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Response to Dublin Development Plan 2022-28

January 2022



Executive Summary

1. DublinTown agrees with the broad thrust of the draft Dublin Development Plan. In many respects it mirrors our own ambition for the city's commercial core as detailed in the DublinTown renewal plan [DublinTown-Renewal-Document-2023-2027.pdf](#) ([wearedublinton.ie](#)).
2. The 2020's will define the 21st century. This is a time of unprecedented change driven by the technological revolution and the need to address climate change. The response to Covid showed that society can change rapidly, dramatically and in unison when required. Climate change will also require us to transform how we live and work. The current plan needs to effect the changes required to ensure that Dublin remains relevant to residents and visitors, is climate sustainable and can attract investment. Achieving this will require a level of public-private engagement never seen before. DublinTown will facilitate engagement with businesses and bring our international experience, data, research and insights to the table.
3. The core city will see increased residential use in the coming years. The city's Evening & Night Time Economy (ENTE) will continue to grow. Potential conflict between residents and night time businesses can be avoided where we learn from international experience and utilise our Purple Flag structures.
4. It is important for city centre vibrancy that we strike the right balance between residential and commercial uses. We must retain commercial uses at ground floor. We should learn from the detrimental impacts of the UK's [Protected Development Rights](#) which led to unplanned residential development undermining commercial viability.
5. The pandemic demonstrated the interplay between the city's economic sectors. The loss of office workers was acutely felt by retail and hospitality businesses. Similarly, the closure of hospitality businesses significantly impacted retailers. This reflects how people use Dublin city. Our research shows that more people dine than shop in Dublin city centre. However, retail is by far the most dominant land use. This is likely to remain the case for some time. Retail has a future in the city if it is protected and promoted. We believe that Category 1 and 2 retail street designation is now obsolete. We do not support the clustering of food and beverage businesses. Instead, we need multi-use streets where there is a good balance of different business types.
6. We support active land management in the pursuit of a compact and integrated city. This includes the use of brownfield sites and the Vacant Site levy. We would welcome [Compulsory Sales Orders](#) to address wilful neglect and persistent under-utilisation of city centre sites. This could require national legislation and perhaps constitutional change.
7. While we understand the motivation to grow trade in urban villages, we do not believe that the "15 minute city" model is feasible for Dublin given its dispersed nature. There are too many suburban villages, across several local authority areas, with insufficient populations in each to support the diversity of offer required by modern consumers. These urban villages are unlikely to be able to sustain the levels of employment required for success. We do not see the office hub/co-working spaces within local centres as a practical solution. Such hubs ignore the core strength of the office environment in creating multi-disciplinary teams and training new staff.

8. DublinTown supports the Living City initiative as it:
 - a. Utilises vacant/semi-vacant spaces which may be in danger of dereliction
 - b. Provides accommodation which supports active travel to work and education
 - c. Provides evening and off-peak activity on city streets, enhancing perceptions of safety and augmenting the city's customer base.

We will work with all parties to help strengthen the scheme to secure a better take up by property owners.

9. Addressing Climate Change is probably the greatest challenge that mankind has faced. The target emission reductions of 40% by 2030 is tough but must be achieved. If renewed for a further term DublinTown will establish a Sustainability Committee and will work closely with Dublin City Council, national Government and members to help achieve the necessary carbon reductions. A collective and co-ordinated effort will be required to reach the specified targets. The DublinTown committee will focus on:
 - a. Training using DCC MODOS and other programmes
 - b. Encouraging energy conservation including insulation and retrofitting
 - c. Promoting micro-energy generation where applicable
 - d. Promoting shared last mile and shared home delivery services using electric vehicles
 - e. Promoting the use of flat rooves for urban farms and hydroponics to serve local restaurants
 - f. Support district heating where appropriate
 - g. Promoting green infrastructure including green walls and roofs to stall water egress into the city drainage system
 - h. Encouraging rainwater harvesting and water conservation
 - i. Promoting the use of parklets and green dwell zones to encourage increased dwell time and provide meeting spaces within the city
 - j. Support tree planting to assist with carbon capture while creating a more welcoming environment.
 - k. Seek sustainable and timely waste collection from business premises and segregated public waste bins on city streets.
10. UK research highlights the waste averse profile of many Gen Z's (that age group in their late teens and early 20s). Post pandemic we will need to encourage reusables, such as keep cups, as part of the customer experience. This makes economic and environmental sense.
11. Reducing transport emissions is essential in addressing climate change. Pre-pandemic almost 80% of city customers chose sustainable modes of transport, almost 80% of out-of-town shoppers drove to their destination. We should promote the city's sustainability credentials in our marketing. The NTA's Dublin plan 2022-2042 contains most of the measures required to reduce transport emissions, however, the time scale for delivery is simply too long and must be consolidated. DublinTown believes that sustainable transport should be promoted in preference to electric vehicles. We further believe that recharging should be housed within multi-story car parks rather than utilising valuable kerb side space.
12. The city's cultural offering attracts more visits than ever before. In Ireland and abroad the public increasingly support the preservation of cultural uses as well as the preservation of physical buildings. Unique offerings help define a city or district's identity and help establish its brand. DublinTown supports the agent of change principle which protects venues that encourage ancillary investment and increased engagement with a district.

