



## **Submission on Proposed Variations (No.'s 8-27) of the Dublin City Development Plan 2016-2022**

**January 2020**

Dublin Chamber is the representative body for business in the Greater Dublin Area, with a cross-sectoral membership of 1,300 firms employing 300,000 people. The Chamber is committed to improving the city's business environment and quality of life in tandem, and strongly supports the vision of compact growth, urban density and brownfield regeneration contained in the National Planning Framework. With this in mind, Dublin Chamber welcomes the opportunity to comment on the Proposed Draft Variations No.'s 8-27 of the Dublin City Development Plan 2016-2022.<sup>1</sup>

The Dublin City Development Plan sets out policies and objectives to give guidance on how and where development should take place in the city. The plan aims to enable the development of an area to happen in a co-ordinated and sustainable manner by designating certain parcels of land for specific purposes such as employment or residential. In previous submissions relating to the Development Plan, Local Area Plans and Strategic Development Zones, the Chamber has emphasised the need for long-term planning and joined up thinking in the Dublin region, with a particular focus on the need for increased urban density.

### **Population Growth and Urban Density**

The current and future demographic pressures facing the Greater Dublin Area must inform policy on residential capacity and transport provision within Dublin City. The population of Dublin City and its suburbs is set to grow by 20-25% to 1.41m people by 2040. However, residential output remains far below what is required to meet even current demand. In the face of these pressures Dublin Chamber supports the re-zoning of appropriate brownfield sites for residential purposes.

Dublin Chamber is a strong advocate for the economic, social, and environmental benefits of urban density. Failure to achieve adequate population density in urban areas is a significant contributor to Ireland's current housing, public transport and infrastructure problems. The scarcity of sites available for new large-scale residential development in Dublin City places a heavy onus on planners to make the most effective possible use of remaining opportunities. The case for higher residential density is particularly strong in relation to the brownfield sites outlined in the document, due to their close proximity to the city centre and the level of existing services such as public transport.

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<sup>1</sup> Dublin City Council, *Proposed Variations (No.'s 8-27) of the Dublin City Development Plan 2016-2022*, [https://consultation.dublincity.ie/planning/proposed-variations-no-8-27/supporting\\_documents/Variation%20Report\\_compressed.pdf](https://consultation.dublincity.ie/planning/proposed-variations-no-8-27/supporting_documents/Variation%20Report_compressed.pdf)

## **Brownfield Regeneration**

Sustainability is an increasingly important factor in decision-making and is particularly relevant in the space of city planning. Dublin Chamber's ambition for Dublin is for it to be a smart, sustainable city with a high population density. Land is a finite resource and every year in the EU 1000 km<sup>2</sup> of undeveloped land is appropriated for housing and infrastructure needs. It is also estimated by the European Environment Agency that there are over three million brownfield sites located across the EU.<sup>2</sup> These sites are often centrally located within major urban areas and are thus well-served by infrastructure and offer an attractive and sustainable alternative to greenfield sites.

Dublin Chamber welcomed the emphasis in the National Planning Framework on brownfield development and the renewal and development of existing cities and urban areas. The NPF aims to achieve a significant proportion of future urban development on infill/brownfield development sites within the footprint of existing urban areas. Its target is that 50% of all future population and jobs growth must take place within the existing 'footprint' of cities and their suburbs.<sup>3</sup> The proximity of the sites outlined in the proposed variations to the city centre, and the presence of the necessary infrastructure, makes them appropriate locations for brownfield regeneration and compact urban growth of the kind mandated by the NPF. Such changes are vital if the Dublin region is to avoid repeating past planning mistakes which have led to an unwelcome level of suburban sprawl.

## **Recommendations**

With reference to the proposed amendments in the consultation document, Dublin Chamber strongly supports the re-zoning of well-served and centrally located brownfield sites for residential use in order to meet urban housing demand and promote compact growth. The sites identified in the consultation document are broadly well suited to regeneration by means of a managed transition from primarily industrial to mixed residential use. This would represent a more intensive, efficient, and sustainable use of these lands. The Chamber recommends that Dublin City Council pursue these rezoning policies in order to help the city meet housing demands, increase urban density, and achieve its NPF targets. The Chamber also recommends ongoing investment in infrastructure and the public realm in the areas surrounding these sites in order to enable them to achieve their full potential.

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<sup>2</sup> European Commission, *Science for Environment Policy, Issue 39. Thematic Issue: Brownfield Regeneration*, May 2013,

[https://ec.europa.eu/environment/integration/research/newsalert/pdf/39si\\_en.pdf](https://ec.europa.eu/environment/integration/research/newsalert/pdf/39si_en.pdf)

<sup>3</sup> Government of Ireland, *Project Ireland 2040: National Planning Framework*, <http://npl.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>