



# dublinchamber of commerce

## **Submission on the Draft Dublin City Development Plan 2016 – 2022**

**11 December 2015**

### **Executive Summary**

Dublin Chamber welcomes the opportunity to engage with Dublin City Council in the preparation of the draft Dublin City Development Plan. Similarly, we are delighted to offer our feedback, based on consultation with our 1,300 member companies, across all sectors of the Dublin economy, on the draft. Dublin Chamber's mission is to help businesses succeed in a successful Dublin. The Chamber champions the development and advancement of Dublin from being a good to a great international city. The Chamber has continually emphasised the vital importance of Dublin to Ireland's economy, and called for integrated national and regional planning to support and recognise the role of the capital.

Dublin City Council's Development Plan will shape the future development of not only the city, but the region and nation. Without proper planning, Dublin will not remain competitive and provide sustainable growth and employment. In order to reach its potential and successfully compete with other city regions internationally, greater density and height must be accommodated, particularly between the canals. Greater density and height will markedly increase the returns from investment in infrastructure, and particularly transport. Without significant Exchequer investment in transport, Dublin will become increasingly congested, and lose out to further investment in enterprise. Greater density and height will also assist in the delivery of additional capacity in commercial space, hotels and housing.

Strategic Development Zones offer a way of speeding up the delivery of urgently needed additional commercial space, hotels and housing. In the same way, a number of areas in Dublin city centre offer potential as Strategic Development Regeneration Areas.

## A. General Points

### A Vision for Dublin

#### **The Draft Dublin City Development Plan says...**

*The Vision for Dublin*

*The city must, collectively through its citizens and civic leaders, develop a shared vision of what sort of city we aspire to, not only for the six-year lifetime of a development plan, but for the next 25 to 30 years. [emphasis added]*

#### **Dublin Chamber response**

Dublin Chamber believes that the recommendations contained in the City Development Plan 2016-2022 must be cognisant of longer term vision for the region. The long-term vision for Dublin must be to create a capital that is amongst the top cities in Europe to live, work, visit and in which to start and grow a business.

To achieve this vision, Dublin Chamber believes that the Council must prioritise:

- A knowledge city rich with innovation and entrepreneurial clusters
- A city that works and is easy to operate in
- A city that is well connected by fibre, road, rail, sea and air
- A great European city of culture and diversity
- A highly competitive city through a pro-business environment
- A well governed city
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#### **Requirements for Future Growth**

#### **The Draft City Development Plan says...**

*Development Plan Consistency with the National Spatial Strategy (NSS) & the Regional Planning Guidelines (RPGs). This Development Plan works to a projected population increase of almost 60,000 persons by 2022.*

#### **Dublin Chamber response**

*We must prepare for population growth to significantly exceed the number in the plan.*

Over the past 24 years, the Greater Dublin Area's population has grown 38% from 1.34m to 1.85m today.<sup>1</sup> From a starting point of effectively 100% Irish national, Dublin's population is increasingly multi-cultural (18% today).<sup>2</sup> Between 1999 and 2011 it is estimated that Dublin has added approximately 150,000 jobs, nearly a 30% increase, despite the recent economic contraction. In the twenty years to 2014, Ireland's GDP has more than doubled, reaching €189 billion, with Dublin estimated to account for approximately 40% of that figure.

Traditionally, Dublin and the Mid-East Regions have been net recipients as regards internal migration. This trend reversed sharply in the 2002 and 2006 Censuses, with net outflows of 12,600 and 10,200 people in the years to 2002 and 2006 respectively. However, the 2011 Census then showed a reversion, albeit small to the traditional trend. This reversion is forecast to continue apace over the coming years, combining with international inward migration, and a higher birth-rate than forecast several years ago, to increase the population of the Greater Dublin Area substantially.

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1 CSO.ie, Census 1991 compared to Census 2011

2 CSO.ie, Census 2011

Past development plans have been characterised by serious underestimations of population growth. For example, the Dublin Transportation Office's projections for transport demand in 2016 were reached in 2003.

Many of the issues that present themselves as a result of population and demographic factors are those requiring solutions with long lead-in times. Planning processes, long-term financing, implementation time all contribute to these long lead-in times. Cognisant of the fact that the draft Development Plan covers a seven year period to 2022, Dublin Chamber of Commerce would strongly advocate for the consideration of population projections beyond this time-frame.

