



## **Dublin Chamber Submission on the proposed amendments to North Lotts and Grand Canal Dock Planning Scheme**

**November 2019**

*Dublin Chamber welcomes the opportunity to comment on the Proposed Amendments to North Lotts and Grand Canal Dock Planning Scheme. As the representative body for business in the Greater Dublin Area, the Chamber has a cross-sectoral membership of 1,300 firms employing 300,000 people. We are committed to improving the city's business environment and quality of life in tandem and are strong supporters of the vision of compact growth and urban density contained in the National Planning Framework.*

*Strategic Development Zones (SDZs) enable the development of an area to happen in a co-ordinated and sustainable manner by designating certain parcels of land for fast track planning process where the development of those lands is considered to be of strategic national importance.*

*In previous submissions in regards to LAPs and SDZs the Chamber has emphasised the need for long-term planning and joined up thinking in the Dublin Region. The Chamber draws particular attention to the current and future demographic pressures facing the Greater Dublin Area, and argues that these trends should inform policy on residential capacity and transport provision within Dublin City. With specific reference to the proposed amendments to North Lotts and Grand Canal Dock, Dublin Chamber advocates greater increased density to meet urban housing and office space demands.*

### **Dense Growth**

Dublin needs to engage in ambitious city planning with the goal of ensuring high density in the city centre. This is vital if Dublin is to avoid repeating the mistakes of past planning which have led to an unwelcome level of urban sprawl. The Urban Density and Building Height Guidelines, which were put into effect in December 2018 by the Department of Housing, Planning and Local Government, were a welcome development given the goal of higher density living in Dublin and Ireland's other cities, as laid out in the Ireland 2040 plan. The

close proximity of the North Lotts and Grand Canal Dock to the heart of the city, and crucially its distance from the historic core, makes the area a perfect location for taller buildings.

The Chamber is broadly supportive of the provisions for increased height within the amendments to the North Lotts and Grand Canal Area. The Chamber however believes that the proposed amendments in increase in height and density are largely superficial and lack ambition. The planning scheme has set specific heights for the buildings in the area, constraining the opportunities for greater heights and greater density. The constraints in heights in the Docklands area are considerably lower than those on lands in the immediate vicinity of the SDZ area, such as the current building of the 17 storey EXO building and the recent approval of the 22 storey Tara street tower. As this area has been designated an area of strategic national importance it unusual for the council to put measures in place that have the potential to harm or hinder the potential development opportunities.

### **Population Density**

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 high density is particularly acute for North Lotts and Grand Canal Dock due to its reputation as an employment hub, its close proximity to public transport sites, availability of brownfield sites and its desirability as a place to live.

Dublin Chamber supports the National Planning Framework (NPF) in which the priority is compact growth. To achieve this, 50% of all future population and jobs growth must take place within the existing 'footprint' of cities and their suburbs. 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.

On balance, Dublin Chamber believes that the proposed amendments to the North Lotts and Grand Canal Dock planning scheme is not sufficiently ambitious with respect to both the potential housing and office capacity given the scale of the challenges facing the capital city region. The Chamber is of the view that the proposed amendments represent a step in the right direction, but greater density can be achieved in this area with greater ambition.

## **Recommendations**

Dublin Chamber is in favour of changing the building height guidelines with a view to allowing buildings of greater height in the North Lotts and Grand Canal Dock scheme, however we feel that the current proposals lack ambition and will fail to ensure that the finite amount of development space that is available in the core city centre is maximised. Dublin Chamber believes that allowing taller buildings in the North Lotts and Grand Canal Dock area can help deliver high density living in a well-serviced area which features high-quality transport links and a vibrant business community.