



Submission on Dublin City Development Plan 2022-2028 Pre-Draft Consultation

February 2021

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 Dublin City Development Plan 2022-2028 pre-draft consultation.

The Dublin City Development Plan 2022-2028 sets out policies and objectives to give guidance on how and where development should take place in the City. 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.

The Chamber is committed to improving the city's business environment and quality of life in tandem, and strongly supports a vision of sustainability, compact growth, urban density, and brownfield regeneration. With this in mind, and based on the insights brought by the Covid-19 crisis, the Chamber recently developed its 'Dublin: The 15 Minute City' planning document. By creating a 15 Minute City, right across the four local authority areas, we can significantly enhance the liveability of Dublin. 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 carried out successfully, could prove transformative for Dublin City and the wider county as a whole. It would enhance not only the lives of its residents and local economy, but the city's attractiveness as a place to do business.

Priorities for the Development Plan

In the five years since the adoption of the current Dublin City Development Plan 2016-22 the region has experienced significant changes. Dublin City has seen considerable growth, both economic and demographic, and the new plan must reflect these trends. A key priority for the Development Plan will be managing and co-ordinating the predicted population growth as Dublin City moves towards an additional 100,000 people by 2031¹ alongside the NPF goal of requiring at least half of all future housing and employment growth in Dublin to be located within and close to the existing 'built-up' area of the City. With infrastructure

¹ <https://www.dublincity.ie/sites/default/files/2021-01/full-document-pre-draft-consultation-strategic-issues-paper.pdf>

pressures, particularly on housing and transport, presenting significant challenges for the region as a whole, along with the additional pressures of Covid-19, Brexit and Climate Change this Development Plan is of critical importance to the future development of the city, with both challenges and opportunities in equal measure.

Alongside these changes there's has also been significant changes in terms of strategic policy relating to planning and development nationwide. Development Plan must be cognisant of the various environmental and spatial plans that must guide and shape the development of the city. The Plan must be consistent with the National Planning Framework (NPF),² the Regional Spatial and Economic Strategy (RSES), and the Metropolitan Area Strategic Plan (MASP),³ all of which contain a vision for compact growth which has been consistently endorsed by Dublin Chamber.

The economic importance of Dublin City, as centre for significant employment and as a destination must also be highlighted. The pandemic has acted as a catalyst in speeding up changes that were already in progress, flexible working moves to online shopping present both challenges and opportunities to Dublin City and both must be addressed. The impact of the Covid-19 crisis has brought into sharp focus the broader challenges that face Dublin and other cities. The crisis has highlighted the structural fragility of our urban centres, with the retail and hospitality sectors severely impacted as the periods of lockdown and restrictions have repeatedly emptied out our city centre. Better planning and development will not provide all the answers, but it has a significant role to play in creating a positive framework for delivering viable urban centres.

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. Now is the time to integrate sustainable thinking and development into our city and prioritising sustainability as a core consideration will be essential in ensuring the city's ability to be resilient in the face of environmental challenges.

Delivering a 15 Minute City for Dublin

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.

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 and will provide a new lens through which both planners and residents can identify the infrastructure and facilities which their communities need.

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

² National Planning Framework, <http://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

³ Eastern and Midlands Regional Assembly, <https://emra.ie/dubh/wp-content/uploads/2020/01/EMRA-RSES.pdf>

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 less evident in Dublin City but contribute significantly to the congestion problems in the city centre.

Dublin Chamber argues that the 15 Minute City is a guiding principle that must now be adopted by planners and local and national government to improve the liveability of our cities. In focusing on how the Development Plan should strive towards this vision of the 15 Minute city they should look to pilot programmes, similar to those used in the Melbourne 20 Minute Neighbourhoods⁴, to be trialled in a community to establish learnings and identify implementation issues arising from such an ambitious plan. A review should also be undertaken to identify parts of the city that have a particular shortage of the facilities essential to creating a 15 Minute City, particularly in terms of greenspace and public & active transport.

In previous submissions relating to Development Plans, 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, enhanced public transport, and investment in public realm. Drawing on our long history of campaigning on these interlinked issues, and in the face of the Covid-19 crisis, Dublin Chamber is proposing the concept of a 15 Minute City to enhance the liveability of Dublin.