The Development Plan must prepare for more people in the city and its surrounding counties, as the GDA population is set to grow to 2.2 million by 2031. Although welcome, growth can mean congestion, high prices and environmental issues as experienced during the previous economic boom. Then, insufficient investment in infrastructure contributed to severe congestion and reduced quality of life in the capital. A repeat of such failure will cost Dublin, and Ireland, business.

It is vital that economic infrastructure is put in place ahead of demand. Dublin is already playing catch-up in this regard, due to significant underinvestment in infrastructure during the economic downturn. Countering this underinvestment will require a dramatic increase in investment to not only compensate for the lost years, but also to allow Dublin to compete on a level playing field with its competitor cities, which already receive two to three times the investment each year.

### **Increased use of SDZs and SDRAs**

Strategic Development Zones (SDZs) offer a way of speeding up the delivery of urgently needed additional commercial space, hotels and housing. For example, the Docklands SDZ has the capacity to yield one million square feet of commercial floor space. The scheme ensures that an office block can be built in around 18 months, once planning is approved. Dublin Chamber believes this process could be even quicker, with planning achievable in 3 to 6 months. SDZs could be created in more areas of the city or throughout the Central Business District.

In the same way, a number of areas in Dublin city centre offer potential as Strategic Development Regeneration Areas (SDRA). An example of this would be the plans for the National Concert Hall Quarter. Dublin Chamber believes that such areas offer the potential to increase the interaction between existing cultural amenities, including under-utilised parks, and their immediate surrounding area.

The Draft offers no plan for an SDZ for the Ballsbridge area. This is strange on a number of counts, including: the potential of the two hotel sites in Ballsbridge; given previous attempts for immense height and scale, and also the fact that the DART – which has spare capacity and is one of the city's best pieces of public transport infrastructure - runs through the area.

It is important that any new zones earmarked for development in Dublin are – or will be – serviced by good public transport. However, it is vital that we get the order of delivery correct. For example, Ballymun has been earmarked as a Strategic Development Zone in the draft, yet the Airport rail link, which will run through Ballymun, is not due to be open until 2027 at the earliest. It would seem logical to ensure that the new rail link, and/or additional/complimentary infrastructure, is in place before we start building units en-masse in the area. Such sensible thinking should be deployed whenever any new mass development is being planned.

## Density and heights

Another fundamental question for Dublin's future development is that of density and building heights. The Chamber has long been an advocate of more dense commercial development in the Central Business District accompanied by the refurbishment of existing stock.

The current height rules provide for developments of 6 or 7 storeys in the inner city and 4 storeys in the rest of the city. Buildings taller than this are permitted if a Local Area Plan or SDZ allows. Dublin Chamber urges the Council to strike an appropriate balance between the needs of potential FDI companies and the wishes of local residents and citizens of Dublin generally.

While all developments above 7 storeys should be carefully considered for their impact on the city skyline, taller buildings can add to and become emblematic of the city, in the same way the Samuel Beckett Bridge has become a symbol of Dublin. This fits with the Council's aim to develop "Dublin's uniqueness in the era of globalisation". Much greater flexibility is needed in terms of height restrictions in cases where the project clearly contributes to the built heritage or boosts the local economy.

Addressing the density issue will also be an important element in addressing the transport concerns of the Development Plan. The Chamber's own research on international trends in transport investment (D21 Transport Report 2012) supported the conclusions drawn from the Department of Transport's paper on "The Regional Development Impacts of Transport Infrastructure: A Literature Review and Policy Implications" by Edgar Morgenroth. It concluded that greater density does indeed increase productivity gains from transport infrastructure.

## B. Specific Policy Areas

This section of the submission will deal with certain specific issues in greater detail.

### 1. Housing

#### **The Draft City Development Plan says...**

Development Plan Consistency with the National Spatial Strategy (NSS) & the Regional Planning Guidelines (RPGs). *Assuming an average occupancy rate of two persons per residential unit, the housing requirement is 29,500 units approximately.*

#### **Dublin Chamber response**

The issue of housing is crucial for native Dubliners and new arrivals alike. The availability and affordability of housing is particularly important for incoming talent. Dublin house prices grew by 29.4% since January 2014, and there has been a 50% drop in availability over the last 3 years, with a vacancy rate in Dublin City of just 10.7%.