13. The [Creative Quarter](#) experience is relevant to addressing vacancy. Young entrepreneurs acquired space on short term licenses at competitive rents. They developed strong business offerings, many of which are still active today. The district developed an independent identity which attracted further diverse uses which in turn increased footfall to the benefit of all.
14. DublinTown welcomes the Council's commitment to investment in the public realm. There is an ever-increasing number of people who use the city as a meeting point and we believe that this should be supported. The recent vacancy summit (December 2021) hosted by the Lord Mayor demonstrated that the Council and property/business interests share a broadly similar vision for the city's future. Increased collaboration will be to the benefit of all.
15. DublinTown supports proposals for the redevelopment of Moore Street, Liffey Street and Wolfe Tone Square. We see scope for the development of a night market on Moore Street which will support the development of the city's ENTE. The increased activity would help address perceptions of safety at night. Other cities have used such markets to promote local arts, crafts and design. We believe that there is scope to work with the Crafts Council and Visual Artists Ireland in the development of these concepts and assisting local artisan producers to find avenues to market.
16. We believe that the creation of a cultural quarter on Parnell Square will create synergies with new and expanded uses in the Dublin One District. We believe that the Dublin Central proposals will create links between Parnell Square and the core city centre to the benefit of both locations. We further believe that we can use the opportunity for cultural uses on Talbot Street and Marlborough Street which will connect to the proposed redeveloped Abbey Theatre. We believe that there is scope for developing artist spaces on the upper floors of Talbot Street with gallery uses at ground level. We would see potential for the further development of unique craft work and design in this context also. This would provide new and sustainable footfall in the area. It would also enable us to utilise the district for the development of cultural events. In this context, we would welcome the opening up of the Department of Education grounds for public use, open air screenings and engagement.
17. DublinTown believes that a common sense rather than ideological approach should be adopted when it comes to building height.
18. DublinTown supports development, including residential development in the Docklands. We further welcome the strengthening of connections between the docklands/port area and the city centre. We believe that the Luas Red line should be extended to meet a purpose built passenger terminal in the port, thus connecting sea passengers to Busáras and Connolly and Heuston rail stations.
19. While accepting that Data Centres consume large amounts of energy, it must also be accepted that data and its processing is likely to be a significant economic factor in the 21st century economy. Therefore, it would be unwise to jettison a policy of facilitating data centres without thorough consideration of their energy needs in the context of total energy generation, together with a related assessment as to how these energy needs can be met.
20. Hotel development pre-pandemic was bringing supply and demand for tourist accommodation back into balance. The fact that this development was centred north of the river will help establish a critical mass of hospitality businesses in Dublin One and an enhanced customer base for newly developed attractions. Dublin was not over-touristed in 2019 and therefore, there is scope for welcoming increased tourist numbers without placing excessive pressure on our tourism and related infrastructure.
21. It will come as no surprise that DublinTown agrees that out of town retail developments, which are car dependent, should not be supported. The city's strength is derived from the

diversity of its offer and the interconnectedness between the various sectors. DublinTown will utilise this key strength in its messaging to the public and will work with all relevant stakeholders including Dublin City Council to amplify it.

22. DublinTown supports the city's [laneway strategy](#) which has its roots in the Dublin One project and which we believe will bring new opportunities and life to city centre districts.
23. The city has a significant amount of clutter on its streets. We propose a full audit of signs and street furniture to help us create an enhanced ambience in the city.
24. DublinTown believes that we should have 24 hour manned public toilets with a cost of c.€1 to use. Such facilities are successfully provided on the continent. They could be supplied here together with the use of a concierge service.
25. DublinTown supports a levy payable by private and public sector employers on car parking provided free to employees within Dublin city. This will help reduce traffic congestion particularly at peak periods. Similarly, employees should be incentivised to use public transport rather than using their private cars for work purposes. Money raised from such a levy could be ringfenced to support initiatives around public transport and/or cycle and pedestrian infrastructure.
26. Waste management is a significant issue for many businesses. The process is costly and the presentation of waste in the evening is unsightly. This is a significant issue for businesses who trade in the ENTE. General city cleanliness has reduced since the Council outsourced waste collection. There have been calls to re-instate Council collections for domestic customers. DublinTown advocates a similar approach for commercial collections within Dublin city centre.
27. There is a clear imperative to encourage conservation and recycling. There is also a need to promote re-use. While re-use was shunned during the pandemic, in the era of sustainability this is a trend that we are likely to see resurfacing.

DublinTown

Response to Dublin Development Plan: 2022-2028

Introduction

DublinTown is pleased to make this response to the Dublin Development Plan 2023-2028. DublinTown agrees with the broad thrust of the plan. Indeed, in many respects it mirrors our own ambition for the city's core commercial district as detailed in our 2023-2027 plan [DublinTown-Renewal-Document-2023-2027.pdf \(wearedublincity.ie\)](https://www.wearedublincity.ie/DublinTown-Renewal-Document-2023-2027.pdf).

