



Dublin City Development Plan 2016-22 Issues Paper

DublinTown Submission

DublinTown (formerly Dublin City BID) is the Business Improvement District for Dublin City Centre. The organisation was provided with a mandate to represent the city centre's 2,500 businesses following a plebiscite of businesses in 2007. This mandate was renewed in 2012 following a second BID ballot in 2012.

We welcome the opportunity to make this submission as part of the Dublin City Development plan issues paper consultation.

Introduction

We believe that the City Development Plan 2011-2017 is a strong well thought out plan that if fully implemented has the potential to significantly improve the quality of life for Dublin's citizens. DublinTown made a detailed submission in relation to the plan and remains supportive of the vision contained within it. While we understand that circumstances can change over the life time of a plan we believe that there is merit in considering unfulfilled aspects of the 2011-2017 plan to identify those elements that could and should be still implemented.

In Ireland we have a heightened fear of failure. This can lead to good ideas not being progressed. We are all aware of circumstances where small, unrepresentative but vocal groups can have a disproportionate influence on ultimate decisions. We would like to see new and innovative ideas trialled for a period of time. If they work, we all benefit and if they don't, we can modify a plan or abandon it. However, we shouldn't be afraid to try ideas and to accept that the failure of some ideas is inevitable. We need to see what impact an idea can have before we dismiss it outright. We would point to Dublin City Council's Beta projects scheme where such an approach has demonstrated success.

Allied to this we would advocate research with the city's population to gain a greater understanding of the public view on proposals and ideas. This is particularly true in the case of proposals which have the potential to be controversial.

Shaping the City

There is increasing international evidence to suggest that how people use and engage with cities is changing. The rapid and continuing growth of technology is changing how younger people are engaging with their surroundings. One significant manifestation of this is in the area of on-line retail. Retail consultants in the UK are predicting that 35% of retail sales will be conducted on line by 2020 with a resultant over supply of retail space in our nearest neighbour. Dublin City Centre, with correct management is ideally placed to rise to the challenge presented. Younger people crave an experience when they visit a destination. This will include a mix of retail, leisure, entertainment and hospitality experiences which they will want in one location. The line between the shopping trip and the social/leisure trip are blurring. Retail customers increasingly prefer to be in a space that offers them quality options to eat, socialise, and to be entertained.

This symbiotic relationship works well in those districts that have a strong retail offering complemented by excellent dining, entertainment and hospitality. A good example is the category 1 retail street of Grafton Street which strongly benefits from the top quality dining and hospitality offering in streets like Duke Street, South Anne Street and in the adjacent Creative Quarter.

However, some once thriving retail districts face challenges that require sensitive solutions. An example of this is the Talbot Street area. Talbot Street is designated as a category two retail street and is also home to, or adjacent to many large offices, cultural attractions like the Abbey Theatre and key transport infrastructure such as Busáras, Connolly Station and the red LUAS line. Quality restaurants such as Le Bon Crubeen and 101 Talbot have shown that there is a demand for a strong dining in the area yet, for example a recent change of use application for a new restaurant at the former Guiney's building at 79-80 Talbot Street was rejected on the basis that Talbot Street was a category two retail street (planning reference 3179/14). This is disappointing. We believe that the changing patterns of use described above will require a rethink of traditional models and designations. Talbot Street and its environs has struggled in recent years. We need to consider how existing and potential future uses that will appeal to the 21st century consumer can be accommodated within this and other districts in the city centre.

As a city we have designed out some facilities such as public seating and public toilets which are required to make a city more welcoming and comfortable. These decisions are based on a fear that such facilities will be mis-used. As a city we are struggling with certain demographics for example people with young children and senior citizens. This is something that we need to correct. Other cities manage potential difficulties with public facilities and we need to find a way to manage them in our city. We all have a role in addressing and combating anti-social behaviour but equally we have to make our city a destination that both our local population and tourists want to visit. In the case of public toilets we believe that an unfair responsibility is being placed on the city's businesses to provide this service. We believe that staffed and well monitored public toilets provide an important public service and would also be of considerable benefit to families with young children. We also need adequate provision of public seating. We can develop bye laws to regulate their use.

Improvements in the city centre and the establishment of better quality of life will prove to be important additions in attracting FDI. Increasingly, the quality of the environment and quality of employees that such an environment will attract is a key consideration for major corporations in choosing where to locate.

City and Regional Economy

The plan rightly notes the need for more restaurants and cafés and their critical role in making the city more attractive for workers, visitors and residents. However, a major barrier to the development of an evening economy in Dublin is the cost of outdoor seating for establishments. The current cost is prohibitive and any licence that is applied for must be sought for a full 12 month period. We propose a decrease in the prices for annual licences and the option of 3 or 6 month licences to reflect the seasonal changes in weather and customer numbers.