The demand for one- and two-person households is forecast to grow significantly in the coming years. If Dublin is to combat urban sprawl and provide good transport infrastructure to a growing population, the Council will need to revise its housing plans favouring, as previously argued, higher density developments. The Council must also look to enshrine even more ambitious sustainability standards in all new housing developments. While Dublin must be quick in addressing its housing supply issues, development should not be hasty. The aim is for energy efficient, long-lasting housing with minimal impact on the environment. Dublin Chamber recommends that as part of the next Development Plan consultation phase that Council seeks to identify the specifics

of such requirements that would maximise the BER ratings or similar environment efficiencies of the next waving of building stock at a cost effective level.

### **Headship rates**

The ESRI published research on household formation as part of their Spring 2014 Quarterly Economic Commentary. As part of this analysis, the headship rate was examined. Population increases drive housing demand, but so do decreases in the size of households as more houses are needed for a given population. The ESRI examined three scenarios:

- Constant headship rates;
- Headship rates based on Censuses 2002 to 2011; and,
- Headship rates based on Censuses 2006 to 2011.

The latter two scenarios, based on the most recent censuses show a marked increase in headship rates, and therefore increasing numbers of households for a given population and increasing demand. Higher estimates predict between 10% and 15% more households than the constant rate scenario by 2029.

This increase in headship rates also suggests the increase in one and two person households, which will naturally require a greater supply of one and two person units for accommodation in the city.

In the calculations prepared in 2.2.1, the decreasing headship rates are only applied to the population growth figures. However, this change does not just impact on the growth figures but means that an additional amount of housing will be necessary to house those living in the city but who will not be living in that household by 2022.

### **Apartment Sizes**

Dublin currently faces a major shortage of rental properties. More apartments and houses need to be built in the city, but those attempting to build properties report that the costs associated with building new units remain too high. One of the reasons cited for bloating costs is the need for all units to be of a certain size.

It is important that any new units built in Dublin are affordable. Affordability is key to stabilising rents and boosting housing supply. A requirement for balconies in apartment blocks adds another increased cost for developers. Also, given, the limited amount of space available in Dublin for new builds, combined with the climate we have in Ireland and the abundance of good public parks and outdoor spaces, it would make sense to opt for an increase in apartment size inside, as opposed to a balcony outside.

## **2. Commercial space**

One of the chief concerns for FDI in Dublin is the availability of prime office space. Last year the take up of commercial space across Dublin was 2.5 million sq. ft., up from 2 million sq. ft. in 2013. Between D2 and D4, only 600,000 sq. ft. is being developed for the next two years, and 40% of this space has already been reserved. There is insufficient commercial space to meet Dublin's ever expanding requirements.

Supply continues to dry up and there will be no new office space delivered in 2015. This means companies seeking to set up offices or establish headquarters in Dublin have very few options from which to choose. Lack of space drives rents higher. If firms opt for a new development, they can be faced with a three year wait due to a lengthy and inflexible planning process. For most, this delay is unacceptable and companies choose to move elsewhere. Dublin is already losing out to competitor cities because of this issue.

### **3. Movement and transport**

In the coming years, population growth will place excessive demand on critical pieces of infrastructure, particularly transport. The city is concerned with two categories of transport journey: intra-city movements, and movements into and out of the city. These journeys are made by two key demographics: commuters (e.g. workers, students, etc.) and visitors (e.g. shoppers, tourists, etc.). Total trips into and out of Dublin's canal cordon are still below prior peak levels, but the Chamber believes these levels will climb quickly. The challenge will be to address the increasing volume loads in each mode and support the most sustainable modes. However, in pursuing this goal the Council must consider the businesses that rely on shoppers and tourists coming into the city.

#### **Prioritisation**

The high proportion of private car transport for commuting to work remains an issue. The Council must ensure that public transport (or alternatively walking/cycling) is a viable and preferable alternative to the private car. Equally, Dublin Chamber believes it important to note that car-based shoppers, diners, tourists, concert and theatre goers are a critical component of Dublin city's ecology and economy. Failing to acknowledge the role that private vehicles play in the life of the Dublin City Region will be detrimental to the retail, leisure and tourism sectors, and could lead to Dublin city becoming a 'donut' city with an empty city centre.

