



## **Response to Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022**

**Name:** Dublin Chamber of Commerce.

**Address:** 7 Clare Street, Dublin 2.

**Organisation:** Dublin Chamber of Commerce.

### **Preface**

This response to the draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022 builds upon Dublin Chamber's initial submission of March 2009. Dublin Chamber calls for the Regional Planning Guidelines to take account of the views expressed by Dublin Chamber on the Dublin City draft Development Plan 2011-2017.

## **1. Building a competitive Dublin City Region to 2022 and beyond**

### **1.1 Long term planning is essential**

The business community in the Dublin City Region<sup>1</sup> and Greater Dublin Area has experienced major upheaval, and faced many challenges, during the economic turmoil of the past eighteen months. A reflective period is now required for the built environment to settle down following the building boom.

Dublin Chamber believes that the Regional Planning Guidelines (RPGs) and the Development Plans of the four Dublin local authorities must creatively and proactively respond to the new commercial and economic environment in which the Dublin City Region finds itself and look further than their suggested terms out to 2030 and beyond so that competitiveness can be restored and developed.

Overall, the longer term focus of the Regional Planning Guidelines out to 2022 is welcome, as indeed is the aim to ensure "the GDA by 2022 is an economically vibrant, active and sustainable international Gateway Region, with strong connectivity across the GDA Region, nationally and worldwide." However it is imperative that all the Plans for the Dublin City Region, including the RPGs, are not simply strong on positive rhetoric, but rather that they outline long term practical action plans that can be delivered to positively shape the Dublin City Region and Greater Dublin Area.

Agreed actions are needed across the County Dublin local authorities to support jobs and local entrepreneurs with approved budgets to deliver targeted measures.

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<sup>1</sup> The Dublin City Region refers to the County Dublin region.

## **1.2 Meaningful integrated regional planning is essential**

Many of the issues which negatively impact on the Dublin City Region's competitiveness - including a lack of an integrated transport network; mismatched land use and planning; a lack of appropriate height and density in key commercial areas etc. - must be tackled at a strategic regional level if the Dublin City Region is to restore its competitiveness and compete successfully as an international City Region.

Dublin Chamber believes there is a need of an over-arching strategy that positions the Dublin City Region as one of the most competitive city region globally, and to facilitate productive sustainable investment. If this objective is met then many of the secondary ambitions of the Greater Dublin Area will be met more easily and within a shorter time frame.

The RPGs should therefore set out all the known competitiveness deficits (identified by the National Competitiveness Council) and systematically identify how and by whom these will be addressed in the short to medium term. In addition, the RPGs should take as a starting point the Forfas report, 'Cities as Drivers of National Competitiveness', and having listed all the elements that cities need to thrive, systematically identify how and whom these will be addressed in the short to medium term.

In outlining the context in chapter one, the draft RPGs highlight the extensive range of policies and strategies that development plans for the region must take account of including:

- ❖ The Planning and Development Act, 2000;
- ❖ The Planning & Development (Amendment) Bill 2009;
- ❖ The National Development Plan;
- ❖ The National Spatial Strategy;
- ❖ Smarter Travel and Transport 21;
- ❖ The National Climate Change Strategy;
- ❖ The National Energy Efficiency Action Plan;
- ❖ The National Biodiversity Plan;
- ❖ The National Heritage Plan;
- ❖ The National Anti-Poverty Strategy;
- ❖ The National Action Plan for Social Inclusion;
- ❖ River Basin Management Plans;
- ❖ Regional Waste Management Plans;
- ❖ EU Directives including the Water Framework Directive, the Floods Directive, the Habitats Directive and the Strategic Environmental Assessment Directive; and
- ❖ Guidance Documents on:
  - ❖ Retail Planning Guidelines
  - ❖ Sustainable Residential Development in Urban Areas
  - ❖ Telecommunications Antennae and Support Structures
  - ❖ Wind Energy Development
  - ❖ The Planning System and Flood Risk Management.
  - ❖ Architectural Heritage Protection
  - ❖ Framework and Principles for the Protection of Archaeological Heritage
  - ❖ Implementing Regional Planning Guidelines-Best Practice Guidance
  - ❖ Best Practice Urban Design Manual 1 & 2
  - ❖ Childcare Facilities Guidelines
  - ❖ Design Standards for New Apartments
  - ❖ Landscape & Landscape Assessment
  - ❖ Provision of Schools and the Planning System
  - ❖ Quarries and Ancillary Activities
  - ❖ Sustainable Rural Housing

Dublin Chamber believes that the Dublin City Region needs a single core integrated, coordinated and coherent Development Plan, not an array of partially coordinated and often contradictory plans, legislation and policy recommendations if it is to be supported in "its role as the key driver within the national economy" and if the core principles for the 2010-2022 RPGs are to be realised:

- “• Dublin as the capital city of Ireland and a major European centre shall grow and progress, competing with other cities in the EU, and serving a wide range of international, national, regional and local needs.
- The Dublin and Mid-East Regions will be attractive, vibrant locations for industry, commerce, recreation and tourism and will be a major focus for economic growth within the Country.
- The GDA, through its ports and airport connections will continue to be the most important entry/exit point for the country as a whole, and as a Gateway between the European Union and the rest of the World. Access to and through the GDA will continue to be a matter of national importance.”

The vast array of existing plans must be consolidated so that engagement with stakeholders across the City Region is meaningful, and development occurs in a connected and timely manner. Indeed, Dublin Chamber believes the Dublin City Development Plan for the next seven years must be drafted in the context of finalised Regional Planning Guidelines. It is incredulous that the draft RPGs for the Greater Dublin Area 2010-2022, whose function is to set the basis for the Development Plan for the region, are out for consultation simultaneously with the draft Dublin City Development Plan.

