



Submission on Dún Laoghaire-Rathdown County Development Plan 2022-2028 Pre-Draft

February 2020

Dublin Chamber is the representative body for businesses across the Greater Dublin Area, with a cross-sectoral membership of 1,300 firms supporting 300,000 jobs nationally. The Chamber is committed to improving the business environment and quality of life in the region, and strongly supports the vision of compact growth and urban density contained in the National Planning Framework (NPF). With this in mind, Dublin Chamber welcomes the opportunity to comment on the Dún Laoghaire-Rathdown County Development Plan 2022-2028 consultation document.

The Dún Laoghaire-Rathdown County Development Plan 2022-2028 sets out policies and objectives to give guidance on how and where development should take place in the county. The plan aims to enable development 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 Local Area Plans, Strategic Development Zones, and Development Plans across the four local authorities 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 and supporting infrastructure.

Priorities for the Development Plan

In the four years since the adoption of the current Dún Laoghaire-Rathdown County Development Plan 2016-22 the region has experienced significant changes. Dún Laoghaire-Rathdown has seen considerable growth, both economic and demographic, and the new plan must reflect these trends. In a wider context, Dún Laoghaire-Rathdown is a critical part of the Dublin Metropolitan Area. Dún Laoghaire-Rathdown's past ability to deliver housing at an enhanced pace has seen its population increase considerably; this is not expected to change in the near future. With infrastructure pressures, particularly on housing and transport, presenting significant challenges for the region as a whole, Dún Laoghaire-Rathdown will play a vital role in the future development and growth of the Dublin Metropolitan Area.

The Development Plan must be cognisant of the various environmental and spatial plans that must guide and shape the development of the county. The Plan must be consistent with the National Planning Framework (NPF),¹ the Regional Spatial and Economic Strategy

¹ National Planning Framework, <http://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

(RSES), and the Metropolitan Area Strategic Plan (MASP),² all of which contain a vision for compact growth which has been consistently endorsed by Dublin Chamber.

Sustainable growth must also be prioritised. The demand for sustainability to be a central policy focus across all areas has only increased since the last Development Plan. Prioritising sustainability as a core consideration will be essential in ensuring the county's ability to be resilient in the face of environmental challenges.

Compact Growth

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 consultation document details a substantial increase in delivery of housing and employment floor space as well as growth in employment in the county. An increase in the population, including the movement of population into the county, has resulted in a high demand for housing and significant increase in both planning and construction activity.

Dún Laoghaire-Rathdown needs to engage in ambitious sustainable planning with the goal of ensuring compact growth. This is vital if Dublin as a whole is to avoid repeating the mistakes of past planning which have led to an unwelcome level of low-density sprawl right across the four local authority areas. The Urban Development and Building Height Guidelines,³ which were put into effect in December 2018 by the Department of Housing, Planning and Local Government, were consistent with the goal of higher density living in Dublin and Ireland's other cities as laid out in the NPF.⁴

Dún Laoghaire-Rathdown has several high density urban towns, notably Dún Laoighaire itself and Dundrum, where increased height would be appropriate. Areas earmarked for future development, such as Kiltarnan, Cherrywood, and Old Conna should also be prioritised for high density development due to their strong infrastructure connections, particularly public transport. Increased heights and compact growth should be considered, particularly on strategic development sites. Previous development plans throughout Dublin have lacked ambition in regard to high density development and brownfield regeneration. Dún Laoghaire-Rathdown has the advantage of still possessing key green field sites for development, but more consideration must be given to develop these valuable lands appropriately within the current built up footprint to meet goals outlined in the MASP.

Adequate infrastructure for a growing population

Dublin as a whole is growing both economically and in terms of population. Ireland's future is one of increased urbanisation, and we must focus efforts on compact growth to accommodate more people within the existing footprint of the metropolitan area. Dún

² Eastern and Midlands Regional Assembly, <https://emra.ie/dubh/wp-content/uploads/2020/01/EMRA-RSES.pdf>

³ Urban Development and Building Height Guidelines, https://www.housing.gov.ie/sites/default/files/publications/files/urban_development_and_building_height_guidelines_for_planning_authorities_december_2018_0.pdf

⁴ National Planning Framework, <https://www.gov.ie/pdf/?file=https://assets.gov.ie/37937/12baa8fe0dcb43a78122fb316dc51277.pdf#page=33>

Laoghaire-Rathdown's population was 218,000 in 2016 and this is expected to rise to 257,000 by 2031, representing an addition of almost 40,000 people.⁵ Infrastructure within the city is already at capacity, and further investment to meet the demands of the predicted population is vital to securing the county's sustainable future.

