

NORTH LOTTS AND GRAND CANAL DOCKS

STRATEGIC DEVELOPMENT ZONE

DRAFT PLANNING SCHEME

If you have any comments on the above proposal, please include them in the space provided below.

Name: Dublin Chamber of Commerce
Address: 7, Clare Street, Dublin 2

Comments:

Dublin Chamber of Commerce welcomes the opportunity to input into the North Lotts & Grand Canal Dock Strategic Development Zone (SDZ) Draft Planning Scheme.

Dublin Chamber believes that the creation of an SDZ for this particular area of Dublin City provides an important opportunity to encourage tourism, increase the level of foreign direct investment and promote further economic development.

Furthermore, we view the decision to assign Dublin City Council with responsibility for the Docklands area as an opportunity to expand on the positive achievements of the Dublin Docklands Development Authority and the Custom House Docks Development Authority.

Dublin Chamber has been, and remains committed to proactively working with Dublin City Council in the development of the greater Docklands area.

The following submission outlines a number of key issues that are of particular importance to the successful regeneration of Dublin's Docklands.

1. Access/Congestion

The Luas Red Line extension to the Point Village and the opening of the Irish Rail Docklands station have greatly improved public transport access to the Docklands area in recent years.

However, poor vehicle access, vehicle circulation and congestion continue to be matters of grave concern for businesses in the area. This is of particular importance to major multinational firms who have chosen the Docklands area as their strategic base. They require an efficient and timely circulation system for visiting colleagues, clients and potential investors.

Through Dublin Chamber's 'Docklands Traffic Forum', comprising of businesses in the area, a number of issues and proposals that require urgent attention have been outlined, including:

- Poor southbound access to commercial premises on Sir John Rogerson's Quay(SJRQ);
- Traffic congestion from Cardiff Lane to SJRQ;
- Potholes/poor road conditions;
- Proposal to construct a bridge across the mouth of the Liffey between Britain Quay and York road;

- Proposal to reintroduce the Liffey Ferry boat at the East End of SJRQ to link up with the 02;
- Proposal to introduce a permanent Taxi Rank at East End of SJRQ in conjunction with the removal of the illegal Taxi Rank located at the corner of the State Street office on SJRQ;
- Proposal to improve the bus service to the Grand Canal Dock location; and
- Proposal for a procedure to undertake proactive access and safety measures in the event of adverse weather conditions, particularly snowfalls.

In addition, a number of other measures should be considered. Measures to increase the capacity and use of the East Link Bridge are necessary, including the construction of additional lanes and the reduction of toll charges. 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 the City Centre and Docklands area requires that additional capacity generating (and possibly flood prevention) measures should be considered, such as the completion of the M50 ring road with the overall construction of the Eastern Bypass.

The Draft Planning Scheme states that the SDZ provides for large scale Foreign Direct Investment. Dublin Chamber is concerned that additional development, without resolving the current access, circulation and congestion issues, will act as a severe deterrent to all existing and future business investment in the area.

2. Clusters

The acknowledgement in the Draft Planning Scheme of Dublin as a global start-up city and the SDZ Scheme's active promotion of cluster development is critical. 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 to be one of the best places in the world for start-ups.

To support the emergence of clustering in the Docklands it is important that the density of commercial developments in the Docklands area is increased. The agglomeration impact of high density, in terms of sustainability and productivity benefits, is immense, including:

- Less urban sprawl means less need to use greenfield sites;
- Better use of public transport;
- Increased specialisation in businesses resulting in improved efficiency and expertise;
- Knowledge spill over between firms in the same sector, and across sectors, leading to
- Increased innovation;
- Increased competition which can spur on innovation; and
- Increased labour pool with a wide range of skills and expertise.

3. Development Contributions

It is essential that any development contribution scheme in the SDZ area does not encumber potential development. Dublin Chamber is concerned about the lack of clarity in the draft Planning Scheme about a development contribution scheme. To incentivise

developers to invest in the SDZ area, we believe that the feasibility of a moratorium on development contributions for a period of time should be actively considered.

4. Tourism

The Dublin tourism industry has seen a small but steady recovery over the past two years. The number of overseas visitors to the City is still down significantly on pre-2009 levels. The Docklands area is an important part of the tourism offering provided to visitors coming to Dublin. It is important however, that the entire SDZ aspires to be a destination that attracts people to visit and experience.

a) Cruise Tourism

Dublin's popularity as a cruise tourism destination has increased significantly in the last decade. Cruise tourism is the fastest growing sector in global tourism and contributes around €50 million to the Dublin economy annually.

Dublin Port's Masterplan 2012 – 2040, launched last year, outlines plans for the construction of a new cruise facility adjacent to the east of the East Link Bridge to accommodate over 135,000 passengers and almost 90 cruise liners each season. This should be actioned.

It is important, therefore, that the SDZ Planning Scheme allows for a variety of tourism offerings for visitors. In addition, it should ensure that there is harmony and synergy between the plans for the Port, Dublin Docklands Area and the central Dublin City area.

b) Business Tourism

Business tourism offers plenty of opportunities for the Docklands and vice versa. The significant increase in capacity, improvements in the access infrastructure, such as the Airport, Port Tunnel and Luas, along with the opening of the Convention Centre Dublin, means the Docklands is well positioned to benefit from business tourism.

Dublin Chamber of Commerce is pleased that Dublin City Council has committed to working with Fáilte Ireland and the Dublin Convention Bureau to ensure that opportunities are developed to achieve increased market share in business tourism.

c) Leisure Tourism

Events such as Dublin Fringe, Docklands Maritime Festival and in particular the Tall Ships Festival, which attracted over 1 million visitors to the area, show the potential of Dublin's Docklands as a leisure tourism hub.

However, the Docklands needs to complement its growing visitor numbers with other types of attractions. Dublin Chamber is encouraged that the SDZ Planning Scheme will support the use of waterfront and water bodies for family attractions, outdoor activities, sports events and the development of waterside facilities.

5. SDZ Process

The Draft Planning Scheme indicates that the SDZ for the Docklands will be in place by the end of November 2013, to coincide with the expiry of the DDDA's Masterplan for the Dublin Docklands Area.

Previous implementations of SDZ planning schemes have taken no shorter than 18 months. Dublin Chamber is concerned at the lack of a 'Plan B' for a scenario in which the SDZ Planning Scheme is not in place by the time the DDDA's Masterplan for Dublin Docklands has expired.

In addition, Dublin Chamber would also like to seek clarity on what planning scheme, if any, will be in effect in the case of such a scenario. We believe that any uncertainty on this issue will discourage developers who are currently seeking to invest in the area.

6. Enterprise and Innovation Support

Dublin Chamber welcomes the commitment in the draft Planning Scheme to seek an iconic physical space to accommodate a focal point for innovation in the City and to encourage the provision of affordable workspace for start-up, enterprise and creative activity.

However, we believe that the provision of physical space alone is not enough to foster enterprise and innovation. To achieve this, Dublin City Council must work closely with organisations which support Irish enterprises by helping them start, grow and innovate.

7. Conclusion

In conclusion, Dublin Chamber is supportive of the development of a new planning scheme for the Dublin Docklands, and looks forward to participating in the continued regeneration of the Docklands and the City.

Thank you for taking the time to complete this comment sheet.

Please place this comment sheet in the comment box provided or return to:

Niamh Lambert, Planning Department, Dublin City Council, Civic Offices, Wood Quay, Dublin 8, on or before **4.30PM on FRIDAY, 10TH MAY, 2013**

or e-mail to: docklands.sdz@dublincity.ie