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 strategic issues consultation paper details a substantial increase in delivery of housing and the development of strategic housing and employment areas.

Dublin City 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. Dublin City is currently characterised by a low to medium rise built environment and generally low density. Since the publication of the last development plan in 2016 planning policy has changed significantly with a significant focus now being placed on increasing density and compact growth.

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).⁵ Sites at Poolbeg West and the Strategic Development Regeneration Areas (SDRAs) have the potential to produce similar results.

⁴ <https://www.planmelbourne.vic.gov.au/current-projects/20-minute-neighbourhoods>

⁵ Irish Planning Institute, <https://www.ipi.ie/news/latest-news-press-releases/dublin-docklands-scheme-wins-planning-award>

The issues paper has ear marked areas such as Ballymun, Belmayne and Poolbeg West for strategic development and for regeneration. These future development areas should also be prioritised for high density development due to their strong infrastructure connections, particularly those located on key public transport corridors. Increased heights and compact growth should be considered, particularly on strategic development sites where the infrastructure can support greater numbers. Previous development plans throughout Dublin have lacked ambition in regard to high density development and brownfield regeneration. Dublin City has the dis-advantage of few remaining green field sites for development, this puts into sharper focus the need to unlock the remaining sites and the need for tools to unlock brownfield sites. The scarcity of sites available for new large-scale residential and community development in Dublin place a heavy onus on planners to make the most effective possible use of remaining opportunities.

Building Height and Density

The restructuring and re-orientation of the planning system and framework has resulted in the need for a different approach to height and density in the city. The Dublin City Council's background paper on building height and density outlines the challenges and opportunities associated with increased density and building heights. Increased density and compact growth are core principles of the NPF which Dublin Chamber has been a strong support of.

The debate around height has changed, instead of blanket height caps set by the council in specific areas the focus is on spatial analysis and criteria analysis in determining is a development right for a specific area. The Chamber welcomes this approach as it enables height and density to thrive in parts of the city that have the infrastructure and facilities to support it.

Increasing the cities density is key for Dublin to meet the demands of the projected population growth and solve the ongoing housing crisis which threatens Dublin's reputation, affordability and overall competitiveness as a city. The Chamber envisions that increased urban density will create a sustainable resilient city, reduce urban sprawl and consolidate height around infrastructure. There is also a need to ensure that the remaining greenfield and brownfield sites in the city centre are developed appropriately to meet our compact growth targets, but also enable us to strive towards a sustainable future and enhance the quality of life in the city centre.

In a city, like Dublin, which is currently characterised by low to middle rise built environment in order to achieve compact growth, height and density are essential planning tools. Dublin Chamber recommends the following criteria be considered in identifying appropriate areas, sites and communities for increased height;

- Consolidate height and density around infrastructure – Ensure that where height and density are planned that the supporting core infrastructure, water, waste, transport, electricity and the broader aspects of social, retail, and recreational infrastructure are present. This enables the vision of the 15 Minute City.
- Addressing infrastructure deficits - Where height is deemed appropriate but some infrastructure elements are not present DCC should work to bring online enabling infrastructure to unlock potential development, particularly in areas with brownfield sites and underutilised land.

- Transport orientated development – prioritising height and density where transport infrastructure enables compact growth. The DART and Luas are key growth enablers in the city and MetroLink will provide similar benefits. Height and density should be prioritised in close proximity to public transport corridors, counteracting the previous narrative of car dependent communities.
- A clear commitment to no upper limit to density or height but to ensure a process of local planning engagement, high quality design and place making at its core. Arbitrary height caps hinder architectural innovation and urban design.
- Further developing areas where height and density is already present. Arbitrary height restrictions in specific parts of the city lack ambition and stifle projects. Using height and floors as a guideline for how well a building will enhance the skyline, local area or integrate into the community does not work. Instead the council should develop new guidelines that instil a strong sense of design, form and function into proposals with significant height and density.
- High quality design and place making must be to the fore. The negative opinion that some residents in the city have towards high rise buildings must also be countered by ensuring a strong sense of design and understanding of what makes good apartment and city centre living.