#### **Road Infrastructure**

Poor vehicle access, vehicle circulation and congestion continue to be matters of concern for businesses in the Dublin region. Dublin Chamber believes the following measures should be considered to address these concerns.

The East Link Bridge continues to operate under capacity. More must be done to encourage increased use of the East Link, such as incentivised tolling for drivers who use both the Port Tunnel and the East Link. Dublin Chamber would welcome confirmation from Dublin City Council on its plans for the East Link Bridge when it reverts to the city's ownership next year. Additionally, Dublin Chamber supports proposals for a bridge to connect Sir John Rogerson Quay to East Link that would be open to private vehicle traffic as this would be a significant resource for South Docks companies needing access to Dublin Airport.

The Port Tunnel is severely underutilised and measures to encourage greater car usage, such as toll reductions and the extension of the Port Tunnel under the Liffey to improve access to the south Docklands, should be considered.

Finally, the long term development of Dublin City Centre requires that additional capacity-generating measures should be considered, such as the completion of the M50 ring road with the overall construction of the Eastern Bypass.

#### **Public Transport**

The Council should continue to support the development of public transport in Dublin by supporting greater density and height, as this improves the economic returns to investment in public transport. Furthermore, the Council must support the development and enhancement of Dublin and Ireland's air and sea port access to ensure that customer experience and service is world-class.

Unless we put transport infrastructure first in the Dublin region, we are potentially creating more and more bottle necks. The lack of high quality and high capacity rail is one of the biggest inhibitors to growth in the city. As a solution, we should look to make maximum use of the existing infrastructure we have. For example, we should look to build and increase densities along the Dart line. Opportunities for growth are presented

along the new Luas Cross City line, which will come on stream in 2017. The same can be said for the whole of the Dart line from Booterstown and Sandymount on the southside, to Fairview and Killester on the northside, including the original plans to build around and over key city centre rail stations such as Tara Street. The heights allowed in along key public transport lines should be more ambitious. Why would we continue to ignore the potential for higher densities all along this critical but working artery of the city?

### **Businesses Must Be Consulted on Changes**

Dublin Chamber believes no amendments should be made to the current traffic patterns within the city centre without extensive and open consultation and engagement with the business community. This should take place prior to any plan being put forward for consideration. This unfortunately was not the case with the Dublin City Centre Traffic Plan, which, mainly due to a lack of consultation with key players in the city, resulted in a considerable amount of criticism for the draft when it was published. The result is that a greater amount of revision is required to the plan than could have been the case.

### **Integration and Accessibility**

The successful introduction of the Leap card has produced greater efficiencies in public transport travel and enhanced user experience. Going forward, further payment integration is required on all facets of transport including Dublin Bikes, car parks and park and ride facilities and tolls. Dublin Chamber would like to see technology further embraced to include the use of contactless bank cards and/or mobile phones for payment of public transport journeys. It is now four years since the Leap Card was introduced. Dublin Chamber contends that progress in terms of expanding Leap, and also other similar schemes, has been too slow. Improving and expanding the Leap scheme will be key in enticing more people to use public transport and schemes such as Dublin Bikes.

## **4. Tourism**

The Draft Development Plan proposes tourism as one of the key economic pillars of the city's economy, and seeks to support the provision of significant increase in facilities such as hotels, aparthotels, tourist hostels, cafes and restaurants, visitor attractions, including those for children.

Dublin Chamber and its member companies were deeply worried when it seemed that focus on Dublin's tourism offering was lacking at both a national and local level. The development of a convincing long-term strategy for tourism in the Dublin Region, as compelling as the strategic clarity of Harvest 2020 in the food and agriculture sector, is now underway through the work of completed by the Grow Dublin Taskforce and now underway in the Grow Dublin Tourism Alliance.

The Development Plan must enshrine a tourist proposition that is in-keeping with the new 'A Breath of Fresh Air' initiative which was launched in October 2015, and places Dublin in the national context as "the vibrant capital city bursting with a variety of surprising experiences – where city living thrives side by side with the natural outdoors." Dublin competes with cities overseas to attract visitors.

### **Hotels**

Dublin is experiencing a major shortage in hotel rooms. There are currently around 19,000 hotel rooms in Dublin city. A report published by JLL in November 2015 indicates that there is an urgent need for an additional 3,000 rooms in the city to satisfy demand. Fewer than 300 additional rooms set to come on stream by the end of 2016.