Other cities charge for outdoor seating in various ways. Most simply require a flat annual fee to be paid. This fee is decreased by most local authorities after the first year. Below are a few examples of comparable cities in the UK.

Edinburgh: The cost of a permit varies depending on whether the location is within a world heritage site. If inside such an area, the cost is £85 per m² or £65 if outside world heritage boundaries.

Glasgow: The standard annual fee is £175. Planning permission is not necessary for every application but it is advised that the planning authority is contacted prior to application.

City of Westminster: The fee depends on the number of chairs a café intends to have. Licences operate to 7pm and there is an additional charge for each hour past that time also. There is also a supplement added to new applications which is not payable for licence renewals. The maximum fee is £2,700 for a seating area of approximately 40 seats. An equivalent space in Dublin would cost more than €10,000.

Nottingham: The cost for a new licence is £300 and the cost for licence renewal after one year is £150.

In order to develop the potential of an evening economy on the north side of the city, we plan to develop a Purple Flag Strategy for the North side of the city in 2015 with an eye to gaining Purple Flag recognition in 2016. Purple Flag status is awarded to town centres that meet or surpass the standards of excellence in managing the evening and night-time economy. It is a very positive initiative that indicates an entertaining, diverse, safe and enjoyable night out. Through a partnership with many stakeholders, including Dublin City Council the Creative Quarter and Dame District areas were awarded a Purple Flag in 2013.

Movement and Transport

Transport is a major issue for the city's development. It is imperative that a high quality integrated, frequent and reliable public transport service is provided. LUAS Cross City will be a welcome addition when it is completed and it will provide an important link between the north and south sides of the city centre.

After detailed consideration we came to the conclusion that the BRT proposal is unlikely to meet the objectives set out for it. We set out our reasons for reaching this conclusion in the attached [submission](#).

We are of the view that we should consider proposals that meet our longer term objectives and which have the potential to use existing infrastructure or which develop infrastructure that can be adapted to meet our city's longer term needs. We believe that there is scope for considering alternative proposals such as the extension of LUAS infrastructure, using the port tunnel and a DART extension to connect Swords and the airport to the city. The Metro North and DART Underground projects have considerable worth. They have been postponed indefinitely due to costs

considerations. However, we require these services for our city to fully function. The financial success of the LUAS has surprised many sceptics. While these are ultimately NTA & Government decisions, those of us with a stake in the operation of the city need to articulate the requirement for a fully functioning and integrated transport infrastructure. We must push for the better use of integrated ticketing through the leap card to improve the efficiency of public transport.

We would therefore believe that Dublin City Council, together with the business community and other stakeholders should come together to consider how these vital additions to our transport system can be brought back into debate and assess how funding through PPP mechanisms may offer a solution to the present funding gaps.

It must be borne in mind that for a significant cohort of shoppers, car transport is still the primary mode of transport. Technology can play an increasingly important role in ensuring that car drivers find their destination car park easily. The development of an app that will guide customers to their car park or parking space of choice should be prioritised. In this context we need to consider that a shopper from the north side of the city may wish to shop and park on the south side of the city while shoppers from the south side of the city may choose to shop and park on the north side of the city. The car park chosen will be determined by their destination and not the first car park they encounter as they enter the city.

We welcome the integration of the cycle network in the city which will necessitate a cycle-way linking the Phoenix Park to the cycle-way along the bay. This should be done through the extension of the boardwalk along the north side of the Liffey. The current road network is already clogged and taking out a lane of traffic to provide additional cycle space is likely to have negative economic and traffic consequences.

The Henry Street District is underperforming. To help address this, we would advocate the redesign of the junction between Mary Street and Jervis Street in order to integrate the lower end of Mary Street and Capel Street into the Henry Street district (See figure 1 & 2 below). Capel Street is re-imagining itself with a better quality food offering and an array of strong retail offerings such as Louis Copeland and John Brereton's jewellers.