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. Dublin City's population was 554,554 in 2016 (Census 2016), experiencing a 4.6% increase in population growth from 2011. However it must be noted that this development was largely uneven, with the majority of growth occurring in Dublin Central where the population grew by 7.8%. With a projected increase of between 58,000 to 70,000 people by 2026 there is particular need to focus on balanced growth across the city. ⁶Infrastructure within the city is already at capacity, and further investment to meet the demands of the predicted population is vital to securing the city's sustainable future.

As noted in the strategic issues document, Dublin City is not directly responsible for all aspects of infrastructure provision however infrastructural blockages have been identified and continue to be one of the main impediments to the development of key sites for housing. 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

⁶ <https://www.dublincity.ie/sites/default/files/2021-01/full-document-pre-draft-consultation-strategic-issues-paper.pdf>

use developments will be critical to meeting the goals set out under the NPF, MASP and delivering the vision of a 15 Minute City. 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

Mixed- use development will be key to achieving sustainable communities and realising the 15 Minute City vision. This includes ensuring there are restaurants and shops as well as leisure and cultural facilities within such strategic developments. Mixed housing is essential in ensuring that an area caters for all, including families, renters, first time buyers and the elderly. Thus as people age in the community, there is a variety of housing options to suit their needs and stage in life. By having a mix of housing options, a mix of demographics in an area is cultivated. This ensures that local facilities are neither over nor under capacity due to demand. Increased ambition in regards to height is particularly appropriate in developing brownfield sites and strategic development areas. By ensuring an appropriate mix of housing, more sustainable communities are created.

The consultation issues paper has a particular focus on not just strategic development, but on regeneration, and in that regard the Chamber urges the Council to consider the principles of the 15 Minute City. The 15 Minute City concept creates a focus and ensures that planners and local authorities look at the needs of a local community, what facilities or infrastructure are in place, which are not, and how shortfalls can be addressed. Planning should not always focus on greenfield sites but more on how to improve the liveability of existing communities and transform them into desirable and safe places for their current and future residents. This strategy aligns closely with the National Planning Framework (NPF) which focuses on compact growth and brownfield regeneration.

Metropolitan Area Strategic Plan

Dublin City 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 Dublin City include⁹:

1. Target of at least 50% of all new homes within or contiguous to the existing built up area in Dublin
2. South-West Corridor – Dart Expansion and Luas Red Line Development

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

⁸ Eastern Midlands Regional Authority, https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf

⁹ Eastern Midlands Regional Authority, https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf

3. City Centre within the M50 – Identified urban growth areas including Naas Road, Docklands, Poolbeg and North East Inner City
4. Brownfield regeneration and re-intensification of underutilised lands
5. Metrolink – Luas Corridor – will provide infrastructure to unlock sites for increased density

In previous 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 Dublin City, 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 Dublin City. By increasing its urban density, Dublin can also enhance the viability and cost-effectiveness of public transport projects. Increased population and consequent demand for services and public transport creates communities that can sustain the facilities vital to their local economy, and will help to realise the vision of the 15 Minute City.

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 Dún Laoghaire-Rathdown, South Dublin, and Fingal Local Authorities is essential in these areas. While the MASP provides a vision for the development of the Greater Dublin Area, the reality is a collection of separate authorities with individual jurisdiction. The mechanisms proposed in the MASP to provide co-ordination across the individual authorities needs to be put in place and to report on delivery of the overall objectives. This will also help mitigate the particular problems that often occur at the boundaries of individual authorities.

The Naas Road area in particular has been identified in RSES as a significant landbank with long-term potential to become a major district centre. The lands in this area cover both Dublin City Council and South Dublin County Council and it is vital that the two local authorities work together to ensure the development of this area reaches its full potential. While this area benefits from the presence of the Luas and key road infrastructure, significant investment is required in infrastructure to enable development. The Naas Road lands are a prime opportunity for Brownfield regeneration, mixed development, and hyper proximity, which together will enable a 15 Minute City vision.

