



Commentary on the revised Dublin Development Plan

Dublin Town is pleased to reply to the revised Dublin Development Plan. Dublin Town broadly welcomes the plan and believes that it has the potential to significantly improve the city for citizens, residents, visitors and the business community. Dublin Town would like to see the plan implemented consistently in the coming years. The commentary below should be read in conjunction with submissions previously made by the organisation in relation to the Dublin Development Plan.

1. Vacant land levy

Dublin Town supports the vacant land levy proposals.

2. Ref 8.4 Transport

Dublin Town is very supportive of the vision contained in the NTA Strategy 2015-2035. However, we are concerned at the timescale for delivery. Dublin has a growing population and post Brexit we must make the city a more attractive location for inward investment and we must be capable of proving that we can accommodate that investment. One of the significant areas of infrastructural deficit is our inadequate public transport provision. International trends and Dublin Town's own research point to the fact that people, and in particular young people, will opt to use public transport where they can rely on an efficient frequent service. Dublin Town believes that we must have immediate investment in the two transport pillars of DART Underground and Metro North. We also wish to see plans for the electrification of the current rail suburban rail system together with the proposals for additional Luas lines to Lucan and Finglas progressed without delay. In the case of the Finglas line (which will be a continuation of Luas Cross City which is being currently constructed) we would advocate that it links with the Metro North line in Ballymun providing people on this line with access to the airport, DCU and other Metro North stations with one interchange.

Dublin Town and its members are not convinced by the proposals for the development of a Bus Rapid Transit (BRT) service. A BRT would carry 120 passengers compared with 88 on a traditional bus. We don't see how the road space required for a BRT service on the approaches to and within the core city centre could be provided without undue discommoding of existing transport modes. We believe that BRT would prove to be an inadequate substitute for a well-planned and integrated transport solution. We also believe that BRT's requirement to take land currently used for other purposes including current and proposed residential uses will lead to long and costly legal disputes and engagement with planning regulatory authorities. We are not convinced that the cost in time and money of such actions will be justified by the end product.

3. Ref 4.7 Cruise Ship Terminal

Dublin Town is supportive of the overall plans to upgrade Dublin Port. In particular we welcome the proposed investment in Cruise Ship facilities in the port. At present passengers are given a poor first

impression of the city as they land in a less than attractive industrial port. We believe that the development of a welcoming terminal and facility would considerably enhance this first experience. We would also believe that the LUAS should extend to this facility so that cruise ship passengers would be provided with a cost effective option for gaining access to the city and other transport hubs. At present, passengers are offered an excessively expensive bus journey to the city again creating a poor first impression.

4. Ref 5.10 City Living Initiative

In line with other cities, we anticipate that more people will want to live within Dublin city centre. However, as well documented there is a lack of suitable accommodation in the immediate city core. We therefore welcome the city living initiative. It is our view that schemes such as Living Over the Shop have not succeeded due to excessive restrictions in trying to retrofit buildings built 250-300 years ago to meet the standards of new builds. We welcome the flexibility proposed in the Development Plan.

In wider terms Dublin City is experiencing a shortage of both residential and office accommodation. This is of critical importance in a post Brexit situation. There are likely to be many negative impacts of Brexit on Dublin. A recession in the UK could well have implications for the Dublin economy. In addition prolonged weakness in Sterling could also have significant adverse implications for us here. One of the possible positive implications for Dublin would be the relocation of business currently based in the UK to Ireland in order to gain greater access to the Single Market. However, the infrastructural deficits including transport, residential and commercial accommodation is making Dublin a less attractive location for such investment. It also has to be noted that the international trend is for greater concentration back towards city centres. We don't believe that the provision of accommodation in counties neighbouring Dublin will sufficiently enhance the city's appeal as a destination for investment. We therefore believe that Dublin city centre and its immediate surrounds will have to see significant increases in both residential and office densities. We would therefore, advocate higher rise buildings in these locations.

We would also welcome measures to encourage the return of the city's Georgian Squares and surrounding streets to residential use. Finally, we are strongly of the view that as the city's population increases we will see more apartment dwelling. We believe that families will wish to stay in apartments where these meet their needs. Therefore, we support the construction of more 2 and 3 bed apartments and would also see the need for apartments to have amenities and facilities including safe indoor and outdoor play areas for children.

5. Ref 6.8 Markets Area & The Northern Retail Core

Dublin Town welcomes the proposals to provide a greater connection between the proposed development of the markets area and the existing northern retail core which is centred on Henry/Mary Street and includes Capel Street. We see scope for developing a symbiotic relationship between both locations which has the potential to assist in securing greater growth for both while providing visitors with more choice and diversity. Dublin Town would welcome the opportunity of working with Dublin City Council to realise this potential.

6. Ref 8.5 Public Realm Improvements

Dublin Town welcomes the proposed investment for an improvement in the Public Realm from Batchelor's Walk to Stephen's Green. However, we would also see considerable scope for similar public realm improvements between Parnell Street and the Quays. Research conducted by Dublin Town demonstrates categorically that the public are not enthused by the public domain in these locations and are not using the streets surrounding Henry Street in the numbers that would expect. This has a significant negative impact on the entire area including Henry Street and is an issue that we would like to address.

7. Ref 8.11 Reinstatement of Entrance to Connolly Station at Amiens St/Buckingham Street

DublinTown welcomes the proposal to reinstate the entrance to Connolly Station at Amiens St/Buckingham St. which we believe will assist in generating footfall in the Amiens St & Talbot Street areas.

8. 8.24 Addressing car borne commuter traffic

19% of shoppers coming to Dublin city use their cars. This compares with 33% of those crossing the canal cordon at peak times. Therefore, there is a higher proportion of people using their cars at peak times. Retailers are concerned that efforts aimed at controlling car usage and encouraging public/sustainable modes of transport will excessively concentrate on the discretionary visitor. The concern is that those people who wish to use their car on a shopping trip will continue to use their car but will head to a retail park rather than the city centre. This concern is compounded by the fear that by inadequately addressing car use by commuters during peak periods that traffic congestion will not be successfully tackled in the city leading to further measures. Other cities have successfully addressed similar issues arising by placing a levy on car parking spaces made available to employees. This levy may or may not be passed onto the end user of the space. The funds derived through this scheme have been used to enhance the quality of public transport provision. Dublin Town would endorse a similar scheme for Dublin.

Dublin Town would also advocate that the toll be lifted from the Tom Clarke Bridge to encourage people to avoid driving into the city centre.

9. Bewley's café

Dublin Town fully agrees with the views expressed about the importance of Bewley's café in relation to the Grafton Street experience and also in terms of the offer for the wider Grafton Quarter district.

10. Ref 11.11 Museum

Dublin Town would welcome the creation of a Museum of Urban Social History as outlined in the Plan.

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