A failure to address this supply shortfall could have a significant negative impact on the Irish economy. Dublin has been named by Lonely Planet as the third best city to visit in

2016. However, a lack of supply - particularly at key times of the year, i.e. summer and around big events – puts Dublin’s attractiveness at risk.

Occupancy rates in Dublin in the first ten months of 2015 were 84% (up 4.6% year on year). The average cost of a hotel room in the capital over the same period increased by 17%.

Barriers to building hotels include a shortage of suitable development sites, lengthy planning processes, and a lack of competitive development finance.

Dublin Chamber believes that the number of hotel beds available in the city needs to be increased significantly as current levels are preventing the city from attracting international events of the size that Dublin is capable of hosting. Current demand for hotel rooms indicates the need for 10 new hotels with only 4 in planning stage at the moment.

Given the world class infrastructural and service offering we have at our disposal, Dublin should aspire to become a leading destination for event tourism. An emphasis should be placed on maximising the use of our stadiums and venues at key times of the year. For example, the lack of a major festival in Dublin during the summer months, when attention is focused on Galway, Tralee and Kilkenny for other major festivals, is a loss to the city. Major events such as concerts are a good way in which Dublin can counter this problem.

Large venues such as Croke Park, the RDS and Aviva Stadium are expensive to run and it is important that they are utilised. Dublin Chamber would like to see the current three concert limit at both venues removed. One possibility would be to put limits in place on the number of consecutive nights that concerts can take place. For example, where the total number of concerts is four or more, a break of at least one night could be taken after the second concert. Consideration should also be given to establishing windows during which concerts can be hosted. This would mean that the same areas of the city are not repeatedly burdened by events/concerts in a short period of time.

To support and help remedy the reputational damage that Dublin events suffered in 2014, it would be beneficial if a traffic light system were put in place which would require an agreement in principle regarding the awarding of a licence before tickets are sold. A traffic light system would allow for an event licence to be agreed in principle, with the option for certain details to be finalised between the date of tickets going on sale and the event itself. It is imperative that the licencing system should provide any ticket buyer with reasonable confidence that the event will go ahead. When any decision on licencing is made, the promoter must be allowed the right of appeal.

### **Foodscape**

Cafés, restaurants, markets and food trucks are growing rapidly in cities across the world. Food tourism is a high growth area, and a key element in improving Dublin’s offering for incoming visitors and talent. Indeed, a thriving food sector improves the quality of life for native Dubliners: the Council’s 2012 Your Dublin Your Voice survey suggested that eating out ranks higher than shopping on the list of top favourite things to do in the city centre. The presence of good restaurants can also be a deciding factor in consumers’ choice of where to shop.

It is clear, then, that the quality of Dublin’s ‘foodscape’ has major implications for the city economy. Good planning can help ensure an excellent offering.

Restaurants within an area should vary in terms of price and style, such that viable businesses are not competing unnecessarily due simply to proximity. The Council should encourage outdoor seating areas, which are a big pull for cafés and restaurants and add

to the quality of street life in the city. Where a street has sufficient space for multiple outdoor seating areas, the Council should look at opportunities for pedestrianisation.

Eating places and food markets often use and promote local or Irish produce and can play a role in regenerating areas. As previously discussed, the Iveagh Markets redevelopment is a welcome example of the type of project that the Council should encourage. However, it should be acknowledged that most of the markets in and around Dublin cater for lunch and are therefore in direct competition with brick and mortar (B&M) locations. Given that food market operators have fewer overheads compared with B&M locations, there is an argument for these markets to pay a portion of commercial rates to the city, and relieve some of the burden on B&M locations which create more employment.

More and more, cafés, restaurants and bars have assumed the role of meeting places and mobile offices for businesses, students, study groups and creatives. Their role in promoting entrepreneurial culture can be enhanced: plenty of space, Wi-Fi, private seating areas and plug outlets can all help to encourage innovation. Dublin Chamber members are also in favour of later opening hours for cafés, which would allow for an alternative after-work meeting place to the pub.

The potential of the craft brewing and distilling sector cannot be underestimated. Three breweries have been proposed for the Liberties and craft beer alone is expected to attract 50,000 to 100,000 visitors a year, with fairs and festivals further boosting the economy. The Council should aim to support this high-growth, indigenous sector and promote Dublin as a destination for craft brewing and distilling.