Sustainable Movement & Transportation

The development of significant transport projects within the city represents the greatest opportunity for the Development Plan as these will serve as enablers of sustainable economic, social and population growth in the city. Good public transport is also essential in realising the vision of a 15 Minute City. 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

recently underwent a review process. Dublin Chamber's submission to the NTA's review¹⁰ highlighted the need to prioritise projects that:

- are shovel ready and resist the temptation to re-open consultation phases post-pandemic on key infrastructure projects that have long been a necessity for the city
- help to achieve the vision of a 15 Minute City and enable us to reach the level of public transport that enable modal change.
- have sustainability to the fore. Prioritisation should be given to projects that provide transport infrastructure to enable low carbon travel. This includes active travel infrastructure in the immediate term, and longer-term MetroLink and DART Expansion, including the DART Interconnector.

The strategic issues paper acknowledges the need to reduce the demand for travel and the reliance on the private car and supports moves towards pedestrian, active and public transport, all of which are essential to realising the vision of a 15 Minute City. Modal change will be achieved if people can access reliable and efficient public transport within 15 Minutes of their home to commute to work or to access the wider city and communities. Therefore 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 the DART Expansion Programme, Luas expansion, MetroLink, BusConnects, and the Greater Dublin Area Cycle Network Plan. While the expansion of the DART and Luas will have little impact on transport provision in the city centre they should directly impact on levels of traffic congestion. The orbital rethink of the bus network in the BusConnects plan, along with the provision of significant cycling infrastructure could prove transformative for the city centre, in particular for key transport corridors such as O'Connell Street and Dame Street. Our public transport system is at capacity at commuter times and with new social distancing restrictions in place, the capacity of busses and trains is reduced significantly. Investment is needed to complete these vital transport projects, particularly the MetroLink, for Dublin City to ease congestion, enable modal change and achieve the vision of a 15 Minute City.

Active travel, which is vital to delivering the 15 Minute City and also contribute to the cities wider health objectives, should be supported across Dublin. This will require ambitious investment in cycling infrastructure and improvement of the public realm to support pedestrians. Dublin City 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 Dublin City should be gradually reduced on a phased basis to reflect and encourage modal shift to public transport and

¹⁰ <https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Submission-on-the-NTA-Review-of-the-Transport-Strategy-for-the-Greater-Dublin-Area.pdf>

active travel. Car parking should also be future proofed to accommodate electric vehicles. Other parking 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.

Economic Development and Employment

As outlined in the consultation document, Dublin City and indeed the National economic outlook is currently uncertain with the long-term impacts of Covid-19, Brexit and indeed Climate Change presenting significant challenges. Dublin City represents a key component of the national economy and performs an important role in ensuring the continued international competitiveness of the Dublin region. Both the NPF and RSES highlight the importance of employment within Dublin City and the new Development Plan must build on this by creating the right conditions for the creation of quality jobs in the right locations. Docklands, Poolbeg, and North East Inner City are identified as areas for significant employment development within Dublin City.

The Covid-19 crisis has also had a significant impact on the way we work, which in turn impacts on the way we commute and move around the city. Remote working and flexible working practices will have a significant impact on transport infrastructure, its capacity and on the local economy as people spend more time, and money, in their local communities and town centres. Town centres and a thriving local economy are a vital feature of the 15 Minute City. These hubs are vibrant parts of the community, where people shop, work, meet, relax and live. The Development Plan should examine how these urban centres currently meet the needs of those living locally and work to address any imbalances, particularly how they respond to the changes and challenges of more remote and flexible working practices. Town centres or hubs need to provide a range of services to ensure mixed-use development, including retail, commercial and residential. The town centre should have excellent public spaces and public realm and be centred on pedestrian-first policy. They must also be well connected to other central hubs or town centres through a range of public transport options.

Revitalising Town and City centres

Globally, cities are constantly being challenged to innovate and compete to attract both people and investment. With the significant population growth expected in the Dublin region in the coming years and an increasing urban population nationally, there is a demand to address the factors that will sustain that urban future. In planning and developing Dublin much of the focus has understandably centred on the need to accelerate housing delivery or address congestion issues. However, the economic impact of the Covid-19 crisis has changed that conversation and highlighted the broader challenges that face Dublin city centre. The crisis has highlighted the structural fragility of our urban centres, with the retail and hospitality sectors severely impacted as the periods of lockdown and restrictions have repeatedly emptied out our city centre. Better planning will not provide all the answers for cities impacted by Covid-19, but it has a significant role to play in creating a positive framework for delivering viable urban centres.