Figure 1:

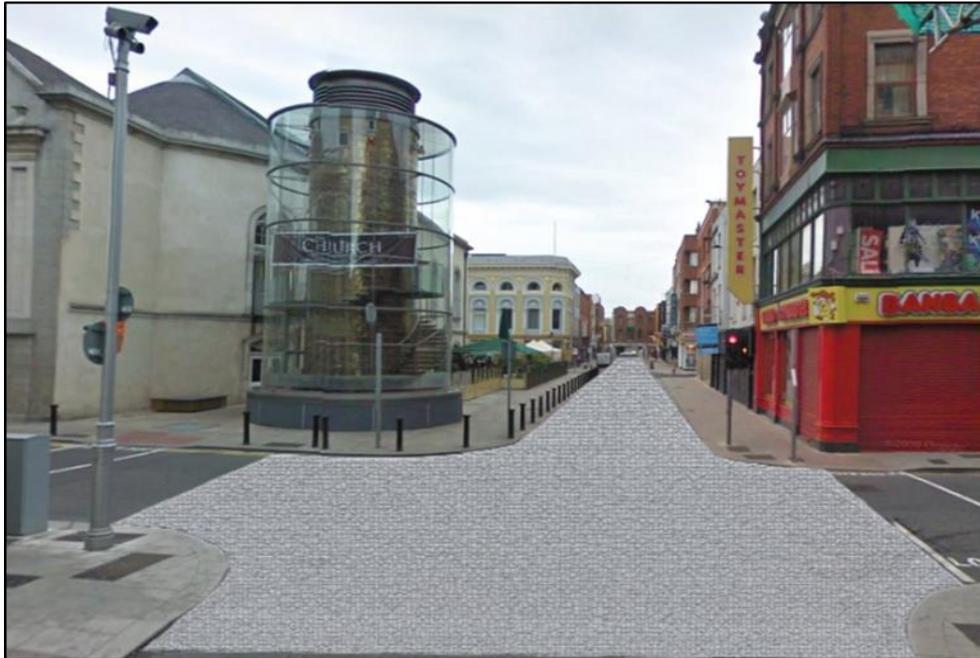


Figure 2:



Research on pedestrian movement has shown that people will walk 250m to 500m but are loath to walk beyond those limits. This would suggest that the aspiration to connect Grafton Street to Henry Street is unlikely to be fulfilled through pedestrian routes alone. We should concentrate on creating strong district identities and brands. We should facilitate the strengthening of the offer within the city's districts in ways that are consistent with those brands. The completion of the LUAS Cross City will strengthen the city's transport links between both sides of the river and we would support the creation of a LUAS city centre fare similar to that offered by Dublin Bus within the confines of the city centre. This could be promoted through additional use of the leap card.

Population and Housing

Internationally there is a migration back to city centre living and away from suburbs. We should encourage this move towards the city on the basis that it allows for a better quality of life while

facilitating lower carbon emissions and reducing car dependence. This movement will require the development of higher density quality housing in the core city and immediate suburbs. Strategic Development Zones in Grangegorman and in the North Lotts and Grand Canal Dock areas of Dublin will allow for accelerated development.

There are designs utilised internationally which allow for quality family life in apartment blocks with appropriate children's play areas. Apartments in Ireland tend to be focused on adult accommodation without sufficient consideration for family needs. This has to be addressed. Regeneration initiatives such as Living over the Shop Scheme and the Integrated Area Plans led to the redevelopment of north side streets such as Capel Street and Parnell Street. A residential population can have a very positive impact on an area and generates a demand for an integrated economy.

We agree that the student accommodation provisions of the development plan need to be updated to encourage the provision of additional high quality, professionally managed accommodation in Dublin City. Provision of additional student accommodation would serve to attract international students and English language students while regenerating areas in the city centre.

Unfortunately, as we are all aware, too many of our citizens are experiencing homelessness. Not only is homelessness a personal tragedy for those experiencing it but it is impacting on wider society. The resources required to implement the Dublin Housing First Project must be prioritised.

Sustainable Environment and Infrastructure

While we welcome the progress that has been made in waste management and waste prevention in the city, greater regulation is required. The regulation and enforcement of waste collection are the responsibility of the Council and effective regulation is essential for a clean, welcoming city centre.

In relation to environmental noise, we are largely in favour of the Draft Control of Street Performers Bye-Laws. DublinTown made a detailed submission which noted that a small minority of street performers were the cause of regular difficulties. The majority of complaints received by DublinTown related to excessive noise caused by amplification, loud percussive instruments such as drum-kits and the obstruction of public access to a street or premises. It is very difficult for businesses to trade, particularly those in offices of which there is a high concentration around Henry Street and Grafton Street. The noise caused by these performers makes it impossible for their business to be carried out smoothly and many businesses have said that the noise and lack of regulation is the "number one concern" they have for their business. The effectiveness of the Control of Street Performers Bye-Laws will be dependent on their effective enforcement.

There is a general point that is often raised by businesses. As a city we do not have sufficient enforcement of bye laws which have been developed to improve the city experience for the majority of our citizens. We believe the city would benefit from structured and systematic enforcement of bye laws in general. This would include litter pollution, illegal casual trading, non-compliance with waste management regulations as well as other city bye laws. A small minority of people are having a disproportionate impact on the ability of citizens and visitors to fully enjoy our city and this is not acceptable.

