



Submission to the Dublin City Development Plan Issues Paper 14th January 2015

Executive Summary

Dublin Chamber's mission is to help businesses succeed in a successful Dublin. The Chamber champions the development of Dublin from a good to great international city. This vision for Dublin is a city that works; a knowledge city; a European city; a competitive city; and a well governed city.

In this response to Dublin City Council's Issues Paper,¹ the Chamber has emphasised the vital importance of Dublin to Ireland's economy, and called for integrated national and regional planning to support the role of the capital.

Dublin has recovered and is growing once again, but some of the by-products of growth can be problematic. The present reality of congestion means strategic decisions must be taken now to avoid total gridlock and ensure a sustainable future for movement into, out of, and around the city.

Insufficient infrastructure or barriers that impact on Dublin's competitiveness will cause a slowdown in the city's growth and would have a disastrous effect on the national economy. However, addressing these issues will create a competitive advantage for the city which will allow indigenous companies to grow, encourage further FDI, and foster an innovative and entrepreneurial culture in the Dublin region.

Creating a city that people want to live and work in also requires attention to a number of quality of life issues. This includes improving the supply of housing and office space, increasing density and developing flexible regulations on building heights. Dublin should use the space available to it by redeveloping and regenerating vacant sites across the city. The legacy issues of the crisis period must be addressed, particularly social and community infrastructure.

Ensuring a great quality of life in Dublin also means supporting the thriving sectors for which Dublin has become known. Tourism, food, culture and retail are interdependent and shape many of the recommendations contained in this document.

The Chamber is confident that Dublin's future is bright. We look forward to engaging with the Council throughout the preparation of this Development Plan to make the next seven years great.

¹ Dublin City Development Plan 2016-2022: The Big Picture Issues - <http://dublincitydevelopmentplan.ie/downloads/DublinCityDevelopmentPlanIssuesPaper.pdf>

1. Vision for Dublin

Dublin Chamber of Commerce believes that Dublin City Council's 30-year vision must be to create a capital that is amongst the top cities in Europe to live, work and visit. To achieve this vision, the Council must prioritise:

- A knowledge city rich with innovation and entrepreneurial clusters
- A city that works and is easy to operate in
- A great European city of culture and diversity
- A highly competitive city through a pro-business environment
- A well governed city

It is vital that economic infrastructure is put in place ahead of demand, as has been argued by the National Competitiveness Council and others in recent years.

The population of the Greater Dublin Area (GDA) has grown rapidly since 1990. Current and future transport demand is closely linked to population distribution and growth. Dublin City and County has a population of 1,273,069, while 1.8 million people live in the Greater Dublin Area, comprising Dublin and the counties of Meath, Kildare and Wicklow. This means that the GDA currently accounts for 39% of the State's population.

In 2005, the CSO estimated that the population of the Greater Dublin Area would reach 2.1m persons by 2021, some 10 years earlier than was previously forecast. According to the more recent figures (a population of 2.1m by 2021), it appears that population growth in the GDA has been seriously underestimated. The continued growth in net inward migration and rising birth rate suggests that even the latest CSO central projection will be exceeded.

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.

It is important that we learn from the past and plan for population increases that come in above current forecasts.

2. Dublin's competitiveness on the global stage

For the first time in recorded history, more than half of the world's population live in cities.² The economies of scale available in urban centres drive substantial economic growth across nations. It is expected that by the year 2025, more than 60% of global GDP will be generated by just 600 city regions and the make-up of these top 600 will change dramatically with one in every three developed market city regions likely drop out of the top 600², to be replaced by developing country city regions.

The Dublin region plays a critically important role within the broader national context. Dublin is the only region of international scale in Ireland, comprising approximately 40% of Ireland's population and generating 48% of national GDP.³

Over the past 20 years, the Dublin region's population has grown 80% from 1m to 1.8m today.⁴ From a starting point of effectively 100% Irish national, Dublin's population is increasingly multi-cultural (18% today).⁵ 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 same period Irish GDP has more than doubled from about \$75 billion to \$185 billion with Dublin estimated to account for approximately half of that figure.⁶ Dublin has seen major advances in its public transport system in recent years

2 McKinsey Global Institute, Urban World: Mapping the economic power of cities; March 2011

3 McKinsey Global Institute, Cityscope 2.0 database; 2010

4 CSO.ie, Census 1991 compared to Census 2011

5 CSO.ie, Census 2011

6 CIA World Factbook, as collated through www.indexmundi.com

with the launch of LUAS, improved DART, bus and suburban rail services while across the country the motorway and dual carriageway network has more than doubled in capacity between 2003 and 2009, greatly increasing connectivity between cities and regions.⁷

The region has developed a strong platform across many industries, especially in finance and technology. Over the past few decades Dublin has become a powerhouse of global finance, thanks largely to the success of the IFSC; established in 1987 and now employing more than 33,000 people. History shows that strong, targeted development and growth in Dublin benefits the nation more broadly.

