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Dear Lord Mayor Chu,

The American Chamber of Commerce Ireland is grateful for the opportunity to comment on the strategic issues to be considered within the *Dublin City Development Plan 2022-2028*. The American Chamber is the collective voice of US companies in Ireland, Irish companies expanding in the US and organisations with strong bilateral links between Ireland and the US. With many of our members based in Dublin, the American Chamber is the leading international business organisation supporting the transatlantic business relationship. Our member companies, positioned at the centre of the world's two largest and most integrated economies - the US and the EU - are playing a critical role in Ireland and Dublin's economy and society. American Chamber members also play a vital role in their communities, supporting charities, schools, sporting organisations and community well-being.

Today, Dublin is one of the most open and innovative cities in Europe, welcoming people from across Ireland and the globe. The Dublin City Development Plan 2022-2028 is an important step in expanding Dublin's role as Ireland's flagship city, serving as a beacon for the entire country's attractiveness. An emphasis on high quality-investment and strategic planning will ensure that Dublin will continue to be an inclusive location-of-choice for talent and innovation with global impact.

The future of FDI will be inextricably linked to places where people want to live, as much as where companies want to go. The role of the office is changing – companies are starting to announce their future workforce transformation plans. This may change the calculations employees make about where they want to work live and work.

Dublin's attractiveness as an investment location is now more crucial than ever – we must continue to make Ireland a more attractive business location. There is a strong interdependence between the planning, development and creation of an agreeable living environment and enterprise development. People want to live where the surrounding infrastructure is supportive of work and lifestyles. Establishing a strong sense of place contributes to an environment which is appealing for entrepreneurship, multinational and local business investment.

Urban form, height and density

The Chamber welcomes the emphasis in the Consultation Paper on the role appropriate building heights and density plays in the creation of urban centres of scale with high standards of urban design and architecture. It is appropriate the future Development Plan considers specific areas within Dublin, including the key economic zones of the city, where increased building heights and appropriate density should be actively encouraged. These areas should have close proximity to public transport and emergency access, be supportive of a sustainable physical environmental and

be in keeping with the visual aesthetic of the area. Planning Guidelines should encourage the development of higher residential buildings to provide much needed additional housing and the promotion of economic development to well-located central urban areas.

Climate Action

The American Chamber fully supports the Government's ambition to transfer to a carbon neutral economy by 2050, as well as the EU's increased decarbonisation target of 55% emission reductions by 2030. Many of our members are aligned to more ambitious sustainability targets. The transition to a carbon neutral economy will require a whole of society approach, affecting how all of us live and work. Sustainability and the promotion of the circular economy should be at the heart of policy decisions affecting all sectors of the economy and should be a consideration in all state funded activities.

We would welcome a dialogue, involving all aspects of society, on how Dublin should best implement the various aspects of the EU's Green New Deal. Furthermore, the Chamber is calling for a comprehensive and inclusive roadmap outlining how all sectors of the Irish economy, with a particular emphasis on our capital city, will adapt to sustainably contribute to lowering Ireland's emissions, ensuring that ambitious target-setting by Government is matched with appropriate regard to how Ireland's future economic growth will be achieved.

Quality Housing and Sustainable Neighbourhoods

The provision of accommodation is a critical economic enabler that requires continued prioritisation of planning and capital investment. The delivery of the Programme for Government's housing commitments is imperative for Dublin to remain a location that retains and attracts world class talent.

It is necessary to commit adequate funding for the Land Development Agency and the Office of Public Procurement to ensure that the Dublin commitments in Rebuilding Ireland are delivered. Measures to encourage the pooling of planning resources between local authorities, the acquisition of expertise to deal with planning bottlenecks and the renewal of the Strategic Housing Development Scheme would be strongly welcomed by our members. Particular attention within the Development Plan should be paid to the changing size of Dublin's average household- as it converges to the European average, significant new housing demand will be created.

Dublin's accommodation market is characterised by strong demand but very weak supply. Ireland's stock of dwellings is disproportionately older and more rural than our European neighbours. Census figures demonstrate relatively high vacancy rates for residential property in Ireland, compared to other OECD countries. In the area covered by Dublin City Council the vacancy rate in the 2016 Census was 9%. The Development Plan should emphasise the importance of encouraging and creating affordable and attractive accommodation within Dublin city centre, where the necessary ancillary services are already in place.

