



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

**April 2021**

Dublin Chamber is the representative body for businesses across the Greater Dublin Area and 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 use.

The Chamber is committed to improving Dublin's business environment and quality of life in tandem, and strongly supports the vision of compact growth and urban density contained in the National Planning Framework (NPF). With this in mind, and based on the insights brought by the Covid-19 crisis, the Chamber developed its *Dublin: The 15 Minute City* planning document. By creating a 15 Minute City, right across the four local authority areas, the liveability of Dublin can be significantly enhanced. Reduced congestion and pollution, enhanced public spaces, thriving local economies, and efficient public transport would all improve Dublin's international reputation and competitiveness. Such a vision, if realised successfully, could prove transformative for Dún Laoghaire-Rathdown and for Dublin as a whole. It would enhance not only the lives of its residents and local economy, but the county's attractiveness as a place to do business.

### **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 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),<sup>1</sup> the Regional Spatial and Economic Strategy (RSES), and the Metropolitan Area Strategic Plan (MASP),<sup>2</sup> 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.

### **Delivering a 15 Minute City for Dublin**

Dublin Chamber recently developed our *Dublin: The 15 Minute City* report.<sup>3</sup> The 15 Minute City is an ambitious urban planning concept focusing on community planning, the local economy, and the liveability of a city. Creating a 15 Minute City is about designing walkable communities in which people can live and access most of their daily needs within 15 minutes of active transport, i.e., walking or cycling. These places should have diverse housing options and access to safe cycle routes and local public transport, local health facilities, parks, shops, and other local infrastructure.

The core of this concept is mixed development, integrating as many uses as possible within the same space. This in many ways counteracts the past century of planning which has focused on separating residential areas from those for retail, employment, manufacturing, and entertainment. This traditional way of planning has been a key driver behind modern planning problems, such as urban sprawl and car-dependent communities which are particularly evident in parts of Dún Laoghaire-Rathdown.

The guiding principles outlined in the 15 Minute City report should be adopted by planners and local and national government to improve the liveability of our cities. In previous submissions relating to Development Plans, Local Area Plans and Strategic Development Zones, Dublin 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, enhanced public transport, and investment in public realm. Successful elements of the 15 Minute City concept can be found throughout Dublin and the overall vision for a 15 Minute City complements current and future development plans by providing a new lens through which both planners and residents can identify the infrastructure and facilities which their communities need.

### **Mixed development and the 10 Minute Neighbourhood**

Dublin Chamber welcomes the commitment given in the plan to achieving 10 Minute Neighbourhoods and enabling the 'creation of vibrant, sustainable neighbourhoods with access to good housing choice, open space and recreation, a range of quality transport options and appropriate social and community infrastructure'. This central vision echoes the

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

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

<sup>3</sup> Dublin Chamber, *Dublin: The 15 Minute City*, [https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin\\_The-15-Minute-City.pdf](https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin_The-15-Minute-City.pdf)

guiding principles outlined in our own 15 Minute City report and should be placed at the core of what the Dún Laoghaire-Rathdown Development Plan is setting out to achieve.

The Development Plan states that 'not every house will have all such facilities located within this timeframe' but that they will all have access to a high-quality public transport link within 10 minutes. Development Plan and Dún Laoghaire-Rathdown County Council, in pursuing the 10 minute neighbourhood, is ambitious and sets out what facilities must be included at a local level. Facilities should be separated into local and higher-level facilities with the local level being easily accessed through active transport within the given timeframe. By identifying and detailing the facilities that must be located within that 10-minute access timeframe, the Plan can enable the Council to track its progress in achieving the 10 minute neighbourhood, but also clearly identify where investment in infrastructure and community facilities is required.