Green Infrastructure, Landscape, Open Space & Recreation

We welcome the commitment of the Dublin City Council to raising the profile and awareness of Green Infrastructure over 'grey' solutions. In this context, we welcome the innovative approach of

Dublin City Beta Projects, many of which greatly improve the city's visual appeal. Flexible use of space such as Park(ing) Day, Love the Lanes and Granby Park challenge perceptions of the city and encourage people to spend more time in the city centre.

Retailing

Dublin's city centre retail core remains the primary retail destination in the country but the retail sector has had to adapt to meet consumer's needs. The continued rise of online retailing and mobile commerce presents a challenge to the traditional shop. There is evidence internationally of retailers such as Walmart downsizing to smaller floor plates and moving operations from retail parks to city centres. Retailers will devise their own strategies to deal with on-line competition but as a city we need to ensure that we provide a welcoming and safe environment. We need to appeal to the 235,000 workers in Dublin 1 and 2 and persuade them to stay in the city after office hours. This may require changes to traditional retail hours as well as additional lighting and improvements in the perception of safety in the city. Services like Shop and Drop and also delivery services from the city to customers' homes and offices should also be trialled for a longer period of time. If we can achieve these changes city wide the cost to retailers/customers will be reduced.

The north side of the city needs special attention. The important retail spine of Henry Street is suffering from the fact that Moore Street, Liffey Street & Parnell Street are poorly presented and are of inadequate public domain. There needs to be an investment in the paving and lighting on these streets. The traditional market on Moore Street is struggling. Supermarkets based on the street are able to sell produce at costs below that available for the traditional stall holders. The market needs to be re-imagined with better quality and better presented stalls with encouragement for stall holders to sell a more diverse product.

The customer of the 21st century is likely to be experience driven so the experience both inside and outside businesses needs to be positive and consistent. There has already been a move towards greater integration of retail and leisure options. As Dublin seeks to attract and retain a skilled and educated workforce, we are likely to require quality arts and entertainment options which are strategically placed within close proximity to restaurants and retail options. In this context the proposed development on Parnell Square is particularly welcome. The city lacks quality event spaces. We should put our collective imaginations to address this. We should open up public spaces like the custom house and Tyrone House to the public and consider holding events such as open air concerts, screenings and theatrical performances which will open these areas to a broader cohort of the city's population. We also need to place a particular emphasis on what makes Dublin city unique and special which will involve the promotion of unique businesses and products. This will assist us in attracting both Dubliners and tourists to our city.

In this context it is worth noting that 95% of Dublin's footfall is accounted for by Irish people. While tourism is very welcome and important, we need to understand that the city's vibrancy and authenticity which adds to its appeal to tourists comes from the indigenous population.

Vacancy in the city is falling towards 9%. At this time, we are better served concentrating on promoting longer term businesses that are consistent with district identities than encouraging lower quality pop up businesses.

Community Infrastructure and Social Inclusion

Perceptions of the city as a safe and welcome environment are essential. Survey after survey shows that people simply do not feel safe in Dublin City Centre. This is an indictment on everyone with

responsibility within the city. While a Dublin Town survey across Dublin city and county found that the majority of people believe that the city centre experience has improved in the past five years, we still have issues to address that are negatively impacting on that city centre experience. Dublin City Council has agreed to the gating of some lanes in the city and this has assisted in addressing localised issues of anti-social behaviour in those locations. We would envisage re-opening these lanes with new and imaginative uses when anti-social behaviour has subsided. We would also see scope for removing under-utilised phone boxes with comreg agreement as these spaces are being used for various forms of anti-social behaviour.

More generally negative comments about the city pertain to: anti-social behaviour, aggressive charity collections on the street, loud busking and street performance, illegal casual trading. These issues need to be regulated and addressed constructively.

Culture and Heritage

We welcome the City Council's ongoing commitment to protecting the city's historic features and the conservation of historic areas and structures. The recent restoration of the City Assembly House on South William Street enabled the Irish Georgian Society to move in to a structure which had lain empty since the closure of the Dublin Civic Museum in 2003.

It is imperative that the business community is involved in the planning and implementation of the Centenary Commemorations for 1916.

Tourism

DublinTown's four information kiosks are manned by our ambassadors who assist 250,000 tourists and Dubliners annually. The team provide information on Dublin, including maps, bus timetables, directions and recommendations for accommodation, shopping, restaurants and activities in the city centre. We believe that there should be more electronic information points in the city centre advising people of nearby attractions and opportunities. These would complement the existing information kiosks and tourist information points.

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