In order to become more sustainable and resilient Dublin must embrace the model of mixed development and hyper proximity as outlined in Dublin Chamber's *Dublin: The 15 Minute*

City report.¹¹ In order to revitalise our urban centres the government should focus on developing a scheme that encourages high-quality, mixed urban centre living. International trends were already pointing in this direction before the pandemic. In surveying carried out by Savills UK last year, the majority of landlords had reported considering re-purposing high street and shopping centre assets over the last few years as they looked to deliver alternatives to retail usage, with a particular focus on residential redevelopment, offering higher value.¹²

In the past year, the retail industry has seen an unprecedented level of change, particularly in regards to digitalisation and the world of online shopping. The fear for many retailers is that in one year they have experienced up to five years of change, what if they continue to experience this level of change into the future and the policy and development plans lack the ambition and ability to be able to respond at pace. Flexibility, ambition, and cutting edge need to be at the forefront of our retail strategy if the city is to respond appropriately to the significant challenges. City centre retail of the future will focus on the need to be experiential¹³ in order to compete with the world of online shopping. The city's development plan should respond in kind and ensure that the 'experience' of the city centre is developed and enhanced. Public realm plays a significant role in the feel and flow of our urban centres and there is need to focus on enhancing this. Particularly in looking at the full experience, not just Grafton Street or Henry Street in isolation, but how do we access these spaces from public transport, what is that journey like.

In developing a positive framework for the revitalisation of our urban spaces the following approaches should be considered:

- Consideration of the guiding principles of hyper-proximity and the 15 Minute City vision in the upcoming reviews of Dublin's four local authority Development Plans.
- The setting of ambitious minimum densities, in line with Dublin's targets for compact growth, for residential and commercial development in our urban centers.
- Pedestrian-first planning to enhance the permeability of public spaces, creating a walkable city that supports inclusive, vibrant, and healthy communities.
- Significant capital investment in transport infrastructure, including the delivery of key projects such as BusConnects, MetroLink, Luas and DART expansion, and implementation of the Greater Dublin Area Cycle Network Plan

Live above the shop measures

The consequences of failing to introduce effective policies that promote over the shop living and integrate more residential developments into our city centre have been brought into sharp focus by the impact of Covid-19 and the absence of both commuters and tourists. A recent NESC report on housing policy outlines that one of the significant barriers facing the conversion of unused commercial space or above the shop premises to residential use is the

¹¹ Dublin Chamber, *Dublin: The 15 Minute City*, https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin_The-15-Minute-City.pdf

¹² <https://www.savills.ie/research-and-news/savills-news/300108/post-covid-19---planning-for-town-centres>

¹³ <https://www.irishtimes.com/news/consumer/what-on-earth-is-experiential-shopping-and-should-we-care-1.3244051>

complexity of the multiple regulatory processes required.¹⁴ Such policies provide barriers, both architecturally and financially, to the conversion of such units. Dublin City Council should work in partnership with developers and the private sector to identify blockages and to bring more projects to completion. There is a need for flexibility and a regulatory approach that looks at the merits of individual projects, even if they do not meet all the current strict guidelines. This is particularly important in ensuring more residential conversion in historic parts of the city while protecting and maintaining urban heritage.

To promote delivery of increased residential space within our urban centres the following should be considered:

- Reform of the statutory building control requirements in historic urban centres to encourage greater conversion and use. If a statutory building control requirement presents a significant and unworkable barrier to such developments, the land owner, builder or developer should have the ability to apply for a specific exemption on grounds of the unique difficulties presented by the retro fitting of old and historic buildings in the circumstances of the project.
- Many businesses view the risks associated with above the shop conversion as too costly, from the closure of the premises for several week or months for conversion, to the potential impact on trade, and insurance if incidents occur. The Covid-19 crisis has accelerated long run trends in terms of the changing role and function of the main street and key retail centres. However, as vacancies arise in some retail premises there will be an opportunity to encourage land owners to consider conversion of above the shop space. To take advantage of this opportunity, and to promote increased residential space within the city centre, targeted grants should be introduced.
- Reform of the Living City Initiative to include the option of an upfront grant as an alternative to the tax relief currently offered. Particularly given the financial circumstances facing many retailers post-pandemic.
- The Planning and Development (Amendment) (No.2) Regulations 2018 introduced an exemption for planning permission to vacant commercial premises, including vacant over the shop spaces, where there is a proposed change of use to residential. Dublin Chamber proposes two changes. In light of the Covid-19 crisis Dublin Chamber suggests that the requirement for the premises to have laid vacant for at least two years immediately prior be waved for above the shop premises. This is to enable landlords that would have not normally considered the project financially viable the opportunity to transform the space while their retail unit is vacant.

Safety and Public Realm

We know from previous research, including Dublin Chamber's award-winning Global Reputation Project and Vision for Dublin 2050, how important safety is in enhancing Dublin's reputation. The Global Reputation report found that fewer than a third of respondents would

¹⁴ http://files.nesc.ie/nesc_reports/en/150_Housing_Policy.pdf

describe Dublin as a safe city, while one in seven believe it is not safe.¹⁵ During the current covid-19 restrictions this situation has significantly deteriorated and has been pulled into sharp focus.¹⁶ In a recent Dublin Chamber focus group with retailers they expressed the significant safety and security issues that they are currently facing and expressed alarm in the damage this is doing to the reputation of the city centre as a safe and enjoyable space to visit. In revitalising the city centre post-covid-19 and the ambition to grow the city's night-time economy, the Chamber recognises that significant investment will be needed in ensuring that our streets and spaces are and feel safe. Improvements to the public realm can play a significant role in how safe people perceive an area to be; excellent street lighting, open spaces and pedestrian-focused spaces enhance the city's overall look and feel, as well as its safety. Specific investment and co-ordination in terms of greater street policing and CCTV should also be examined.

The City's Night-Time Economy

Last year Dublin Chamber welcomed the establishment of the Night-time Economy Taskforce and subsequent consultation and the renewed focus on this part of cities economy. The recent announcement of the Outdoor Public Space Scheme 2021 is positive move in a direction towards enhanced funding opportunities and focus on arts and cultural spaces at a local level.¹⁷ Mercer Global's City Attractiveness Index highlights 'the appeal of cities as a place to live, work and visit is a key aspect of a city's attractiveness and should be seen as the most important pre-condition for the future economic success of the city'.¹⁸ A thriving and diverse night-time economy is vital if that vision is to be realised in Dublin. The night-time economy is a key aspect of life in Dublin, as the city is home to world famous theatres and bars and is internationally known as a great city to visit.¹⁹ However, Dublin Chamber recognises that the current regulations, licensing laws, restrictions and lack of supportive infrastructure have resulted in the night-time economy not being able to achieve its full potential. The Chamber also recognises the challenges that the night-time economy and art and culture spaces have faced in recent years. With space in the city in high demand many cultural spaces and night-time economy venues have experienced the disadvantages of development, particularly in a city that has not prioritised the need for informal and cultural spaces. Our Dublin: The 15 Minute City report seeks to address this imbalance in development and calls for mixed development to be brought to the fore. The Chamber recognises the need for these spaces and sees them as a necessary part of what makes a city successful and liveable.

A thriving night-time economy would help the city to enhance its offering for its residents, and establish it as an excellent place to live, study, visit and to work in. In order to achieve this, Dublin needs to be ambitious and forward-thinking in planning to reform the night-time economy, with expanded late night offerings, enhanced public transport and a thriving late-

¹⁵ Dublin Chamber, Dublin's Global Reputation Report, <https://www.dublinchamber.ie/getattachment/Business-Agenda/Dublin-s-Global-Reputation/Dublin-s-GlobalReputation-Report.pdf?lang=en-IE>

¹⁶ <https://www.irishtimes.com/news/crime-and-law/i-ll-blow-your-f-king-legs-off-crime-and-neglect-in-dublin-city-centre-1.4483079>

¹⁷ <https://www.gov.ie/en/press-release/14d5d-re-imagining-our-outdoor-public-spaces/>