### **Sustainable Neighbourhood Infrastructure**

Dublin Chamber particularly welcomes the provision of the Sustainable Neighbourhood Infrastructure (SNI) land use zoning. We commend the Council for this innovative approach in identifying 'existing facilities and services considered to be central to sustaining and building neighbourhoods'. The Council should consider integrating this approach into identifying future sites for Sustainable Neighbourhood Infrastructure, particularly in areas of the county with existing infrastructure deficits. The use of brownfield sites and infill sites in particular should be considered for SNI zoning. This is of particular note for the historic and existing built urban footprint of Dún Laoghaire-Rathdown where some facilities required to achieve the vision of the 15 Minute City are absent, and also areas that have been victim to suburban sprawl with masses of residential buildings and little else.

Under the proposal for SNI zoning, plans are outlined for a Community Strategy to carry out an audit of community facilities and identify where new and improved infrastructure should be provided. This was one of Dublin Chamber's key calls in our 15 Minute City report and we welcome its inclusion. However, the Chamber stresses that this should be prioritised for delivery in the first year of the Development Plan as it has the potential to significantly impact on future development in the area and the ability to achieve 10 minute or 15 minute neighbourhoods within the life time of this plan.

Stress the importance of public realm and active transport infrastructure in achieving the 10 minute or 15 minute aspiration for Dún Laoghaire-Rathdown. Communities and neighbourhoods need to be easily penetrable, and investment is badly needed in footpaths, and street lighting. The public realm must be invested in and maintained to a high standard to ensure that all members of the community feel safe in urban spaces at all hours of the day, particularly in winter.

### **Fostering positive change through place making and planning**

A core recommendation for achieving Dublin Chamber's 15 Minute City proposal was 'Consideration of partnerships between industry and communities to develop mixed-use spaces'. The Chamber welcomes the commitment to use the Local Area Plans, Urban Framework Plans and Strategic Development Zones to require applicants to demonstrate how new residential development contributes towards the 10 minute neighbourhood. Putting

these concepts at the core of our urban planning and design is central in achieving the vision, not just in Dún Laoghaire-Rathdown but right across the city.

Many of the concepts in consultation document endorse the Chamber's 15 Minute City policy, e.g., clustering, mixed development, sharing of facilities, and the need for multi-functional spaces. Another area of interest is the suggestion that the 'Developer may be required to provide space for a new facility or contribute towards the provision'. We welcome the inclusion of more private and public collaborations in contributing towards vital social infrastructure.

There is scope, certainly at a planning stage and initial design stage, to encourage joint community and private collaborations. This is an opportunity to be ambitious in terms of what can be achieved, to think outside the box in terms of design opportunities, and not to inhibit innovative design and planning in creating these spaces. There are international examples of developments in which there is a soccer pitch or park on the roof, or community swimming pool in the basement; and a recent American example in which social housing has been built above libraries. Increased residential development need not mean a decrease in facilities; on the contrary, it can contribute to enhancing communities. Particularly important are the brownfield and infill sites in already built-up neighbourhoods. Any remaining sites, which may be zoned residential, will often be viewed by the local community as being required to address community infrastructure deficits, e.g., for a new school, park, or playground. The developer and the local community working together at an early stage in the planning and design process would improve stakeholder relations and lead to better community facilities and fewer planning objections, ultimately speeding up development.

## **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. An increase in the population 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,<sup>4</sup> 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 set out in the NPF.<sup>5</sup>

Dún Laoghaire-Rathdown has several high-density urban towns, including Dún Laoighaire and Dundrum, where increased height would be appropriate. Areas earmarked for future development, such as Kiltarnan, Cherrywood, and Old Conna should be prioritised for high

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<sup>4</sup> 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](https://www.housing.gov.ie/sites/default/files/publications/files/urban_development_and_building_height_guidelines_for_planning_authorities_december_2018_0.pdf)

<sup>5</sup> National Planning Framework, <https://www.gov.ie/pdf/?file=https://assets.gov.ie/37937/12baa8fe0dcb43a78122fb316dc51277.pdf#page=33>

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 residential density and brownfield regeneration. Dún Laoghaire-Rathdown has the advantage of still possessing key greenfield sites for development, but more consideration must be given to appropriately developing valuable lands within the current built-up footprint to meet goals outlined in the MASP.

