
Dublin City Development Plan

American Chamber of Commerce (AmCham) submission
to the stage 2 consultation

February 2022

Chapter 1: Strategic Context and Vision

The American Chamber of Commerce (AmCham) welcomes the opportunity to contribute to the consultation on the draft Dublin City Development Plan 2022-2028. AmCham 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, AmCham 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.

Dublin is one of the most innovative cities in Europe, attracting and welcoming people from throughout Ireland, and across the globe who wish to visit, or to call Dublin their home. Dublin's attractiveness as a location benefits Ireland's competitiveness in attracting inward investment, and talent, on a national level. With smart policy decisions and strategic planning, Dublin will remain a location-of-choice for international talent and will continue to foster innovation which has worldwide impacts.

As AmCham will outline in its submission, the future of FDI will be as much about where people want to live as where businesses will wish to locate. As such, the linkages between the fostering of a positive living environment, growth in enterprise, and planning and development are strong. People want to live in places where the surrounding infrastructure is supportive of work and lifestyles. Furthermore, establishing a strong sense of place contributes to an environment which is appealing for entrepreneurship, multinational and local business investment. With the future of the workplace changing, it is essential that Dublin remains an attractive place in which to live and do business.

The Dublin City Development Plan 2022-2028 will be crucial in maintaining and increasing our capital city's competitiveness as a desirable location for talent, business, and inward investment into the future.

Through responses to the relevant chapters of the draft Plan, AmCham will outline its comments and key considerations focused on ensuring Dublin remains a competitive location for inward investment, and a location which is an attractive place for talent to live and work.

Chapter 3 – Climate Action

AmCham believes the inclusion within the draft Plan of the Council's policy to support the implementation of national climate action policy is positive. AmCham fully supports the

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

In supporting the transition to carbon neutrality, innovation in relation to greener energy solutions will be essential, particularly in terms of fostering an innovation eco-system which can actively contribute to the achieving our climate goals. Innovation is fundamental to the fight against climate change.

AmCham notes the Council's policy, outlined in the draft Plan in relation to energy from renewable sources which states that the Council's policy is *"to support the production of energy from renewable sources, such as from solar energy, hydro energy, wave/tidal energy, geothermal, wind energy, combined heat and power (CHP), heat energy distribution such as district heating/cooling systems, and any other renewable energy sources, subject to normal planning and environmental considerations."* AmCham is of the view that the rapid scaling up of energy from renewable sources is required to support the transition to a carbon neutral economy. This will require the adoption of modern technology with greater capacity and large-scale storage, and the development of additional grid capacity with increased interconnection points for new renewable energy projects.

The Covid-19 pandemic has shown the impact all of society working together can have, and the important role business can play in supporting society. Industry involvement in the fight against climate change is vital in terms of the circular economy. Business, government, academia, and wider society must work together to ensure we are successful, and this should be considered in the context of the Dublin City Development Plan. As we work to transition to a carbon neutral economy, it is important to be cognisant of the fact that businesses will have to transform. Supporting businesses in adopting new, greener technologies, and upskilling their staff will form a vital part of realising our climate goals.

AmCham has called for a comprehensive and inclusive roadmap which outlines how all economic sectors, and particularly our capital city, will adapt to sustainability measures which contribute to lowering Ireland's emissions and meeting the ambitious targets set by Government, while also outlining how future economic growth will be achieved.

AmCham will further outline its comments on mobility, sustainable transport, and electric vehicles in its response to Chapter 9 of the draft Dublin City Development Plan.

Chapter 4 – Shape and Structure of the City

AmCham notes the policy and objective outlined by Dublin City Council within the draft Plan in relation to urban density and increased height. AmCham considers that increased building heights and appropriate density should be actively encouraged in specific areas within Dublin. Such specific areas may include the key economic zones of the city. In this context, AmCham acknowledges the policy outlined in the draft Plan in relation to building height locations, which states *“to recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.”*

Areas where increased building heights and appropriate density should be actively encouraged should have close proximity to public transport and emergency access. They should further be supportive of a sustainable physical environment, and such developments should be in keeping with the visual aesthetic of the surrounding area.

Residential accommodation, and additional housing, is much needed in Dublin and, while AmCham will expand its comments on this in its response to Chapter 5 of this consultation, the development of residential buildings with increased height would work towards providing that much needed supply. As such, as AmCham outlined in its response to the stage 1 consultation, *“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.”*

Chapter 5 – Quality housing and sustainable neighbourhoods

Housing

AmCham is aware that the future of inward investment will be as much about where people want to live as it will be about where businesses wish to locate. The provision of quality housing is a key factor in ensuring Dublin remains an attractive home for talent.

The provision of accommodation is a critical economic enabler and, as such, requires the continued prioritisation of capital investment and planning. Ireland is not unique in facing a growing housing crisis. However, one of the aspects that does distinguish Ireland is the link between the availability of residential accommodation and our competitiveness as an inward

investment location. AmCham advocates for the delivery of the Government's housing commitments and views the provision of housing as an imperative for Dublin to remain a location that retains and attracts world class talent.

