendations made in earlier submissions on the Development Plan.

Overview

Dublin Chamber continues to be unhappy with the central thrust of the City Development Plan 2011-2017, which very weakly focuses on the business agenda. Initial drafts of the Plan, and the current proposed amendments, fail to address the well-documented competitiveness deficits of the Dublin City Region. So Dublin Chamber calls, once again, for the Plan to be focused on fully supporting business activity and growth, and thereby helping to protect and generate employment.

It is essential that the central thrust of the Plan is focused on making the Dublin City Region more competitive by ensuring measures are in place that make it easy for companies to invest in the city (for example, in the area of height and density), and also that the Plan fully manages the wide-spread physical disruption that will take place over the next few years as major transport projects are delivered in the heart of the city.

Comments on proposed amendments

- **Heading 4.4.5 The Public Realm –**

Dublin City Council proposes to add the following new objectives: “It is an objective of Dublin City Council: SCO13A To examine the possibility of closing the area along the River Liffey in front of the Customs House to motorized traffic on Saturdays and Sundays to create a new Public Plaza; SCO13AA To examine the possibility of, and promote the creation of a new Public Realm improvement space in the area fronting onto Trinity College and the Bank of Ireland at College Green”. Dublin Chamber calls for no amendments to be made to the current traffic patterns within the city centre unless extensive, open and honest consultation and engagement has taken place with the business community prior to any plan being put forward for consideration. It should also be noted in considering the use of the public realm, or indeed any further pedestrian enhancements, that the business community in the IFSC/ Docklands area are particularly concerned at the existing poor traffic facilities (flow) for private transport vehicles that are considered essential for their business operation.

- **Heading 5.1.4.3 Public Transport -**

Dublin Chamber welcomes the addition of the following comment: “Dublin City Council consider that the elements of Transport 21 that relate to the city are critical infrastructure projects for the development of a sustainable city. The early delivery of these components of Transport 21 together with Integrated Ticketing is considered necessary to facilitate the full implementation of the Core Strategy. The Council will seek to influence all stakeholders to ensure the timely delivery of these Transport 21 projects.”

In relation to the addition of the new objective “SIO9A To support relevant transport agencies, providers and adjoining local authorities in assessing the feasibility of developing Bus Rapid Transit systems within the Greater Dublin Area”, Dublin Chamber calls on the City Council to give full consideration also to the importance of free movement of private vehicles around the Dublin City Region for business and retail purposes when assessing the feasibility of developing Bus Rapid Transit systems within the Greater Dublin Area. Car based shoppers, diners, tourists, concert and theatre goers, are a critical component of the city's ecology and economy. 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.

In relation to the addition of the new objective “SIO27A To explore the extension of the pedestrian zone in the Grafton Area to include the creation of new pedestrian streets without compromising access to existing car parks in the city centre. Candidate streets for pedestrianisation would include but would not be limited to: Anne Street (south), Duke Street, Clarendon Street and South William Street.” Dublin Chamber calls for no amendments to be made to the current traffic patterns unless extensive, open and honest consultation and engagement has taken place with the business community prior to any plan being put forward for consideration. The current level of access to all business premises must continue for deliveries, clients etc.

In relation to the addition of the new objective "SIO33AA To identify suitable and appropriate new locations including off-street in the city centre for the parking of private or tour operated coaches with a view to discontinuing the practice of allowing coaches to park in such places as Mountjoy Square, College Green, Nassau Street, Merrion Square and Wilson Terrace", the City Council must recognise that tourism is vital to the Dublin economy so any plans to relocate coach stops or restrict passenger boarding and alighting of tourist coaches must be carefully considered and should only be implemented after full consultation with the business community. It is imperative that private operators accessing the city centre to collect/ drop off commuters and tourists are able to continue to offer high levels of frequency and quality services.

- **Heading 5.1.4.8 Road Capacity Improvements -**

Dublin Chamber supports the proposed amendments to policy SI17 to read: "It is the policy of Dublin City Council: SI17 To support the provision of a link between north Dublin Port and the Southern Cross/South Eastern Motorway via an eastern bypass of the City, in conjunction and co-operation with other transport bodies, the National Roads Authority and local authorities. The preferred method is by means of a bored tunnel and the preferred route is under Sandymount and Merrion Strand and Booterstown Marsh. However, the route and detailed design of the link road will be subject to an Environmental Impact Assessment and all statutory requirements, including a public consultation process, by the relevant authorities. An Appropriate Assessment of the proposed project for the entire route is also required in accordance with the Habitats Directive."

