



Submission on South Dublin County Development Plan 2022-2028 Pre-Draft Consultation

September 2020

Dublin Chamber is the representative body for businesses across the Greater Dublin Area, with a cross-sectoral membership base spanning the spectrum from small start-ups to major multinationals. The Chamber is committed to improving the business environment and quality of life in the region, and welcomes the opportunity to comment on the South Dublin County Development Plan 2022-2028 pre-draft consultation. The South Dublin Development Plan 2022-2028 will set 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.

Priorities for the Development Plan

In the four years since the adoption of the current South Dublin County Development Plan 2016-22 the region has experienced significant changes. South Dublin has seen considerable growth, both economic and demographic, and the new plan must reflect these trends. In a wider planning context, South Dublin is a critical part of the Dublin Metropolitan Area. A key priority for the Development Plan will be managing and co-ordinating the predicted population growth as South Dublin moves towards an additional 80,000 people and the delivery of 32,000 new homes by 2040. With infrastructure pressures, particularly on housing and transport, presenting significant challenges for the whole region, South Dublin will play a vital role in the future development and growth of the Dublin Metropolitan Area.

The Chamber strongly supports a vision of sustainability, compact growth, urban density, and brownfield regeneration contained in the National Development Plan (NPF). 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 NPF,¹ the Regional Spatial and Economic Strategy (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.

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

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

Delivering a 15 Minute City for Dublin

With quality of life in mind, and based on the insights brought by the Covid-19 crisis, the Chamber recently published its *Dublin: The 15 Minute City* report.³ 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.

By creating a 15 Minute City, 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 South Dublin and the Dublin region 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.

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 South Dublin. 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.

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. 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.

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

³ Dublin: The 15 Minute City, https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin_The-15-Minute-City.pdf

the development of strategic employment areas as well as growth in employment in the county.

South Dublin 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. At present, 85% of housing in South Dublin is detached/semi detached, which indicates significant areas of low-density housing and urban sprawl. The Urban Development and Building Height Guidelines,⁴ 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.⁵

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).⁶ The Adamstown SDZ has similar potential and the recent success from SDCC in securing funding through the Local Infrastructure Housing Activation Funds is an endorsement of the potential of this area.

The issues paper has earmarked areas such as Adamstown, Clonburris, Tallaght, and Naas Road for strategic development and regeneration. These 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 regarding high density development and brownfield regeneration. South Dublin has the advantage of still possessing key greenfield 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. 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.

Adequate infrastructure for a growing population

Dublin as a whole is growing both economically and in terms of population. Ireland's future depends on its successful management of the urbanisation process, and we must focus efforts on compact growth to accommodate more people within the existing footprint of the metropolitan area. South Dublin's population was 278,767 in 2016 and this is expected to

⁴ 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

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

⁶ Irish Planning Institute, <https://www.ipi.ie/news/latest-news-press-releases/dublin-docklands-scheme-wins-planning-award>

rise to 329,000 by 2031, representing an addition of almost 50,000 people.⁷ 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 strategic issues document, SDCC 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.

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.⁸ 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 and to delivering the vision of a 15 Minute City.

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 will be 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. By ensuring an appropriate mix of housing, more sustainable communities are created. SDCC has a below-average number of flats/apartments at 14% of the housing stock, with the regional figure at 18%. This needs to be addressed in the new development plan, particularly through developing brownfield sites and strategic development areas where increased height is particularly appropriate.