Our submission is informed by key DublinTown insights.

DublinTown believes that:

1. The 2020's will be a defining decade for the coming era
2. In this decade we will see fundamental shifts in people's priorities and how we live our lives and use our cities
3. The era will be framed by a technological revolution and adaptation to climate change
 - a. Economic success is dependent on climate sustainability
 - b. Customers increasingly expect businesses to share their values. Their spending preferences will be determined accordingly
 - c. People changed rapidly and in unison in response to Covid. They can be persuaded to do so again in response to climate change.
4. The pandemic will end. People will once again wish to make the most of their lives.
 - a. Covid responses such as work from home and staying local may reverse as people once again feel comfortable using public transport and visiting the city.
 - b. People are likely to fully appreciate the opportunity to socialise and be entertained. Greater evening activity which will benefit the city should be planned for.
5. While DublinTown sees the merit in the "15 minute city" concept, we envisage difficulties in its practical implementation given Dublin's dispersed profile.
6. A key challenge for many city businesses is staff retention. Rental costs are pricing workers out of the city. Successfully addressing the housing crisis will have enormous economic as well as social benefits.
7. Covid accelerated anticipated structural and economic changes. We are currently experiencing unprecedented vacancy which necessitates a co-ordinated and inclusive regeneration process that will re-imagine the city's commercial core. DublinTown has the data, experience at home and abroad and contacts to contribute in this regard.

All aspects of city life are manifest on our streets. Social and economic policy ultimately impacts on the city centre. Now more than ever the city's commercial core needs focused attention. We have the opportunity to create a city centre that is relevant to the needs of the public while assisting us in meeting climate sustainability and attracting investment. However, achieving this objective will require greater multi-party co-operation and engagement than we have ever experienced before.

DublinTown stands ready to work with Dublin City Council, our member businesses and other interested stakeholders to deliver a Dublin that meets the needs of residents and visitors while successfully competing on the international stage.

We respond below to the draft development plan using the chapter headings employed by the Council.

Chapter One: Introduction

This is indeed a time of change and uncertainty. Climate Change and technological advances were going to change how and where we live, but we now have the added complexity of addressing the consequences of a global pandemic and Brexit.

Across the world Business Improvement Districts (BID's) are playing a vital role in connecting both the public and private sectors while translating public policy into private actions and providing consumer feedback ensuring greater town centre vibrancy and vitality.

We will see new uses on city streets. We will see additional residential use and will see a burgeoning Evening & Night Time Economy (ENTE). There is potential for conflict between residents and night time businesses. We must look to international examples to see how this can be avoided in Dublin. We should also use our Purple Flag status to promote the city's ENTE. Purple Flag brings together DublinTown, Dublin City Council, Gardaí and local business to create a safe and vibrant night time destination. This partnership approach can be built upon to consolidate Dublin city centre's reputation as a diverse and vibrant night-time destination.

Similarly, we must be cognisant of the detrimental impacts of Protected Development Rights in the UK and avoid unplanned and unregulated residential development particularly at ground floor level.

The pandemic has also shown the role played by economic segments in supporting trade in the city. The loss of office workers was acutely felt by retail and hospitality businesses. Similarly, the closure of hospitality businesses significantly impacted on the retail trade. This reflects how people use Dublin city. More people dine than shop in the city. However, retail is by far the most dominant land use and this is likely to remain the case. Retail has a future where we adequately protect and promote it. There was evidence that on-line retail had begun to plateau just as the pandemic hit. Given the circumstances created by the pandemic it was unsurprising to see on-line sales flourish, however, it will be interesting to assess how sales from bricks and mortar stores vis a vis on-line retail will develop. Bricks and mortar retail provides an environmentally sustainable model when compared to on-line purchases. These latter purchases often travel half-way round the world by plane, wrapped in copious quantities of plastic.

As the pandemic recedes and people become increasingly confident for their own safety, we can expect them to increase their socialisation and also to seek additional entertainment options. Humans are a social creature and the pandemic has not altered our DNA. We need each other's company and we work best in teams. If we seek to eliminate this in Dublin, we will pay a high price in terms of mental health, productivity and the welcoming nature of the city.

Chapter 2: Core Strategy

DublinTown agrees with the maximum use of brownfield sites. There is no alternative to the development of a compact city which promotes sustainability and increases connectivity. We support active land management including the Vacant Site levy. We would also suggest the use of Compulsory Sales Orders in cases of wilful neglect and persistent under-utilisation of important city sites.

The consolidation of development in the city has been spoken about for some time. We must now see it activated. We cannot create sustainability and consolidate densities without active infill and brownfield site utilisation. Where permission is granted and work does not commence within an

acceptable time period, the permission should be withdrawn and the owner encouraged to activate development or transfer ownership.

Similarly, the active use of transport corridors to encourage and support appropriate sustainable development is essential. 100 years ago, London's underground system ventured out of the core city into greenfield areas and suburbs. This was seen as radical and wasteful by many at the time but development was consolidated along the transport corridors that were created. This provided a shape and structure to London's development.