Finally, given that the planning context for the RPGs is based on the current National Climate Change Strategy, which is out-of date having regard to the EU’s decisions of December 2008 on climate change and renewable energy, a separate section of the RPGs should describe how the region’s public bodies, businesses and households will have to respond and move to a low-carbon economy.

### **1.3 Mayor for Dublin & the National Transport Authority**

Dublin Chamber recognises the potential positive benefits that the introduction of a directly elected Mayor for Dublin will have on developing and overseeing policy for the Dublin City Region in land-use planning, housing, waste management, and water services, and the strong role this office will also have in transport and traffic management.

Dublin Chamber welcomes the recognition in the draft RPGs that "strong leadership and effective governance mechanisms are an integral part of achieving competitive regions" and that "the proposed introduction of a directly elected mayor for Dublin by 2011 presents an opportunity to strengthen leadership structures and enhance co-ordination in the development of the metropolitan area." The next stage of development of the Regional Planning Guidelines must give full recognition to the detail of the published legislation, *Local Government (Dublin Mayor and Regional Authority) Bill 2010*. And as one of the powers the directly elected Mayor will have - the preparation of RPGs - this document should not be formally adopted, but presented to the new Mayor as work in progress.

Furthermore, the next version of the RPGs must assess, and where appropriate include, the recommendations of the transport strategy for the Dublin City Region that the newly established National Transport Authority is working on.

## **2. Transport Development & Infrastructure**

The Dublin City Region will require significant investment in its infrastructure to make the region a better place to work, rest and play. The infrastructure needs of the Dublin City Region and the Greater Dublin Area GDA beyond 2022 should be assessed now, given the long lead time to get projects built. Such a study should be included in the next version of the RPGs, and contain assumptions about the ability of the local authorities to finance the many projects which are identified.

### **2.1 Height and Density**

When the DART Underground and Metro North projects are delivered, the landscape of the Dublin City Region will be entirely different. It is of the utmost importance that all Development Plans for the region maximise the potential of these projects by facilitating increased height and promoting density along key transport corridors, including LUAS lines.

Dublin Chamber welcomes the recognition in the draft RPGs that there is a need to promote "higher densities for employment uses around public transport."

## **2.2 Road Transport Development**

In relation to the Eastern Bypass, Dublin Chamber welcomes the recognition in the draft RPGs that this project has long term possible strategic importance in terms of meeting future transport needs and economic growth, and that until the Eastern Bypass and the Leinster Outer Orbital Route "are examined in detail and considered in relation to the impact of such projects on the environment and protected habitats, and clarity regarding their suitability or viability of more suitable alternatives are identified, in the interim, it is recommended the various relevant Local and Transport Authorities liaise to ensure suitable lands are reserved to allow for the possible future delivery of these transport infrastructure projects in the form outlined in the studies completed."

## **2.3 Dublin Airport**

Dublin Chamber welcomes the recognition in the draft RPGs that "aviation and air transport are essential to economic trade, international competitiveness and movement of people. The GDA has the unique asset of Dublin Airport which is a primary international air access point for the State."

Dublin Chamber supports the recommendation that "relevant Local Authorities should include provisions and zoning policies which support the delivery of high quality transport links to Dublin Airport; ensure that suitable lands are appropriately zoned to allow future expansion and restrict (and where appropriate, prohibit) development in public safety zones and approach zones of all GDA airports and airfields, and noise zones associated with airport flight operations."

## **2.4 Dublin Port**

It is recognised that Ireland's economic recovery will be export led and in that context having accessible, well-connected Port facilities is a national imperative. Dublin Chamber welcomes the acknowledgement of the findings of Indecon's 'Dublin Port National Development Plan Study' in the draft RPGs that "nothing should be done at a policy level to block either the proposed expansion of Dublin Port or the proposed development of Bremore at this stage".

Finally, the recognition given to the important role the freight industry plays in supporting the economic performance of the region through the movement of goods and services in the draft RPGs is welcomed by Dublin Chamber. Dublin Chamber supports the recommendation that " a menu of options should be explored by transport operators, local authorities and freight industries- including improved transport linkages between airports/ports and logistics, increased emphasis on sustainable rail, sea, and inland waterway freight, priority freight routes, use of more efficient technologies in freight vehicles, timetabling and scheduling to avoid peak use of traffic networks, joint ventures/pilot schemes between transport infrastructure operators, freight companies and businesses, and consideration of freight planning in Local Area Plans."

## **3. Other Observations**

Given the Exchequer's financial difficulties, the RPGs should set out, based on evidenced-based evaluation criteria, a set of revised spending priorities. As the draft RPGs are predicated on ESRI medium economic forecasts it would be prudent for the RPG to develop at least two economic scenarios (low growth/modest (less than 4% per annum) growth) and describe the consequences for investment and the RPG's other strategies under both.

The draft RPG makes no reference to NAMA and the availability of perhaps 200,000 vacant housing units in the GDA. Instead a high priority is attached to a settlement strategy which in the current climate needs a radical review to make more realistic working assumptions about the supply and location of social and affordable housing.

The RPG suggests that practically every town and location in the GDA has proven prospects and capacity to become a 'Core Economic Area'. Again, against the backdrop of NAMA this is unrealistic. The spatial strategy must take account of the property developments under construction but abandoned, those where planning has been approved, and most importantly the developments which NAMA will finance to allow completion. For example, there is a significant surplus of retail and commercial property in the GDA so until a new equilibrium is found the ambitions for Core Economic Areas should be assessed more rigorously by way of master plans.

Dublin Chamber believes the next version of the RPGs must be stronger on the potential of the green economy, and the initiatives which the Dublin City Region should be taking to exploit these prospects.

KPIs and well-established quantitative city indicators should be included, including the Siemens index.