The consultation issues paper has a particular focus 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, 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

⁷ South Dublin County Development Plan, Strategic Issues 2022 – 2028, <https://sdcc.ie/en/devplan2022/related-plans/south-dublin-issues-paper-2022-2028.pdf>

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

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

South Dublin 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 Dublin region faces, particularly in areas such as transport, housing, amenities, sustainability and liveability.⁹ 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 South Dublin include:¹⁰

1. South-West Corridor; Dart Expansion and Luas Red Line
2. City Centre within the M50; Naas Road Redevelopment
3. Identified urban growth areas including Clonburris, Kilcarbery, Adamstown, Grangecastle and Fortunestown.
4. Brownfield regeneration at Naas Road and Tallaght

In previous county Development Plans and Local Area Plans, the lack of infrastructure is often cited as a reason certain areas to be designated as low density. Due to the rate of expected population growth in South Dublin, 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 South Dublin. 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, Dublin City, Fingal, Kildare and Wicklow Local Authorities is essential in these areas.

The Naas Road area has been identified in the 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.

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

¹⁰ Eastern Midlands Regional Authority, https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf

Sustainable Movement & Transportation

The development of significant transport projects within the county represents the greatest opportunity for the Development Plan as these will serve as enablers of sustainable economic, social and population growth for South Dublin. 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 is reasonably ambitious in terms of projects and delivery.¹¹ The MASP echoes this strategy.

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, BusConnects, and the Greater Dublin Area Cycle Network Plan. In particular, the Luas and DART Expansion¹² will be key enablers of growth and will provide the transport capacity to unlock key sites for development in South Dublin. Our public transport system was already at capacity at peak commuting times pre-Covid-19, and with social distancing restrictions in place, capacity has been reduced significantly. Investment is needed to complete these vital transport projects for South Dublin to ease congestion, enable modal change, and achieve the vision of a 15 Minute City.

Active travel, which is vital to the 15 Minute City vision, should be supported across Dublin. This will require ambitious investment in cycling infrastructure and improvement of the public realm to support pedestrians. South Dublin 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 level of car parking space within South Dublin should be gradually reduced on a phased basis to reflect modal shift to public transport and 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 spaces as appropriate.

¹¹ National Transport Authority, https://www.nationaltransport.ie/wp-content/uploads/2016/08/Transport_Strategy_for_the_Greater_Dublin_Area_2016-2035.pdf

¹² Irish Rail, <https://www.irishrail.ie/Admin/IrishRail/media/Content/DART-brochure.PDF>

Economic Development and Employment

The current economic outlook is uncertain with both Covid-19 and the potential impact of Brexit presenting significant challenges. South Dublin 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 South Dublin, and the new Development Plan must build on this by creating the right conditions for the continued creation of quality jobs in the right locations. Tallaght, the Naas Road, Adamstown, Grange Castle and Clonburris are identified as areas for significant employment development within South Dublin.

The Covid-19 crisis has also had a significant impact on the way people work, which in turn impacts on the way they commute and move around the city. Remote working and flexible working practices will have a significant impact on transport infrastructure 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 South Dublin County Development Plan should examine how these town centres currently meet the needs of those living locally and work to address any imbalances, particularly in 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.

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 is sustainable. 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 to assist in the 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. South Dublin County Council should work proactively with Irish Water to progress and deliver vital infrastructure projects, including the proposed new water reservoir at Peamount, 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 also heed 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 an critical time for South County 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 calls for the South Dublin County Development Plan to take on board the principles of a 15 Minute City and incorporate them into its Development Plan. South Dublin has particularly suffered from low density urban sprawl in the past, and the 15 Minute City vision can help to transform affected areas.

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

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

Dublin Chamber recommends the following for the South Dublin County Development Plan:

- 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.
- Planning policies to achieve compact growth, brownfield regeneration, and high-density development.
- Ensuring the development of enabling infrastructure to meet the needs of South Dublin'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 South Dublin that have a particular shortage of the facilities essential to creating a 15 Minute City, particularly greenspace and public transport.
- Integration and consideration of community needs into planning conditions and zoning.
- 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 county that supports inclusive, vibrant and healthy communities.
- Support for necessary transport infrastructure projects including BusConnects and the Luas and DART expansions.

- Accelerating investment in and delivery of the Greater Dublin Area Cycle Network Plan.
- A focus on mixed-housing developments, increased 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.