It is encouraging to see that we have sufficient land for the development of 48,500 new homes, while 40,000 are required over the period of the plan. For both societal and economic reasons we need to see these homes delivered.

DublinTown is supportive of the Living City initiative and wishes to see it progress to facilitate:

- Utilisation of vacant/under-utilised spaces which may be in danger of dereliction
- Providing accommodation which supports active travel to work and education
- Providing activity in city districts at night and at off peak periods, adding to perceptions of safety and augmenting the city's customer base

The successful integration of residential communities within commercial spaces on the likes of Talbot Street and Capel Street shows how we can successfully achieve an appropriate balance.

Chapter 3: Climate Change

Climate change is the most significant challenge mankind has ever faced. The pandemic has shown that we can change how we live and work fundamentally, rapidly and in unison when required. We need to bring the same urgency to addressing a threat to the very existence of our species.

We have already seen unprecedented weather events which will only get worse. Climate change will give rise to compound events and increased flooding. We are already experiencing flooding in the Grafton Street/College Green district. In this context it is very concerning to experience sea levels in Dublin Bay increasing at twice the global average.

The target emission reductions of 40% by 2030 is tough but must be achieved. If renewed for a further term DublinTown will establish a Sustainability Committee and will work closely with Dublin City Council, national Government and members to achieve the necessary carbon reductions. A collective and co-ordinated effort will be required to reach the specified targets.

The DublinTown committee will work with all parties to develop and roll out:

- a. Training using DCC MODOS and other programmes
- b. Encouraging energy conservation including insulation and retrofitting
- c. Promoting micro-energy generation where applicable
- d. Promoting shared last mile and shared home delivery services using electric vehicles
- e. Promoting the use of flat rooves for urban farms and hydroponics to serve local restaurants
- f. Support district heating where appropriate
- g. Promoting green infrastructure including green walls and roofs to stall water egress into the city drainage system
- h. Encouraging rainwater harvesting and water conservation

- i. Promoting the use of parklets and green dwell zones to encourage increased dwell time and provide meeting spaces within the city
- j. Support tree planting to assist with carbon capture while creating a more welcoming environment.
- k. Seek sustainable and timely waste collection from business premises and segregated public waste bins on city streets.

Ultimately, we must address our settlement patterns though it is accepted that this will pose practical difficulties.

Customers have choices and they will vote with their feet if they perceive that businesses do not share their values. Research demonstrates that this is particularly true of Gen Z which is now coming to adulthood.

If Dublin city is to remain relevant to public needs, we must work collectively to create the visitor experience required both on-street and in-store. This is critical. If we do not create a sustainable, climate proofed, waste averse city we will see our vibrancy and relevance ebb away.

We believe that greening of our streets will create a more pleasant environment while also enhancing the city's sustainability. Tree planting will assist with carbon capture. Parklets and green spaces will assist in rainwater capture and assist us with the provision of better drainage. DublinTown believes that all water consumers, whether commercial or domestic should pay for their water. This would encourage rainwater harvesting and conservation.

UK research highlights the waste averse profile of many Gen Z's. Their wish to avoid unnecessary waste is likely to feature in their purchasing decisions. This is especially true in relation to plastic waste. Post pandemic we see scope for again encouraging the use of reusables, such as keep cups, as part of the customer experience.

We are now seeing the growth of quality vintage shops and tailoring services which promote the continued re-use and modification of quality clothing.

We believe that this preference can be extended to street level. DublinTown would like to see the public being offered recycling and composting options on city streets perhaps through big belly bins.

Transport

It is impossible to discuss climate change and emissions without addressing the key role played by transport. We note our views in this regard below.

Culture

Research confirms that more people are attracted to the city by cultural and artistic venues than ever before. A debate is taking place in Ireland and abroad in relation to the appropriateness of development in the context of displacing cultural uses. DublinTown supports the growing international calls to protect important uses, particularly cultural and social uses, as well as protecting physical structures. So for example, in the context of urban regeneration, venues which provide live performances would have those uses protected and a proposed development would have to accommodate such uses within their plans. Protecting such uses and the employment of the agent of change principle would help secure important attractions within the city and would also assist us in promoting Dublin's identity and appeal. This would go a long way in sustaining vibrancy for the long term.

DublinTown will support the proposed redevelopment of the Abbey Theatre. We believe that this will have an important role to play in the promotion of the Dublin One district.

Chapter 4: Shape and Structure of the City & Chapter Six Quality Housing and Sustainable Neighbourhoods

Dublin city centre suffered more footfall loss than the periphery during the pandemic. This reversed the trend whereby increasing numbers were attracted by the city's diverse offer over the last decade. We believe that the city can regain market share post pandemic where appropriate decisions are made.

In many cases responses to Covid are the opposite to what is required to address climate change. As the pandemic fades, addressing climate change will come to the fore. In this context the increased infill of brownfield sites, better use of sustainable transport and recycling will gain increasing importance. The city centre provides more sustainable options than the suburbs. It is imperative that Dublin city centre is revived and receives the support it needs from both national and local Government. The city is heavily reliant on public transport. It suffered when public transport was restricted and was the focus of negative public health commentary. This official messaging must be modified post pandemic.