## **5. Community infrastructure and social inclusion**

The Council must do more to tackle homelessness. The Chamber supports the approach expressed by the Peter McVerry Trust and Focus Ireland of community-based services. Centralisation, while perhaps cost efficient for Government, is less effective for the individuals. A series of small housing developments across different parts of the city would be a step towards solving the issue. Such developments would ideally have mixed tenure residents and high intensity supports.

Furthermore, it is well-established that the issues of homelessness and drug abuse are interconnected in many cases. The vital services offered by the Council and Dublin charities (such as needle exchange programmes, drug treatment centres, homeless shelters etc.) should be community based and dotted across the city. When a single area is associated with drug issues, it often becomes a 'no-go zone' for locals and tourists. The objective of a thriving city centre should be at the heart of this Development Plan. Visitors, locals and city centre workers must feel safe, and families should be encouraged to live in the city centre, while ensuring that those with great need for supports are given them in the way that is mostly likely to help them even if that costs a little more.

## **6. Health and Hospitals**

### **Draft Development Plan says...**

*To recognise that hospitals and the wider healthcare sector are crucial to the wellbeing of the city, including as major sources of employment, economic development and innovation; and to promote and facilitate their development and expansion.*

### **Dublin Chamber Response**

It is perhaps one of the great failures of the current Development Plan that the Children's Hospital scheduled to be built at the Mater site failed to meet the approval of

An Bórd Pleanála. As a business representative organisation, Dublin Chamber has always been aware that shortcomings in the planning process can impact on individual businesses, investment and job creation. However in this instance, system failure has severely delayed the building of a hospital with the capacity to better treat Ireland's sick children.

The Development Plan must give priority to these key pieces of social infrastructure, on which Dublin and Ireland depends. This should include the aforementioned point regarding density and height.

Therefore, the Chamber asks that the Development Plan give particular reference to:

- The Children's Hospital at James Hospital
- The new Maternity hospital at St Vincent's which is the merger of Holles St and St Vincent's
- The relocation of the Rotunda possibly to the Blanchardstown
- The relocation of the Coombe women's hospital Blanchardstown

### **Children's Hospital**

Dublin Chamber of Commerce wished to strongly endorse the building of the New Children's Hospital at the St James's Hospital site. This project will provide a crucial piece of social infrastructure, which will provide better healthcare to the children of Ireland.

The New Childrens' Hospital will serve as the local childrens' hospital for the Greater Dublin Area, which has a population of over four hundred thousand children under the age of fifteen. Within the state, for which the hospital would serve as the specialised childrens' hospital, the population of those under fifteen is over one million. Medical studies have shown that experience and a higher volume of procedures reduces mortality rates. The Royal College of Physicians first proposed the construction of a new National Children's hospital in 1993. This hospital would significantly increase the number of beds available for children and improve the overall care they would receive.

Locating the New Children's Hospital at the St. James' campus offers several advantages to better treat the sick children of Ireland. At thirty-nine, the number of specialities available in St. James' Hospital is among the highest in the country, and will help in the treatment of the most seriously ill children. Locating the new children's hospital at St. James' campus, an already mature teaching hospital, will also facilitate excellent teaching of the practice of paediatric medicine and research..

Construction of the hospital will take approximately five years. During this time, over a thousand jobs will be created. After construction, the New Childrens' Hospital will also generate ancillary jobs in the development of healthcare technology, offering a boost to the adjacent Digital Hub. Further, the increase in the size of the hospital campus will also serve as a boost to the development of a medical cluster. We believe the cluster will support development of advanced healthcare technologies and foster intellectual capability. This has been the experience in other cities internationally and Dublin 8 is well positioned for this type of business development.

The development of the New Children's Hospital at the St. James' campus is a crucial piece of social infrastructure that will aid in the better treatment of Ireland's children.

## **7. Entrepreneurial and startup environment**

The approval of the SDZ Docklands Planning Scheme (North Lotts and Grand Canal Dock 2014) is critical for Dublin as a global startup city and for the development of innovation

clusters across the city. Dublin Chamber recommends that the SDZ be protected and expanded in the Development Plan.

