

Uimhir Thagarta Uathúil: SD-C226-55

Stádas: Submitted

Submission:

Proposed Material Amendments to the Draft South Dublin
County Development Plan - AmCham Submission

Údar: American Chamber of Commerce
Ireland

Comhairliúchán:

Proposed Material Amendments to the Draft South Dublin
County Development Plan

Dáta a cuireadh isteach: 26.04.2022 -
17:18

Litir Chumhdaigh

The American Chamber of Commerce Ireland (AmCham) is the collective voice of US companies in Ireland and the leading international business organisation supporting the Transatlantic business relationship. Our members are the Irish operations of all the major US companies in every sector present here, Irish companies with operations in the United States and organisations with close linkages to US-Ireland trade and Investment.

AmCham welcomes the opportunity to make a submission to South Dublin County Council's public consultation on the Proposed Material Amendments to the Draft South Dublin County Development Plan.

Observations:

Chapter 7: Sustainable Movement

Caibidil: Volume 1 » Chapter 7: Sustainable Movement

Select Proposed Amendment on which you are commenting: Amendment 7.3, Amendment 7.9

With regard to amendments 7.3 and 7.9, AmCham acknowledges the focus on sustainable movement. Sustainable and reliable public transport and mobility solutions will be important in terms of achieving carbon neutrality and also in relation to ensuring South Dublin remains an attractive location in which to live and work.

AmCham advocates for the delivery of key transport projects, such as BusConnects and the expansion of Luas services. Furthermore, in supporting sustainable mobility, and in supporting Dublin's urban villages, AmCham supports the balanced expansion of cycling and walking infrastructure, with the facilitation of safe cycling and walking, in conjunction with other transport options, being paramount. This is also essential in the context of supporting multi-modal transport options.

AmCham acknowledges the amendment to "to support micro-mobility in line with legislative/statutory requirements." The inclusion of micro-mobility solutions as part of the integration of various transport systems would be beneficial for many, particularly in better facilitating the first, and last, mile of a commuter's journey.

In ensuring Dublin is a great place to both live and work, it is key that the transport system includes access to shared and public transport. Ensuring reliable and sustainable transport solutions are more widely supported is essential as society moves towards carbon neutrality, and in supporting sustainable transport solutions as a viable, and preferable transport option for the population.

Chapter 8: Community Infrastructure and Open Space

Caibidil: Volume 1 » Chapter 8: Community Infrastructure and Open Space

Select Proposed Amendment on which you are commenting: Amendment 8.3, Amendment 8.6, Amendment 8.8

With regard to amendments 8.3, 8.6 and 8.8, AmCham acknowledges the focus on the promotion of sport within the South Dublin County Council Development Plan. Continued investment, in AmCham's view, in sport infrastructure, including recreational facilities, will be vital in supporting local communities both physically and mentally. Sport has a brilliant ability in bringing together and uniting people from different communities and backgrounds. Maximising access to recreational sport should be advanced with ongoing investment into the future.

AmCham supports the development of community infrastructure which enhances Dublin's attractiveness as a destination of choice for people to come to Ireland to live and work. Through ongoing support for sport, cultural and community infrastructure, the opportunity exists to further enhance the multicultural and multilingual aspects of Dublin's attractiveness. This can be advanced by acknowledging the importance of Ireland's rich cultural heritage and how integrating other cultures will enhance the community feeling for those who move here.

Chapter 11: Infrastructure and Environmental Services

Caibidil: Volume 1 » Chapter 11: Infrastructure and Environmental Serv...

Select Proposed Amendment on which you are commenting: Amendment 11.7

Electricity infrastructure is an important consideration within the South Dublin County Council Development Plan. In this context, AmCham believes the insertion of a new section 'Policy and Objectives 11.5 Electricity Infrastructure' as proposed may be beneficial (amendment 11.7).

The policy outlined to "protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments" would be positive for business and citizens in ensuring advancements are supported to provide for greater energy capacity and security into the future.

Ensuring energy infrastructure is in place to provide for growth within communities across South Dublin, and which factors into the wider infrastructural needs of the region and country will be important in ensuring Dublin remains an attractive location for inward investment.

Objectives outlined in this section, including to support micro grid development, the sustainable development of offshore renewable energy resources, and the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and support the transmission of renewable energy focused generation will be positive in supporting Ireland's overall climate goals.

AmCham fully supports the Government's commitment to transition to a carbon neutral economy by 2050, as well as the EU's increased decarbonisation target of 55% emission reductions by 2030. Many AmCham members are aligned to more ambitious sustainability targets.

Chapter 13: Implementation and Monitoring

Caibidil: Volume 1 » Chapter 13: Implementation and Monitoring

Select Proposed Amendment on which you are commenting: Amendment 13.1, Amendment 13.2, Amendment 13.3

In relation to the proposed amendments relating to land zoning objectives (13.1, 13.2 and 13.3), AmCham is of the view that decisions related to the significant capital technical infrastructure would be best taken at a national level, and in the context of the wider infrastructural capacity and need. As such, it may be beneficial to categorise data centre projects in the 'to be considered' category, given the potential impact that the inclusion of these amendments in the final South Dublin County Council Development Plan may have.

AmCham notes that projects related to significant capital technical infrastructure prove to be beneficial for communities with regard to job creation and support for the local economy. Such projects represent substantial investment and provide both direct and indirect employment in local communities and in the wider region. In South Dublin, as in other regions, such investments have provided economic benefit to the local economy in the context of direct employment, during construction, and resulting from the services provided following their development. Such investments have also resulted in indirect benefits, supporting the attraction of additional commercial investments into the region.

The local benefits of significant tech investments, the continued attractiveness of South Dublin as an investment location, and the direct and indirect employment, are key factors in relation to the consideration of these amendments.

Ensuring decisions related to such projects are taken with a view to the overall infrastructural framework will be important in supporting employment creation and local investment, while balancing these factors with the wider infrastructural framework.

AmCham acknowledges the importance of ensuring Dublin's continued attractiveness as a location for inward investment. Noting safeguards which exist within the planning process, and actions to support the flow of power through our electricity grid and to plan and provide for future power supply, AmCham is of the view that decision-making as to the appropriate location for the development of significant capital technical infrastructure can most effectively be made through the lens of wider regional and national needs. The consideration of these amendments may wish to examine any adverse impact they may have in terms of the local area's continued attractiveness for significant tech investments, and in the context of the wider local community, economic, and employment creation benefits.

An approach which supports a national focus in making relevant determinations would also ensure decisions are made with an understanding of both local and national considerations, allowing for the most appropriate decision, not only for local communities, but also for Dublin region, and Ireland as a whole, ensuring such decisions are aligned with national investment and planning policies.

Teorainneacha Gafa ar an léarscáil: Níl