DublinTown believes that there is scope for increasing both residential and cultural uses in response to the current level of vacancy in the city. In this context we can learn from the Creative Quarter Experience where young entrepreneurs acquired space on short term licenses at competitive rents. They developed strong business offerings, many of which are still active today. The district developed a strong independent identity which attracted further diverse uses which in turn assisted in attracting footfall.

DublinTown is an active member of a number of place management organisations including the Association of Town & City Management, Institute of Place Management, Global Business Districts Innovation Club and International Downtown Association. Through these organisations we have built up a detailed knowledge of interventions which have succeeded and those which have not. We also have a wealth of data on city performance and customer profiles which would be of interest to possible investors. We are keen to work with all parties to attract appropriate investment to the city and to share international best practice.

The development of residential communities within the city core will augment the customer base for city businesses. However, it is imperative that active consumer facing uses are preserved at ground level. Protected development rights, which have been opposed by the ATCM and IPM in the UK, allowed unrestricted changes of use from commercial to residential uses. This sucked vibrancy from commercial districts and jeopardised remaining retail and hospitality businesses. Similarly, the change of use from office to residential had immediate impacts on consumer facing businesses. It is critically important for the planning of Dublin city centre that we learn from such mistakes abroad and avoid similar errors at home.

Within overall housing development it is important that units are made available not only for social and affordable use but also for housing first to ensure that no section of society is left behind.

DublinTown welcomes the Council's commitment to investment in the public realm. We would also encourage public realm elements as part of commercial developments. We would like to see the

activation of proposals which have been approved under the Part VIII process, but which have not yet received funding.

We believe that the merging of public and private space can create a more welcoming environment and add to the city's appeal.

We also believe that the safety and comfort of people using public space is paramount. While Garda operations such as Operation Citizen impact positively on perceptions of public safety, we also believe that cleaning and general maintenance within the city core assists in providing civic reassurance. DublinTown will continue to work closely with Dublin City Council in this regard.

The recent vacancy summit demonstrated that the Council and city based property/business interests share broadly similar visions for the city's future. In this context collaboration should be readily achievable. Large private developments in planning and construction are sympathetic to this vision (as articulated in the Dublin One programme for example). This momentum should be built upon.

Dublin City Council and DublinTown co-operated to create the [Dublin One Project](#). This project is an evidenced based approach to the future proofing of the northern commercial core. It is encouraging to note how consistent private sector investment and proposals in the district are with the aims and ambitions of the Dublin One Project. DublinTown believes that the full implementation of the plan will be essential in securing future investment and maintaining the district's relevance in the longer term.

DublinTown supports proposals for the redevelopment of Moore Street, Liffey Street and Wolfe Tone Square. We see scope for the development of a night market on Moore Street which will support the development of the city's ENTE. The increased activity would help address perceptions of safety at night. Other cities have used such markets to promote local arts, crafts and design. We believe that there is scope to work with the Crafts Council and Visual Artists Ireland in the development of these concepts, thereby assisting local artisan producers to find avenues to market. Successful markets tend to be curated and provide the diversity of offer that attracts customers and augments the offer of adjacent businesses. International experience and indeed the experience of the Christmas Market promoted by DublinTown in 2014, demonstrates that markets attract new customers to a district, while spend outside the market is approximately 3 times that spent within the market itself.

We believe that the creation of a cultural quarter on Parnell Square will create synergies with new and expanded uses in the Dublin One District. We believe that the Dublin Central proposals will create links between Parnell Square and the core city centre to the benefit of both locations. We further believe that we can use the opportunity to develop cultural uses on Talbot Street and Marlborough Street which will connect to the proposed redeveloped Abbey Theatre. We believe that there is scope for developing artist spaces in the upper floors of Talbot Street with gallery uses at ground level. We would see potential for the further development of unique craft work and design in this context also. This would provide new and sustainable footfall in the area. It would also enable us to utilise the district for the development of cultural events. In this context, we would welcome the opening up of the Department of Education grounds for public use, open air screenings and engagement.

In addition to the creation of larger recreational areas we support the development of parklets and meeting hubs. This is consistent with research which anticipates growth in the use of the city centre as a meeting space for friends and family.

We also support the vacant site levy to encourage development in serviced areas. We are conscious of the number of premises which are derelict, semi-derelict or under-utilised. Other countries have used Compulsory Sales Orders to ensure the disposal of neglected premises. While this may require constitutional change in Ireland, we believe that it is a very efficient mechanism to bring buildings back into productive use while taking the risks associated with Compulsory Purchase away from the local authority.

DublinTown believes that a common sense rather than ideological approach should be adopted when it comes to building height. We are not in favour of excessive height in the core city centre where landmark buildings of significance would be overshadowed, and the natural rhythm of the district negatively impacted. We are also conscious of Jane Jacobs' observations in relation to height and the development of local communities in her seminal work *The Death and Life of Great American Cities*. However, we see a role for higher buildings in areas of office accommodation with good access to public transport.