It is generally acknowledged that there is a strong economic rationale for the promotion of clusters through planning policy. If Dublin is to become “Europe’s most adaptable smart city” (Innovation Dublin; Creative Dublin Alliance), the city needs to position itself as one of the best places in the world for startups.

### **Connecting the Docklands**

Dublin Chamber recommends that a variety of employment uses from large scale FDI to startup units should be encouraged, and that there should be a variety of tenures available including short term and temporary.

A new pedestrian bridge is being designed to span the river between the northside and Grand Canal Dock at Forbes Street. This is one of three new bridges planned for the next four years. Dublin Chamber believes that more links across the river are important to increasing the popularity of the Docklands area as a place to locate - for both businesses and residents – and to furthering the potential for clustering. Funding must be allocated to bring the planned bridges to fruition.

The new bridge at Forbes Street will provide a more direct pedestrian link from the northside to the Grand Canal Docks and will relieve pressure on the Beckett bridge. The Samuel Beckett Bridge is extremely busy, particularly at rush hour times, and this new bridge will stop it from moving into over-capacity.

Longer travel times between firms mean the proximity advantage is diminished, leading to a more divided cluster. The Docklands’ startup area should be better linked to the city’s other clusters through walking, bike, public transport etc. For example, the Council should analyse the proximity of Dublinbike stations to startup clusters in the Liberties and Grangegorman.

Dublin Chamber recommends that when the Development Plan is adopted, Development Management and Forward Planners within Dublin City Council should be aware of all cluster development currently underway, for example in technology companies. There is scope to share views, knowledge and expertise on the formation of clusters and learn from existing successful clusters. To support this activity, the Chamber recommends that the Commissioner for Startups role be recognised as a facilitator and supporter for such work.

### **Sustainable environment and infrastructure**

The upgrading and improvement of the transmission networks for energy, broadband, etc. will be an important determining factor in the physical competitiveness of the city. The Development Plan should ensure that provision of such service utilities are recognised as vital for attracting foreign direct investment and promoting domestic growth which help to create and retain jobs.

### **Telecommunications**

The Development Plan should recognise the critical importance of advanced telecommunications (i.e. Next Generation Networks) with the objective of reducing the significant cost associated with major trenching work. The Chamber believes that Dublin’s competitiveness in this area is assessed across four criteria:

- Access – particularly where less commercially viable
- Speed
- Quality – poor quality (e.g. high latency) impacts on headline speed and ability to run cloud based applications
- Price

The City Council and the other three Dublin local authorities must aim to better coordinate requests for maintenance. Creating a clear, cohesive, and efficient process for development and maintenance will reduce bureaucratic costs and increase productive investment in a NGN.

The Development Plan should ensure that all future Housing, Apartment and Office stock is ducted for telecommunications. An important part of being Next Generation Network-enabled is having the necessary ducting in place so that homes can access the network. The marginal cost of laying down this fibre during construction is significantly lower than the cost of retrofitting it. Given the rate at which housing stock grew in Dublin during the 2000s, Dublin has missed an incredible opportunity to plan for the future by catering for high speed and quality connectivity. Dublin Chamber believes the Development Plan should ensure that no new dwelling is built in City Council area without the capability to integrate into any advances in the telecommunication network.

## **8. Waste**

During the process of consultation with the Chamber membership on the Development Plan, some members have expressed concern at the competition in waste service provision in the city. The standard model in cities across the world is the development of a public tender for waste services which are then managed in different areas by franchises.

Dublin Chamber recommends that Dublin City Council should as part of the second consultation period seek submissions on developing such a tender process in order to ensure waste services are delivered efficiently and equally in all areas, with no interruption or duplication of services. Quality standards are essential, and should include customer charters and properly authorised, insured, regulated collectors with a proven track record. Furthermore, the existence of franchises responsible for the different areas would reduce the cost of collection and the number of waste vehicles on city roadways.

Competition should also be based on the recovery rate performance and the performance of the collector in educating consumers in waste prevention. The Council could encourage collectors to offer information and advice on what and how to recycle, with hotline services for once-off waste issues. Regulation and enforcement must play a role in ensuring all customers have bins and are managing and accounting for their waste.

In keeping with the Council's objective to reduce waste, the Council could consider collection fees based on the weight of waste going to landfill (grey and black bins), with recycled and compost (green and brown bins) being collected free. More provision should be made for 'special' waste collection of electronics, clothing, bedding and furniture etc., increasing the number of special collection points. This is something the Chamber could support through our member companies, as several large businesses already run similar programmes.