3. Improved integration of planning

Dublin Chamber welcomes the opportunity to input into the new Dublin City Development Plan. However, the Chamber would like to emphasise the importance of a coherent, effective planning system for the Dublin region and for the country as a whole.

The Regional Planning Guidelines will be revised and updated this year by the newly constituted regional assemblies. This means that the Eastern and Midland Regional Assembly will decide on new RPGs for the Greater Dublin Area when the Dublin City Development Plan has already been finalised.

The status of the National Spatial Strategy is unclear, and the existing plan does not inform national policy in any meaningful way.

At the local authority level, there is a lack of coordination between the four Dublin authorities and their respective Development Plans. Fingal County Council's current plan covers the period from 2011-2017, while South Dublin and Dún-Laoghaire Rathdown cover 2016-2022. Dublin Chamber proposes a forum for the four local authorities to discuss and integrate their proposals. Indeed, it may be useful for each local authority to have different development plan timelines. This could encourage local authorities to learn from each other.

4. Population and housing

4.1. Planning for growth

The past seven years have been a tumultuous time for businesses in Dublin. Now as the city continues on the road from survival to recovery, it is vital the Council creates a business environment which can seize opportunities for growth. This is especially important given the role of capital cities as engines of regional and national growth. Dublin City and the GDA account for roughly half of all national output and two in every five jobs in the country.

Dublin is facing increasingly strong competition from cities and regions across Europe. A weakening of Dublin's competitive position in the international context would have a severe impact on the national economy. Underperformance by Dublin would not be offset by growth in other Irish towns and cities, but rather in other urban hubs in Europe or further afield.

The GDA must beat its competitors in all areas where competitiveness matters. The Chamber welcomes the Council's commitment to boosting Dublin attractiveness as a place to live, work and invest. In 2014, Dublin ranked at number 34 in the 2014 Mercer Quality of Living rankings.

Our educational facilities, lower levels of air pollution and quality of recreational and social activities all contributed to our place in the top 50, but more can be done to improve upon this score.

⁷ National Roads Authority, 2009-2003 <http://www.nra.ie/Publications/GeneralPublications/#d.en.3464>

The Development Plan must also 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.

4.2. Housing

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 18% over the course of 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.

5. Shaping the city

5.1. 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. This will not 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.

Strategic Development Zones (SDZs) could help solve the problem. 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.

Of course all citizens must maintain their right to object to ill-considered development, but the importance of office space for Dublin's economy should be acknowledged. Dublin has established itself as the go-to city for companies in a variety of sectors. Dublin is home to 10 of the top 10 global ICT companies and 9 of the top 10 global software companies. The success to date cannot be replicated if there is nowhere to house these firms, and the city will find it extremely difficult to recover from a perception abroad that the market has stagnated.

5.2. Density and height

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". With this in mind, a degree of flexibility with regard to height restrictions should be applied 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 recent 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.

Office developments should ideally be high density, accommodating more staff and thereby ensuring more jobs for Dublin. Higher density development has the added benefit of improving the return on investment in public transport. Dublin City Council should benchmark its plot ratio standards against other European cities, and if necessary, revise these standards in order to boost density in Dublin.

5.3. Vacant land

There are 63 hectares of vacant land in Dublin, comprising approximately 300 individual sites. A crucial element in the Council's effort to create sustainable mixed-use city neighbourhoods will rest on the refurbishment and redevelopment of existing vacant lots throughout the city. The success of projects such as Granby Park, City Assembly House and the Chocolate Factory, together with the positive public response to news of the Iveagh markets and Victorian fruit and vegetable market redevelopments suggest that Dubliners are keen to see vacant sites and buildings put to good use. The Chamber is fully behind these developments which boost indigenous business and enhance community ownership of local amenities.

6. 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.