DublinTown supports further development of the Docklands. We see scope for increased residential use within the district. We would also advocate for greater connectivity through Luas and active travel to the city's core commercial district. We see this connection assisting in attracting further inward investment. We see scope for the development of passenger traffic in the port. We believe that the Luas should be extended to meet a purpose-built passenger terminal. As the Luas Red Line connects with Connolly and Heuston train stations as well as Busáras, such a passenger terminal would be well connected to the country's public transport network. Brexit has opened opportunities for Rosslare and Waterford ports. The argument for maintaining Dublin as such a dominant industrial port is weakening. It is now time to future proof the port in line with a city vision and national industrial priorities.

We would caution against an over reliance on the "15 minute city" concept, particularly as it pertains to the provision of appropriate employment for all within a 15 minute radius of their homes. Cities are complex. Research in Ireland and internationally highlights the diverse consumer use of cities. This diversity is more sustainable and commercially viable within city centres. Suburban centres are unlikely to have the critical population mass to sustain a similar range of businesses. Resources should be deployed to locations where success is most likely rather than having a dispersed approach which fails to fully meet the needs of the community. In many ways the 15 minute city reflects the aspirations of the Garden City concept of the 19th century. While having merits, the model ultimately failed to meet community expectations and added to urban sprawl in the 20th century. We are unconvinced that this is the most suitable model for Dublin nor that co-working hubs are viable in many of our suburban villages.

Ireland's economic future is most likely to be service based. We agree that the repurposing of industrial complexes for modern uses including residential uses in sites generally well serviced by public transport makes sense. We further agree that residential districts should provide an array of homes which allow people to stay within a specific location throughout each of their life stages.

Chapter 6: City Economy and Enterprise

The draft Development Plan rightly identifies the two major factors which will determine economic and social development in the coming years, namely the technological revolution and climate change.

While accepting that Data Centres consume large amounts of energy, it must also be accepted that data and its processing is likely to be a significant economic factor in the 21st century economy. Therefore, it would be unwise to jettison a policy of facilitating data centres without thorough consideration of their energy needs in the context of total energy generation, together with a related assessment as to how these energy needs can be met.

The 2020's will determine the course of the 21st century. We cannot take Dublin's appeal as a place to invest for granted. We must invest in the city and remain relevant to 21st century needs. Work from Home means that employees can work from anywhere in the world no matter where their employer is based. This could impact on investment decisions and related taxation of incomes and profits. To tackle these threats we must enhance the quality of life offered by Dublin City. This needs an all of city effort. We must also enhance our messaging and develop a brand identity with which to market the city internationally.

We can utilise our status as the only large English speaking city in the EU. In addition, as the European headquarters for many of the world's leading technology companies, we can and must take an increased role in the development of Artificial Intelligence and next generation technology applications.

We don't believe that office hubs and co-working spaces can replace centralised offices. The key strength of the office environment is the ability to bring people together to work as a team. A core human characteristic is the ability to form teams comprising people of differing talents. Office environments also act as training centres where new employees and graduates can learn from more experienced colleagues through formal and informal systems. Work hubs and co-working is no substitute for this on the job learning process.

Hotel development pre-pandemic was helping to bring supply and demand for tourist accommodation back into balance. Dublin was not over-touristed in 2019 and therefore, there is scope for welcoming increased tourist numbers without placing excessive pressure on our tourism and related infrastructure.

We anticipate that by 2024 we will see tourist numbers return to their 2019 levels. We welcome the fact that much of this hotel development is on the city's north side. Pre-pandemic, tourists were 5 times more likely to stay south of the river. The rebalancing of tourist flows will assist us in developing the north side's hospitality offer which Dubliners would like to see, as well as supplying customers for the attractions being developed north of the river.

While there is still a role for the use of private accommodation in meeting an element of tourist need, we believe that this sector requires regulation and an equalisation of tax treatment between suppliers in the market.

Another key attraction to the city is authenticity. Dubliners and visitors seek authentic and unique experiences. DublinTown will continue to promote such unique attributes through its [Uniquely Dublin](#) promotion whereby independent offerings which can only be found in Dublin are promoted.

Chapter 7 City Centre, Urban Villages & Retail

Humans are a social creature and that is not going to change. We will still use our towns and cities as places to meet and socialise. The proposed investment in the public domain and the creation of safe, welcoming places to meet is of increased importance in this context. We would also advocate

the use of [CPTED](#) (Crime Prevention Through Environmental Design) techniques to enhance perceptions of safety, particularly at night.

DublinTown believes that there is considerable value to maintaining the Special Planning Controls in the Grafton and O'Connell Street districts and also the Architectural Conservation Areas.

A key challenge in the coming years will be to create the appropriate business mix within each of the city's commercial districts. DublinTown would not support the clustering of businesses of specific types. We believe that Category 1 and 2 designation for retail streets is now obsolete. We do not support the clustering of food and beverage businesses but do support multi-use streets where there is a good balance of different types. Such multi-use streets are consistent with how people use cities. They do not go to one location for retail and another to dine. They want all experiences in the one location. People will gladly walk 250m from their point of alighting and up to 500m where the offer is sufficiently strong. They are reluctant to walk further than this and this key aspect of city use must be kept in mind.