The Chamber offers a note of cautions regarding the document's emphasis on the need to strike a balance between compact urban growth and capacity of existing infrastructure, particularly social and amenities infrastructure that supports residents and their neighbourhoods. While this balance is extremely important, the Chamber would prioritise being more ambitious in terms of developing the community infrastructure required to enable the compact growth that is intrinsic to the goals set out in the NPF.

### **Adequate infrastructure for a growing population**

Ireland's future is one of increased urbanisation, and local government must focus efforts on compact growth to accommodate more people within the existing footprint of the Dublin Metropolitan Area. Dún 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.<sup>6</sup> Infrastructure in Dublin is already at capacity, and further investment to meet the demands of the future population is vital to securing a sustainable future for the capital city.

As noted in the previous 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.<sup>7</sup> 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 examine 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 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>8</sup>

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<sup>6</sup> Dún Laoghaire-Rathdown County Development Plan 2022 – 2028, <https://storymaps.arcgis.com/stories/eed5b7bee3654d729c74d9cd9e07c135>

<sup>7</sup> Rebuilding Ireland, <https://rebuildingireland.ie/lihaf/>

<sup>8</sup> Government of Ireland, *Project Ireland 2040: National Planning Framework*, <http://nfp.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

## **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 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.<sup>9</sup> 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, a present lack of infrastructure was often cited as a reason why 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 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 incongruent decisions taken by bordering Local Authorities. Co-ordination with South Dublin, Dublin City, and Wicklow is essential in these areas.

## **Sustainable movement and 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.<sup>10</sup> The MASP echoes this strategy.

The movement of people is intrinsic to the vision of the 15 Minute City, which concerns how they connect not just to their own communities, but to the wider city. While we welcome the focus on the 10 Minute Neighbourhoods in the Development Plan, there is a need for a clear and ambitious commitment given to improving public transport provision, frequency and capacity, investing in active transport infrastructure and developing an ambitious minimum level of local services that residents can expect to find within the space covered by that initial 10 minute journey.

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<sup>9</sup> Eastern Midlands Regional Authority, <https://emra.ie/dubh/wp-content/uploads/2020/01/EMRA-RSES.pdf>

<sup>10</sup> National Transport Authority, [https://www.nationaltransport.ie/wp-content/uploads/2016/08/Transport\\_Strategy\\_for\\_the\\_Greater\\_Dublin\\_Area\\_2016-2035.pdf](https://www.nationaltransport.ie/wp-content/uploads/2016/08/Transport_Strategy_for_the_Greater_Dublin_Area_2016-2035.pdf)

Dublin Chamber welcomes the ambition to reduce the reliance on the private car. A clear commitment to prioritising investment in active and public transport infrastructure is needed to achieve this goal. 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 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.

Reducing reliance on the car will enhance Dún Laoghaire-Rathdown's credentials as a resilient county with sustainability at its core. Such a move not only improves air quality and reduces congestion in Dún Laoghaire-Rathdown but will have a knock on impact across the whole city region. In the provision of public transport, and indeed in ensuring the viability of concepts like the proposed 10 Minute Neighbourhood, it is vital that there is collaboration and joined-up thinking between Local Authorities across the Dublin Region on transport provision.

The new Development Plan must also 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.<sup>11</sup> In particular, the Luas and DART Expansion 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.

Bus services in particular are vital in achieving the 15 Minute City / 10 Minute Neighbourhood vision, particularly in the areas of Dún Laoghaire-Rathdown that have historically been subject to urban sprawl and are often impenetrable by active transport. Last and first mile solutions for Dún Laoghaire-Rathdown should also be examined. With a considerable portion of the population travelling into the city centre each day, the journey to and from the main transport arteries should be considered. Supporting infrastructure for active transport and shared mobility rental schemes should be examined to see what level of service is required to drive modal change and whether this is currently being met.