Mode	2006	2007	2008	2009	2010	2011	2012	2013
Bus	59,874	57,201	60,438	56,168	50,420	54,251	52,007	56,177
Rail	33,534	35,692	32,324	25,723	23,580	22,932	23,999	24,969
LUAS	9,029	9,171	9,242	8,776	9,111	9,949	10,014	10,835
All Public Transport	102,437	102,064	102,004	90,667	83,111	87,132	86,047	91,981
Car	76,850	71,597	67,732	71,043	71,978	69,681	68,626	68,072
Taxi	1,453	2,154	1,930	2,739	2,260	2,674	3,271	3,111
Walk	17,114	18,594	18,360	14,618	15,092	14,551	17,070	17,495
Cycle	4,839	5,676	6,143	6,326	5,952	6,870	7,943	9,061
Goods	2,291	1,445	1,223	1,087	993	1,176	1,099	1,045
Motorcycles	2,395	2,429	2,375	2,060	1,656	1,485	1,425	1,423
Total Person Trips	207,379	203,959	199,767	188,540	181,042	183,569	185,481	192,188

6.1. Prioritisation

The table above summarises the annual change of transport mode for the Dublin canal cordon. The high proportion of private car transport remains an issue. The Council must ensure that public transport (or alternatively walking/cycling) is a viable and preferable alternative to 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.

The ability of the Development Plan to help Dublin achieve its full economic potential is contingent upon Government funding for a variety of major transport projects. Dublin Chamber will champion for greater levels investment to Government on behalf of the city.

6.2. 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 EastLink 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.

6.3. Public Transport

The Council should continue to support the development of public transport in Dublin. When delivered, the LUAS BXD, Metro North and Dart Underground projects will considerably enhance the tourist experience and provide the backbone of an integrated transport service. Dublin Chamber accepts that bus will continue to be the predominant public transport mode in terms of network coverage throughout the Greater Dublin Area. Bus Rapid Transit may be implemented as a short-term solution on busy routes such as those operating between Dublin Airport and Dublin City Centre, however, it is absolutely critical that BRT is not seen as a long-term solution for these routes or for the GDA as a whole. The programme for other public transport projects in Dublin must be maintained.

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.

6.4. 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.

6.5. 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.

7. City and regional economy

7.1. Tourism

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 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. Ensuring the city meets their expectation means that the Development Plan must also acknowledge the visitor-focused strategy outlined in the Destination Dublin report of the Grow Dublin Taskforce, particularly how it relates cultural development, infrastructural requirements for hosting major conferences, port cruise visitors, and creating a facilitative planning approach to events or festivals (including sporting, cultural, business, etc.).

The Grow Dublin Alliance strategy for tourism aims to increase the number of tourists visiting Dublin by 60% by 2020, almost doubling tourism revenue to €2.5 billion. Dublin Chamber looks forward to working with Dublin City Council, Fáilte Ireland and other core stakeholders to implement the overdue Alliance plan. There is a real opportunity to sharply boost tourism jobs in Dublin, and the rest of the country. Research shows that just under half of all the visitors to Dublin go on to visit other parts of Ireland.

The growth in tourism in Dublin is having a hugely positive affect on employment, with CSO figures showing that around one quarter of the 60,000 new jobs created were in tourism-related sectors of the economy, including hotels, food and retail. Dublin's tourism offering will need diverse and flexible products and Dublin needs tourism to achieve its social and economic objectives.

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 principal 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.

7.2. The role of the food and drink sector

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, WiFi, 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.

8. 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.

8.1. Health and hospitals

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. For example, although the new Mater hospital in the inner city is 9 storeys high, due consideration was given to the research which shows that hospitals are major drivers of economic growth and vitally important to inner cities⁸, and planning permission was granted.

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 Mater
- The relocation of the Coombe women's hospital to St James

9. 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.

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.

Linking both sides of the river by the two pedestrian bridges in the Docklands is important for the innovation cluster. 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.

⁸ Initiative for a Competitive Inner City (ICIC) - Hospitals at the vanguard of urban economic development
http://www.icic.org/ee_uploads/pdf/ICIC_WW_Hospital_Anchors_r3.pdf

10. 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.

10.1. 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.

10.2. 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.

11. 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.

11.1. 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 floorspace;
- Convenience floorspace 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.

12. 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. The Chamber looks forward to providing leadership on behalf of the Dublin business community and engaging with the Council as the Development Plan process progresses.