## **9. Retailing**

Dublin Chamber believes that the Development Plan must be cognisant of the importance of retail to Dublin city centre. As noted in the above section on Transport and Movement, failing to acknowledge the role that private vehicles play in bringing shoppers to the city centre will be detrimental to this core. Dublin City is the prime retail destination in the region and the state, and could lead to Dublin becoming a doughnut city with an empty city centre.

The Chamber notes the push to restrict and slow down traffic within the city centre, to give increased levels of priority for pedestrians, cyclists and public transport. However,

people coming into the city by car remain a critical component of the city centre, and include shoppers, diners, tourists and event-goers. Minimising the volume of through traffic will help reduce unnecessary private vehicles and those most likely to be concerned with speeding through the city centre. Doing so will help to create a positive pedestrian environment, which is important for those enjoying the Dublin's retail experience.

Dublin Chamber believes that any perception of inconvenience – in terms of restrictions and disruptions – will simply result in individuals selecting alternative locations to shop and spend their money, as opposed to encouraging people to switch 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.

The Development Plan should be to support vibrant and welcoming city centre retail core that is easy to access and pleasant to experience. The Chamber recognises that this will require major periods of construction to achieve but even in such cases the Development Plan must be clear that these activities are planned such that the city remains 'open for business'.

The availability of parking facilities remains vital to the city centre. It is important that adequate parking is provided for people travelling into the city centre on both leisure and business. Consideration must also be given to the cost of parking, given that retailers and service providers in the city centre are competing with an increasingly competitive shopping/leisure/restaurant offering in the suburbs.

### **The Retail Make-up of Dublin City Centre**

Dublin city centre lacks sufficient supermarkets capable of providing for the weekly shopping needs of residents. As a result, residents are not afforded the same level of competition that is available at suburban locations who offer better parking facilities (the average weekly 'shop' weighs approximately 35kg). The end result is that those with access to a car will travel outside the catchment area for their shopping needs, while those without a car may have to pay higher prices in local stores where there is less competition.

This Development Plan must address the insufficient number of suitable retail sites available. Strategically important lands are being used for office or residential development, and DCC should consider introducing minimum net retail trading areas to be provided in Planning Applications, particularly on selected 'Key Redevelopment Sites'. Furthermore, this development plan must consider the following requirements (inter alia) of convenience operators:

- Proximity to road infrastructure is a significant determinant of whether a large retail store will be successful;
- Suitably-sized sites that are capable of accommodating a large retail format and an adequate quantum of floor-space;
- Convenience floor-space requires sufficient car parking spaces for normal trading and at peak times (such as Christmas and Bank Holidays) and to avoid queuing or 'space searching'. The failure to provide such spaces will result in the loss of expenditure in Dublin City Centre or surrounding District Centres as consumers feel that the 'convenience' element has been lost;
- Service access needs to be free flowing. If access is difficult or deliveries are restricted, convenience stores may not be able to satisfy consumer needs.

Dublin city centre remains the chosen area in which to hold demonstrations. Currently, any parties or organisations that wish to protest in the city centre are free to do so wherever and whenever they wish. The result of this is that the city centre is regularly brought to a standstill for long periods by protestors.

Dublin Chamber respects people's right to protest, but would like to see a solution that would allow large-scale protests without the city centre having to be brought to a standstill. Roads being closed off due to protests ultimately creates problems for workers, consumers and tourists, detracting massively from the appeal of Dublin as a place to work, visit, shop and to do business. For example, the water charges protest in mid-December 2014 resulted in retail businesses in the city centre losing up to 60% of trade, while the commute out of the city for workers took several hours. Protests can also greatly hinder people looking to come into the city centre for concerts and events.

Dublin Chamber would like to see a system in place that would allow people to exercise their right to protest, while at the same time ensuring minimum disruption for users of the city. This can be achieved by looking at best practice in other cities around the world.

## **C. Conclusion**

Dublin Chamber is highly optimistic for Dublin's future. The city has transformed itself in a short space of time from a small capital to a city region that competes on the global stage. Dublin is still growing and has the potential to achieve even greater things.

The above recommendations are designed to tap into that potential and consolidate Dublin's position as a great place to live, work, and visit.