As noted in the consultation document, infrastructural blockages were identified and continue to be one of the main impediments to the development of key sites for housing. Dún Laoghaire-Rathdown has had some success in using the Local Infrastructural Housing Activation Fund (LIHAF) to provide infrastructure.⁶ This Development Plan must acknowledge the importance of putting in place the infrastructure in advance of, and to facilitate, development. The construction of enabling infrastructure such as water and transport must be delivered in key development areas to pre-empt and expedite delivery of housing.

When the 'Housing Land Availability Study' is being prepared, the Local Authority should look at the opportunities presented by brownfield sites. The change in zoning of well-serviced but under-utilised employment zones to become high density residential and mixed use developments will be critical to meeting the goals set out under the NPF and MASP. Dublin Chamber welcomed the emphasis in the NPF 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.⁷

Metropolitan Area Strategic Plan

Dún Laoghaire-Rathdown is a major part of the Dublin Metropolitan Area and it is essential that the Development Plan takes into account its place in the region and the connection points to the other Local Authorities. The MASP recognises the significant challenges the city region faces, particularly in areas such as transport, housing, amenities, sustainability and liveability.⁸ In particular, the MASP has identified a number of strategic residential and employment corridors based on their current and future development capacity. Areas of particular note for Dún Laoghaire-Rathdown include:

1. The North-South corridor based on DART expansion.
2. The proposed route for the MetroLink corridor and upgrades to LUAS.
3. Identified urban growth areas including Woodbrook-Shanganagh, Old Conna, Cherrywood, Sandyford, and Ballyogan.

In previous county Development Plans and Local Area Plans, the lack of infrastructure is often cited as a reason for why certain areas should be designated as low density. Due to the rate of expected population growth in Dún Laoghaire-Rathdown, and in the Dublin Metropolitan Area as a whole, it would be unwise to engage in further low density

⁵ Dún Laoghaire-Rathdown County Development Plan 2022 – 2028, <https://storymaps.arcgis.com/stories/eed5b7bee3654d729c74d9cd9e07c135>

⁶ Rebuilding Ireland, <https://rebuildingireland.ie/lihaf/>

⁷ Government of Ireland, *Project Ireland 2040: National Planning Framework*, <http://npi.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

⁸ Eastern Midlands Regional Authority, <https://emra.ie/dubh/wp-content/uploads/2020/01/EMRA-RSES.pdf>

development. The Development Plan must embrace the vision of compact growth through high density contained in the NPF and MASP. This is critical to address Dublin's serious housing challenge. Investment in infrastructure as outlined in the MASP will unlock the development capacity of the strategic development areas identified in Dún Laoghaire-Rathdown.

Particular focus should also be given to areas at the edge of the Local Authority's boundary. These areas may be subject to ineffective planning and development due to decisions taken by bordering local authorities. Co-ordination with South Dublin, Dublin City, and Wicklow Local Authorities is essential in these areas.

Sustainable Movement & Transportation

The development of significant transport projects within the county represents the greatest opportunity for the County Development Plan as these will serve as enablers of sustainable economic, social and population growth for Dún Laoghaire-Rathdown. The NTA's Transport Strategy for the Greater Dublin Area (2016) provides a framework for the planning of transport across the GDA to 2035 and is reasonably ambitious in terms of projects and delivery.⁹ The MASP echoes this strategy.

The new Development Plan must be underpinned by a commitment to sustainable mobility, the keys to which are public transport and active travel. Specifically, it must support delivery of strategic sustainable transport projects including MetroLink, the DART Expansion Programme, Luas expansion, BusConnects, and the Greater Dublin Area Cycle Network Plan. In particular, the Luas and DART Expansion¹⁰ will be key enablers of growth and will provide the transport capacity to unlock key sites for development in Dún Laoghaire-Rathdown. Active travel should be supported across Dublin. This will require ambitious investment in cycling infrastructure and improvement of the public realm to support pedestrians. Dún Laoghaire-Rathdown must ensure that these facilities are delivered in conjunction with or in advance of future development and are sufficient to cope with increasing demand.

Good public transport, cycling, and pedestrian infrastructure makes for liveable communities with a lower requirement for private car use and a lower burden of traffic congestion. Of course, reduced car usage can only be achieved over time with the development of a highly permeable network of public transport routes and services. Car parking policies should reflect this expanding public transport and sustainable mobility network, while supporting modal shift. The number of car parking spaces within Dún Laoghaire-Rathdown should be gradually reduced on a phased basis to reflect and encourage modal shift to public transport and active travel. Car parking should also be future proofed to accommodate electric vehicles. Other marking spaces should be considered for conversion to accommodate active travel options, by including bike parking, e-scooter sharing schemes, or new pedestrian plazas as appropriate.