¹⁸ Mercer Global, City Attractiveness Index, <https://www.mercer.com/what-we-do/workforce-and-careers/cityattractiveness-index.html>

¹⁹ Dublin Chamber, Dublin's Global Reputation Report,

night industry. Dublin City should strive towards becoming a 24-hour city that is open to all: a city that embraces its culture, night-life, entertainment and multi-culturalism while not losing sight of its unique character. The Covid-19 crisis has been devastating to the many and varied industries that operate in the night-time economy. However, as the economy opens up and restrictions are lifted, the industries and actors involved in this space need to be ready to not only bounce-back to pre-Covid levels, but to enable them to grow and develop a strong and vibrant night-time economy in our city. The Chamber recommends the following options be explored in realising the vision of a 24 hour city and successful night-time economy:

- An ambitious and forward-looking approach to the changing of national licensing laws and regulations to achieve the vision of a modern 24-hour city;
- Supporting innovative thinking and policy creativity through pilot programmes and trials to establish learnings as we grow the night-time economy;
- Ensuring that the supporting infrastructure required to enhance the night-time economy is in place;
- Supporting significantly enhanced late-night public transport offerings and increased introduction of 24-hour services where necessary;
- Ambitious re-thinking in relation to our cities' public and civic spaces and how they could be used to enhance the night-time economy;
- Establishment of a Dublin Night Mayor/Czar or Night-Time Commission whose role is promote, co-ordinate and enhance the night-time economy;
- Establishment of a fund to promote and increase engagement in the night-time economy from the arts and culture sectors;
- Recognition of the role that the public realm plays in ensuring safe open spaces and ensuring that services, such as street policing and CCTV are invested in to improve safety in the city.

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. Dublin City 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.

Recommendations

The consultation on the Development Plan comes at a critical time for Dublin City 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 advocates that the Dublin City Development Plan take on board the principles of a 15 Minute City and incorporate them into its Development Plan. Dublin City is constrained by the limited availability of greenfield sites and therefore must make the most from remaining sites and brownfield development. Compact growth, high density and height should all be to the fore. The 15 Minute City vision can provide a lens through which to focus planning and the tools to regenerate existing communities.

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, Dublin City will be unable to meet its compact growth and brownfield regeneration targets.

Dublin Chamber acknowledges the significant challenges that Dublin City 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 the city and its transition to a low carbon, climate resilient, and high-density city playing an integral role in the Dublin region.

In particular, we call on the Dublin City Development Plan to commit to:

- Commitment to the guiding principles of hyper-proximity and the 15 Minute City vision in the Development Plan
- Establishment of a 15 Minute City pilot programme to establish learnings and identify implementation issues arising from such an ambitious plan.
- Use of the Local Area Plan and Strategic Development Zone models to deliver the 15 Minute City vision and to encourage further development and regeneration in built parts of the city.
- 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.
- Develop appropriate criteria for the provision of height and density that focuses on spatial and infrastructure requirements.
- Ensuring the development of enabling infrastructure to unlock key housing sites in order to meet the needs of Dublin City's growing population.
- Development and regeneration of town centres and urban hubs through careful planning and a high quality public realm.
- A review to identify parts of Dublin City that have a particular shortage of facilities essential to creating a 15 Minute City, particularly greenspace and public transport.

- Integration and consideration of community needs into planning conditions and zoning.
- Renewed focus on retail and the night-time economy in city centre. These sectors have experienced unprecedented levels of change and need to be supported.
- Consideration of partnerships between industry and communities to develop mixed-use spaces.
- Pedestrian-first planning to enhance the permeability of our public spaces, creating a walkable city that supports the delivery of inclusive, vibrant and healthy communities.
- Significant capital investment in transport infrastructure, including the delivery of key projects for Dublin City such as BusConnects and the MetroLink.
- Accelerating investment in and delivery of the Greater Dublin Area Cycle Network Plan.
- A focus on mixed-housing developments, increasing population density and embracing the principle of compact growth and brownfield regeneration.
- Co-ordination with the rest of the Dublin Metropolitan Area to ensure consistency in planning and development across the four Local Authorities.