Ancillary facilities - such as schools, affordable childcare, and transport links are also viewed as essential requirements for employment growth. We must make smart investments in our education at all levels. If we are to create, retain and attract world class talent, we must invest in world-class educators working in every community across the city realising the potential of everyone in our society.

Investment in childcare infrastructure and community family supports are vital to supporting

Dublin's workforce. Communities must have affordable access to the supports necessary to allow people, particularly women, to realise their potential and develop their careers.

Sustainable and multi-modal transport

A sustainable reliable transport system that includes access to shared and public transport is a key component in ensuring that Dublin is a great place to live and work. As the economy moves towards carbon neutrality, there is a need for a significant change in our mindset surrounding the modes, and role played by mobility as a service in Dublin. This change must be underpinned by a transparent and well-funded sustainable mobility policy that enables growth within the sector.

There is need for a modal shift in public transport to encourage increased use of sustainable methods of traveling within Dublin, with frequent accessible services available to citizens and workers 24 hours a day. In addition to advocating for large projects such as Bus Connects, MetroLink, Dart+ and expanding Luas cross-city, we are very supportive of increased cycling and walking infrastructure, micro-mobility solutions, the establishment of car-sharing infrastructure and of electrical technology supports.

Considerations should be given to the further integration of Dublin's different public transport systems, including micro mobility solutions, to better facilitate the first and last mile of commuters' journeys. In the short term we encourage the adoption of technical solutions, such as service pilots, to allay concerns over missed connections and overcrowding on connecting services. Furthermore, the policy should focus on the facilitation of safe cycling and walking cross, particularly within Dublin's urban villages.

International Connectivity

As a small, open economy, Ireland is crucially dependent on its aviation links. Prior to the COVID-19 pandemic Ireland had over 200 weekly flights to US destinations, with Dublin Airport providing access to over 200 global destinations. As global travel reopens Ireland must look to expand capacity for transatlantic routes as well as connections to European and international hubs. Significant capital investment will be necessary in Dublin airport as global aviation recovers from the current crisis- the development of Dublin Airport's new runway and delivery of Dublin Airport's Capital Investment Plan 2020+ will supply much needed extra connectivity.

Post pandemic, restoring and enhancing the transatlantic and global services available from Dublin airport will be essential for connecting enterprises in Ireland with their customers and partners worldwide. Dublin should ensure that our airport infrastructure, including transport links to the city centre, is best in class; the airport is the first impression that the business traveller will form when they arrive.

Utilities

The availability of high-quality affordable utilities plays a significant role in Dublin's competitiveness proposition as an investment location. Sustained commitment to capital expenditure is required to secure quality and affordable provision of water and wastewater services for Dublin. We recognise the scale of Irish Water's task, particularly the investment needed to modernise Dublin's water services and to meet the demand predicted by Project Ireland 2040. Dublin's capacity constraint is a risk to future industrial, as well as population, growth and must be addressed with urgency.

Our members are very conscious of the need to transform where we source our electricity and ensure the grid is prepared to support business growth. To enable this transition, the electricity grid

in Dublin requires significant upgrades - at present it is incapable of serving new large-scale customers or of accepting the volume of renewables we require to meet our national climate targets. The capacity of the electricity grid directly affects the ability of companies to grow and is currently leading businesses to divert their investments from Dublin to other competitor locations.

The urgency of delivering on the National Broadband Plan has been highlighted during the COVID-19 pandemic and the need for much of the population to work remotely. The delivery of broadband connectivity to urban blackspots and the roll out of faster internet speeds, is crucial to the economic future of the city. Ensuring that businesses are enabled to maintain operations during future crises and that small businesses can access their markets and suppliers digitally should be a key priority.

Culture

Dublin should continue to position itself as a centre of excellence for creativity and experimentation in the arts. Investment in cultural institutions, including libraries, theatres, and Cultúrlanna, have benefits far beyond their immediate impact; encouraging creativity that improves innovation and collaboration across society, science, and enterprise. The development of collaborations between the arts, technology and Ireland's renowned strengths in language and storytelling should play a central role as we plan creatively and effectively for the future. This will be crucial to attract new international audiences and future visitors, and in creating job opportunities in the creative and tourism sectors.

The Chamber strongly support the process of setting long-term strategic parameters for planning and investment. We appreciate the opportunity to inform the new Strategic Plan for Dublin and welcome any opportunity to assist further in this process.

Yours sincerely,

A handwritten signature in black ink that reads "Mark Redmond". The signature is written in a cursive, slightly slanted style.

Mark Redmond, CEO American Chamber of Commerce Ireland