⁹ National Transport Authority, https://www.nationaltransport.ie/wp-content/uploads/2016/08/Transport_Strategy_for_the_Greater_Dublin_Area_2016-2035.pdf

¹⁰ Irish Rail, <https://www.irishrail.ie/Admin/IrishRail/media/Content/DART-brochure.PDF>

The Development Plan should also scrutinise the use of land that has previously been earmarked and reserved for road network expansion, such as the lands once reserved for the Eastern Bypass.¹¹ No progress has been made by any national authority with respect to the use of this land for a transport investment, and Dún Laoghaire-Rathdown County Council should raise this matter as appropriate, requesting consideration of the land's use for some form of sustainable transport project. Dublin currently faces severe congestion issues and the only solution to this is investment in new sustainable infrastructure.

Economic Development and Employment

As outlined in the consultation document, Dún Laoghaire-Rathdown represents a key component of the national economy and performs an important role in ensuring the continued international competitiveness of the Dublin region. The economic profile of Dún Laoghaire-Rathdown, as a 'highly educated workforce with expertise in a range of high value sectors', is a considerable asset for the region. The new Development Plan must build on this by creating the right conditions for the creation of quality jobs in the right locations.

Compact growth involves locating employment hubs in close proximity to high density residential areas, thereby eliminating or reducing the need to commute. This should be a feature of the Development Plan. Public transport should also be considered in this context, with employment zones located close to key transport hubs such as DART or Luas stations. An excellent example of this type of development in Dublin is the Docklands Strategic Development Zone (SDZ).¹² The Cherrywood SDZ has similar potential, but while residential developments have progressed there has been a noticeable absence of commercial development. Town centres, both historic and new, need to be planned and carefully managed in accordance with place-making principles, ensuring a high-quality public realm.

City Resilience

The Development Plan must be underpinned by a firm commitment to be responsive to our national environmental challenges and to ensure that development occurs within environmental limits. The entire Dublin Metropolitan Area needs to focus on its resilience as a built up urban area and commit to sustainable land management and resource efficiency in order to assist in a transition towards a low carbon society.

The maintenance of good water quality, air quality, and sustainable waste management should be infrastructure priorities. In recent months other parts of Dublin witnessed the vulnerability of existing water infrastructure and the pressure placed on it by current demand. Dún Laoghaire-Rathdown County Council should work proactively with Irish Water to progress and deliver vital infrastructure projects in order to sustain current services and enable future development. The circular economy too should be considered in relation to the reduction and reuse of waste through the procurement and delivery of services. The Council should undertake the latest advice on green public procurement criteria and ensure that it is sustainable in every endeavour.

¹¹ Transport Infrastructure Ireland, <https://www.tii.ie/tii-library/strategic-planning/strategic-reports/EasternBypassCorridor-Protection-Study-DLR-Jan-11.pdf>

¹² Irish Planning Institute, <https://www.ipi.ie/news/latest-news-press-releases/dublin-docklands-scheme-wins-planning-award>

Recommendations

The consultation on the Development Plan comes at an important time for Dún Laoghaire-Rathdown and for the wider Dublin region, given the current growth and economic prosperity being experienced and in light of the growth and opportunities that are forecast over the coming years.

Dublin Chamber is a strong supporter of the NPF and the vision of compact growth. This vision must be reflected throughout the new Development Plan. Investment in enabling infrastructure is essential both for future development and for the renewal of existing built up areas. Without improvements to key elements of infrastructure, such as water, public transport, and the public realm, Dún Laoghaire-Rathdown will be unable to meet its compact growth and brownfield regeneration targets. This will result in low density urban sprawl and a return to the failed planning policies of the past.

Dublin Chamber acknowledges the significant challenges that Dún Laoghaire-Rathdown faces in terms of development. With an increasing population, housing shortage, and high levels of congestion, the planning and development of the area must be considered carefully. The new Development Plan must support the sustainable compact growth of Dún Laoghaire-Rathdown and its transition to a low carbon, climate resilient, and high-density County playing an integral role in the Dublin region.

In particular, we call on the Dún Laoghaire-Rathdown Development Plan to commit to:

- Consistency with the vision and objectives in the National Planning Framework and Metropolitan Area Strategic Plan.
- Pursuing planning policies in line with compact growth, brownfield regeneration, and high density development.
- Ensuring the development of enabling infrastructure to meet the needs of Dún Laoghaire-Rathdown's growing population.
- Development and regeneration of town centres and urban hubs through careful planning and a high quality public realm.
- Co-ordination with the rest of the Dublin Metropolitan Area to ensure consistency in planning and development across the four Local Authorities.
- Prioritisation of the delivery of sustainable public transport and active travel projects.
- Sustainable development and land management to improve city resilience.