Dublin Chamber welcomes the proposal to "amend Figures 5 & 8 to show routes to and from Croke Park and Lansdowne Road Stadium to the city centre as Major Strategic Pedestrian Routes." and to amend Figure 2 & 7 to indicate the full extent of Transport 21 public transportation proposals in addition to existing routes and to provide greater clarity and legibility where possible.

- **Heading 5.2.2 Challenges -**

Dublin Chamber welcomes the amendment of this section to read "The Dublin Region Water Supply Project is in progress to identify a new water supply source to avoid shortages of drinking water in the future. The city needs to develop significant additional capacity for storing treated water to alleviate the risks of water shortages occurring in the event of extreme weather or other mishap."

- **Heading 9.4.1 General -**

Dublin Chamber welcomes the additions made to policy RE2 and RE10 that acknowledge the importance of improving the business environment so that existing jobs are supported and employment generated, and also making the city more attractive/vibrant for residents, shoppers, visitors and workers. However, Dublin Chamber is disappointed that this has not been the central thrust of the Plan as a whole.

- **Heading 9.4.5 Office / Commercial / Employment Space -**

Dublin Chamber welcomes the additions made to policy RE20 which recognized the importance of redeveloping obsolete office stock in the city: "It is the policy of

Dublin City Council: RE20 (i) To promote and facilitate the supply of commercial space, where appropriate, e.g. retail and office including larger floorplates and quantum suitable for indigenous and FDI HQ types uses, as a means of increasing choice and competitiveness, and encouraging indigenous and global HQs to locate in Dublin (ii) to consolidate employment provision in the city by incentivising and facilitating the high quality redevelopment of obsolete office stock in the City."

- **Addition of new section before 9.4.7**

Dublin Chamber welcomes the flexible approach the City Council is taking in section 9.4.6A 'Vacant Lands and Buildings – Interim Solutions' to help tackle the challenges the current economic climate raises. In particular, Dublin Chamber welcomes that "The council will actively engage with landowners / tenants to provide advice and guidance on the requirements for planning permission, recognising that many temporary uses may be exempt from planning permission."

- **Heading 9.4.7 Tourism: Visitors, International Education, Conventions**

Tourism is vital to the Dublin economy so Dublin Chamber welcomes the addition of the new policy: "RE30A To develop appropriate tourism infrastructure, including signage, information, tourism trails, cafes, toilets, public transport, car and coach parking in the main tourist areas, and to facilitate and encourage computerised information points for visitors." However, it is important that a holistic approach is taken right across the Plan and that this policy is reconciled with the new objective SIO33AA which plans to discontinue the practice of allowing coaches to park in the main tourist areas of Mountjoy Square, College Green, Nassau Street, Merrion Square and Wilson Terrace.

Dublin Chamber warmly welcomes the new objective "REO14AA To prepare an Action Plan in consultation with the stakeholders that would optimize the benefits Convention Centre Dublin and bring forward enhanced pedestrian linkages to O'Connell Street etc and also public realm management." It is vitally important to realise this objective as the Plan must strengthen the linkage between the Docklands area and O'Connell Street, the Italian Quarter, Temple Bar and Grafton Street so that tourists, visitors and workers must be able to enjoy leisure activities within relative close proximity to the Convention Centre.

- **Heading 17.6 Building Height in a Sustainable City -**

Dublin Chamber makes the following comments on the proposed amendments to 17.6.1 Areas Identified as Appropriate for High Buildings:

1. Within the Inner City, Dublin Chamber welcomes the increase of office height from 6 to 7 storey but we do not believe this has gone far enough. We do not support the reduction of residential height from 8 storey to 6. Dublin Chamber is of the view that both office and residential height should be 8 storey.
2. Dublin Chamber strongly believes that the proposed amendment to have 6 storey residential / 6 storey office development along existing and proposed mainline, DART and Metro Stations be returned to 1km from the 500m now proposed.
3. Dublin Chamber believes that the proposed amendments to the outer city - where residential storey height has moved from 6 to 4 and overall height reduced from below 19m to below 13/16m - need to be reconsidered. It is

important that the Plan facilitates increased height and promotes density in any area serviced by transport infrastructure/ along key transport corridors.

4. In reference to the addition of the text "For all areas in the Development Plan identified as either mid-rise or high-rise, a Local Area Plan shall be prepared. In high-rise areas, the Local Area Plan shall determine the maximum height of buildings. All areas shall remain low-rise until a Local Area Plan is approved", Dublin Chamber requests that text be inserted requiring that all the Local Area Plans start from the central premise that the agglomeration impact of high density, in terms of sustainability and productivity benefits, is immense and consequently that the LAP facilitates density where appropriate.