DublinTown supports shared last mile delivery to stores, potentially utilising car parks as delivery hubs. In time there may be options to link sustainable last mile delivery with rail freight options.

We further support shared deliveries from the city to customers' homes. We can utilise the DublinTown *Shop N Drop* experience to develop this concept to facilitate customers using sustainable transport to access the city where they can avail of the full city offer. There is a commercial model that can be developed in this regard.

It will come as no surprise that DublinTown agrees that out of town retail developments, which are car dependent should not be supported. The city's strength is derived from the diversity of its offer and the interconnectedness between the various sectors. DublinTown will utilise this key strength in its messaging to the public and will work with all relevant stakeholders including Dublin City Council to amplify it.

Adult stores are known to dissuade families from visiting a street. In recent years we have seen increased use of secondary streets particularly as hospitality businesses have chosen to locate there and have benefited from a more favourable outdoor dining regime. A number of these streets have the legacy issue of adult stores operating on them. We do not believe that adult stores are an appropriate use in districts which seek increased footfall and appeal to a family market. In this regard we would note the efforts made in New York to reduce the concentration of such stores and the positive impact this had in increasing footfall and also attracting other more beneficial uses.

DublinTown fully supports the city's laneway strategy. This strategy emanated from the Dublin One project and we see tremendous scope for the re-purposing and re-use of laneways in the city to create residential opportunities, additional complementary commercial uses and to create greater permeability and connections within the city core. We can learn from the experience of other European cities to maximise the potential of these laneways. We believe that lanes that are allowed become cul-de-sacs pose the greatest challenges for the city and should be unblocked where possible. The permeability thus offered would enhance the attractiveness of the city immensely and would turn what are currently barriers to city use into attractive features.

DublinTown supports the creation of pedestrian zones within the city core. The creation of such pedestrian zones facilitates the combination of retail and hospitality businesses together with hair, beauty and entertainment. The experience of trial pedestrianisations in June 2020, when we saw families move freely through the city, should be built upon and made permanent. This would allow

us the space to create a far more welcoming environment for all visitors. We believe that car parks should be used to house taxi ranks, particularly at night. This would facilitate the engagement of taxi marshals, assist security and safe queueing. Other cities have used such safe taxi facilities to enable taxi sharing at peak periods to reduce waiting times and to get people home safely.

DublinTown believes that we should have 24 hour manned public toilets with a cost of c.€1 to use. Such facilities are successfully provided on the continent. We would advocate for the provision of public toilets together with the use of a concierge service with public facilities. DublinTown would be interested in supplying visitor assistance staff for such a facility.

The city has a significant level of clutter on its streets. We propose a full audit of signs and street furniture to help us create an enhanced ambience in the city.

We would further advocate the use of technology rather than excessive on street signage to further the city's way finding scheme.

Chapter 8: Sustainable movement and transport

Before the pandemic almost 80% of customers used sustainable modes of transport to access the city. Two-thirds used public transport. This contrasted with almost 80% of out-of-town shopping centre customers who used their private car to access their destination.

During the pandemic more people felt safe using their cars as official messaging clearly identified public transport as inherently dangerous, placing passengers at risk of contracting Covid. This messaging benefited out of town shopping destinations.

As the pandemic recedes and the need to address climate change comes to the fore, we can expect the tenor of the debate to change once again. A sustained messaging programme is essential to encourage public transport use. Public messaging needs to identify that we all have a role to play in addressing climate change and a key way to respond is through energy and travel choices.

In changing habits the Government must lead by example. At present it does not. A large number of public servants based in Dublin city centre are provided with free employee parking. Public servants are significantly more likely to have access to free parking than private sector workers. A similar situation was noted in Nottingham. The Local Authority realised that they had the largest car park in the city and that their employees were availing of free parking while the Council was advocating the use of public transport. In response they introduced a levy on free employee car parking. The levy is payable by employers but can be recharged to the employee. The levy applies to both public and private sector employers. The funds received are ring-fenced for improvements to public transport infrastructure, for example real time information and bus shelters have been upgraded through the fund as has the city's cycle infrastructure.

While car use amongst commuters has decreased in Dublin, the Cordon Count demonstrates that a higher proportion of commuters than customers use their car to access the city. This must be systematically addressed if we are serious about reducing car usage in the city.

Similarly, both private and public sector workers are incentivised to use their cars for work purposes by overly generous mileage allowances. While this is presented as meeting the costs of using one's private car for work purposes, it is generally accepted by all that the allowance represents a significant reward for the recipient. It is not uncommon to see a number of colleagues all drive to an event separately and to claim these overly generous mileage allowances. There is no incentive to

use public transport. Again, this must be addressed systematically. Mileage rates should be reduced and employees incentivised to use public transport.

DublinTown supports the NTA's plan 2022-2042, however, we believe that the timescale for delivery of projects is simply far too long. Proposing projects to be completed after 2042 is a meaningless gesture. Very few of the projects detailed in the plans will carry passengers before 2030. They will therefore play no role in attempts to achieve emission targets by that date. The timescale for delivery of these projects must be consolidated into a significantly shorter time period to have credibility.