## **Economic development and employment**

Dún Laoghaire-Rathdown performs an important role in ensuring the continued international competitiveness of the Dublin region, and as such it represents a key component of the

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<sup>11</sup> Irish Rail, <https://www.irishrail.ie/Admin/IrishRail/media/Content/DART-brochure.PDF>

national economy. 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).<sup>12</sup> The Cherrywood SDZ has similar potential, but while residential developments have progressed there has been a noticeable absence of commercial development.

In keeping with the 15 Minute City vision, the Development Plan outlines how few parts of Dún Laoghaire-Rathdown are more than 10-15 minutes’ travel time from a District or Major Town Centre. With the rise of flexible and hybrid working, suburban towns and neighbourhoods could see a significant boost to their local economy.

The Covid-19 crisis has accelerated emerging trends in the areas of remote and flexible working and the rise of the digital agenda. However, it also rapidly impacted and accelerated significant change in the retail sector. The future Development Plan should be flexible, considered, and adaptable in its approach to town centres as the change in the retail sector emerges and stabilises over the next few years. Consideration should be given to some of the relevant recommendations in the recent study conducted by Bannon and Dublin City Council on the retail sector in the city centre<sup>13</sup>.

Town centres, both historic and new, also need to be planned and carefully managed in accordance with place-making principles, ensuring a high-quality public realm to encourage people to visit, stay, and shop, but also to encourage over the shop living and increased residential uses within our town centres.

## **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

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

<sup>13</sup> Bannon & Dublin City Council, *Role & Function of Retail in the City Centre*, <https://consult.dublincity.ie/en/system/files/materials/601/Pre%20Draft%20Plan%20Background%20Paper%20-%20Retail%20Study.pdf>

progress and deliver vital infrastructure projects to sustain current services and enable future development. The circular economy should also 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.

## **Recommendations**

The second round of consultation on the Development Plan comes at a critical time for Dún Laoghaire-Rathdown and for the wider Dublin region, given the current economic challenges, emerging trends and changes to the way people live and work, and in light of the population growth that is forecast over the coming years. 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 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.

Dublin Chamber particularly welcomes the approach taken in the Development Plan to pursue the 10 Minute Neighbourhood, which is in keeping with the board principles of Dublin Chamber's vision for a 15 Minute City. Dún Laoghaire-Rathdown has particularly suffered in the past from low density suburban sprawl and the 15 Minute City vision can help to counteract this tendency and transform affected communities.

The new Development Plan must support sustainable and compact growth in 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, Dublin Chamber calls on the Dún Laoghaire-Rathdown Development Plan to commit to:

- Consistency with the vision and objectives in the National Planning Framework and the Dublin Metropolitan Area Strategic Plan.
- Pursuing planning policies in line with compact growth, brownfield regeneration, and high-density development.
- Commitment to the guiding principles of hyper-proximity, transport-orientated development, and the 15 Minute City vision in the Development Plan
- A 15 Minute City / 10 Minute Neighbourhood pilot programme to establish learnings and identify implementation issues arising from such an ambitious plan.
- The Development Plan to be more ambitious in setting out what facilities must be included at a local level to achieve the 15 Minute City / 10 Minute Neighbourhood.
- Use of the Local Area Plan and Strategic Development Zone models to deliver the 15 Minute City / 10 Minute Neighbourhood vision and to encourage further development and regeneration in built parts of the city.
- Use of the SNI to identify brownfield and infill sites to be used to address infrastructure deficits.

- Development and regeneration of town centres and urban hubs through careful planning and a creation of a high-quality public realm.
- An ambitious approach to the town centre and retail strategy while maintaining the need to be flexible as the sector experiences rapid change.
- Ensuring the development of enabling infrastructure to meet the needs of Dún Laoghaire-Rathdown's growing population.
- 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.