We support transport hubs and the better integration of transport options. Allied to this we see scope for using technology to alert the public to available sustainable transport options and to assist them in making the right choices. This technology can be integrated into the broader way finding systems.

DublinTown supports bicycle sharing schemes. We also support the introduction of e-scooters and related sharing schemes. We believe that bicycles and e-scooters should be allowed on public transport to obviate the need for long walks at either end of the journey. There is an argument for more bicycle/scooter sharing and parking at DART and Luas stops.

While there has been much discussion around the need to upgrade cycle infrastructure, cycle lanes still have poor quality surfaces, are not continuous, and merge with general traffic at busy junctions. Cycle lanes are not sufficiently segregated. Research points to the fact that people, and especially women, choose not to cycle as they do not feel safe. Parents express concern with the cycle routes available for their children. These concerns are real and must be addressed systematically without delay. The development of cycle infrastructure includes increased safe and preferably off-road bicycle parking.

An inviting pedestrian environment is important in attracting customers to the city. DublinTown believes that kerb side space should not be used for parking but rather devoted to more welcoming uses, including outdoor seating, parklets and for wider footpaths.

We believe that there is a need to maintain car access to the city centre but not necessarily to every street. We believe that car parking at the edge of the commercial district is important but that the positioning of a car park should not be to the detriment of more beneficial uses within the commercial district. Pedestrians should be prioritised.

There has been increased emphasis on the use of electric vehicles as part of an overall climate change and emission response. Electric vehicles require energy to function. The generation of this required electricity is highly likely to result in emissions. This needs to be considered. The migration from fossil fuel to electric vehicles will not address traffic congestion. The mining of lithium for battery manufacture is not always an environmentally friendly process. Therefore, we believe that the emphasis should be on support for active and public transport rather than on electric vehicles.

We believe that valuable kerb side space should be devoted to more productive uses than the housing of recharging points or on-street parking. We note the plan's commitment to maintaining public multi-story car parks. We believe that electrical power supply could be provided within these facilities.

We must face the reality that we have a widely dispersed city. People are forced to live in neighbouring counties and commute to the city due to the unavailability of accommodation and high rents. It makes sense in this context to have park and ride facilities along the major corridors into

the city. These facilities should be provided along the M1,2,3,4,7,11 corridors adjacent to Luas and rail routes into the city. The cost of parking in these facilities should not be prohibitive and should be made attractive to commuters.

The draft Development Plan correctly identifies the centrality of transport in facilitating other developments both residential and commercial. The creation of transport corridors can serve to concentrate development in appropriate locations. All too often transport, and other vital infrastructure plays catch up to developer led housing. Retrofitting vital utilities into neighbourhoods is met with resistance and objections by small but vocal minorities. It is imperative that proper public transport planning is integrated into the broader decision-making process.

Chapter 9: Sustainable Environment & Flood Risk

There are clear issues of concern with climate change, emissions and waste. Addressing these concerns will require co-operation from both the public and private sectors. BIDs across the world are acting as a conduit between Government and businesses to address environmental concerns. DublinTown sees a clear role for itself in this regard.

DublinTown supports green infrastructure including green walls and roofs.

We will continue to engage proactively with both property owners and trading businesses on environmental issues. On securing a fourth BID term we will establish a Sustainability Committee. It is expected that this committee will support the circular economy, green infrastructure and micro-electricity generation.

Waste management is a significant issue for many businesses. The process is costly and the presentation of waste in the evening is unsightly. Waste collection may not occur until close to midnight and can take place after this time. This is a significant issue for businesses who trade in the ENTE. General city cleanliness has reduced since the Council outsourced waste collection. There have been calls to reinstate Council collections for domestic customers. DublinTown advocates a similar approach for commercial collections within Dublin city centre.

There is a clear imperative to encourage conservation and recycling. There is also a need to promote re-use. While re-use was shunned during the pandemic, in the era of sustainability this is a trend that we are likely to see resurfacing.

Water conservation and rain-water harvesting should be supported for both domestic and commercial customers. In an era when we are likely to have periods of drought and excessive rainfall events, managing our water resources makes increased sense.

DublinTown will actively support the Council's MODOS programme and other similar training programmes to inform members of conservation opportunities and to encourage best environmental practices.

DublinTown has supported trials aimed at segregating waste in public bins. We will continue to support this and other similar initiatives that segregate waste into compostable, recyclable materials and general waste. The public are used to segregating their waste at home and this should be added to the on-street environment.

Reducing vehicle numbers and encouraging shared deliveries would assist us in improving air quality within the city centre as would increased pedestrianisation within the core city centre. As the

decade progresses we will see more buses convert to electric motors which will also improve air quality in the city. DublinTown believes that electric commercial vehicles should be allowed use bus lanes off peak to encourage the migration to emission free vehicles.

Chapter 10: Green Infrastructure and Recreation

DublinTown supports re-wilding, tree and flower planting together with the maintenance of bees on flat roofed buildings. We will promote urban farms and the use of hydroponics to serve city centre restaurants.

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