As AmCham outlined in the stage 1 consultation process, Dublin's accommodation market is categorised by strong demand but very weak supply. Furthermore, Ireland has a more rural, and older stock of dwellings than our European neighbours. AmCham also noted in its previous response that, within the Dublin City Development Plan, the Council should give particular attention to the changing size of the average household in Dublin which, as it converges to the European average, will result in significant new demand for accommodation.

In terms of tackling planning bottlenecks, as AmCham previously outlined, measures related to the pooling of planning resources between local authorities, and the acquisition of expertise to deal with planning bottlenecks would be welcome.

AmCham notes the Council's policy outlined in the draft Plan on the reduction of vacancy. In the context of derelict properties, AmCham is of the view that a smart strategy to bring these properties back to life would have a significant impact on the housing crisis, reinvigorate urban centres and towns and assist in the promotion of Dublin as an attractive location for people to live.

Sustainable neighbourhoods

It would be beneficial, within the Dublin City Development Plan, to ensure adequate emphasis is placed on the encouragement of the provision of affordable accommodation within the city centre, where the required ancillary services exist. Ancillary services are vital in ensuring Dublin is an attractive location for people to live, and as a result, for encouraging business growth. In addition to measures including the development of a 15-minute city, the provision of affordable childcare, adequate public transport connections, and the necessary school and education access are vital in Dublin remaining a destination of choice for talent, and future inward investment.

Supporting families, individuals, and those in employment must be a key consideration in terms of the development of sustainable neighbourhoods. Smart policy decisions on funding our education and research sectors and investing in education at all levels are necessary to retain and attract world-class talent to Dublin. Coupled with investment in childcare and in community and family supports, smart investment in having world-class educators in each community across the city will ensure that everyone in Dublin can realise their potential and this will support talent and benefit Dublin in attracting future investment. As AmCham previously outlined "*communities must have affordable access to the supports necessary to allow people, particularly women, to realise their potential and develop their careers.*" A flexible approach to pre and after-school

childcare, and other family supports, should be encouraged as people adapt a hybrid model of commuting to the workplace.

Chapter 6 – City Economy & Enterprise

AmCham welcomes the policy of the Council, outlined in the draft Plan on promoting and facilitating foreign direct investment. Working to promote and facilitate FDI into the city will have many benefits. In supporting and facilitating inward investment in Dublin, it is key to ensure our capital city is an attractive place for talent to live. In this context, the availability of accommodation and ancillary services will be vital, as outlined in AmCham’s response to Chapter 5.

Furthermore, the promotion of sustainability measures and action to support the Government’s climate targets and the transition to a carbon neutral economy, while also ensuring the necessary physical and digital infrastructure is developed, will be essential in ensuring Dublin remains competitive in attracting future investment. Greater energy supply from renewable sources, and investment in increasing Dublin’s energy capacity will be critical in catering for the energy needs of businesses, and the population, into the future. Investment in energy will be important in avoiding FDI being diverted to competitor locations, as AmCham will further outline in response to Chapter 9. Investment in Dublin’s water and wastewater infrastructure, broadband connectivity, and sustainable transport solutions will also be important in the context of Dublin’s continued competitiveness.

AmCham notes the focus in the Plan on *“establishing a positive and attractive ‘brand’ for the city.”* Dublin has developed a strong international reputation as a digital and regulatory hub. Ensuring the necessary infrastructure is in place, including sufficient energy supply for current and future business needs will be critical in maintaining the strength of Dublin as a brand, and in continuing to attract FDI.

Chapter 8 – Sustainable Movement & Transport

Sustainable transport and mobility

AmCham acknowledges the focus on sustainable mobility and transport in the draft Dublin City Development Plan. Sustainable and reliable public transport is important in making progress towards achieving carbon neutrality and in ensuring Dublin remains an attractive place to live and work.

In ensuring Dublin is a great place to both live and work, it is key that the transport system includes access to shared and public transport. Ensuring reliable and sustainable transport solutions are more widely supported is essential as society moves towards carbon neutrality, and in supporting sustainable transport solutions as a viable, and preferable transport option for the population. As AmCham outlined in its response to the Stage 1 consultation, *“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.”* AmCham notes the objective outlined in the draft Plan focused on the transition to more sustainable travel modes and the policy outlined on decarbonising transport.

AmCham reiterates the need for a modal shift in public transport accounting for the need to ensure citizens, and talent, have access to frequent services on a 24-hour basis. Commuters would also be benefited by the further integration of the various transport systems in Dublin, with the inclusion of micro mobility solutions, particularly with this being done in a manner which works to better facilitate the first, and last, mile of a commuter’s journey. In the short-term, AmCham would support the adoption of technical solutions, such as service pilots, which work to mitigate concerns over missed connections and overcrowding on connecting services.

AmCham notes that the draft Plan outlines Dublin City Council’s policies in relation to supporting walking and cycling. Facilitating safe cycling and walking must be a focus of the Dublin City Development Plan and this should particularly be a focus in the context of Dublin’s urban villages.

AmCham advocates for the delivery of key transport projects such as Bus Connects, Dart+, the expansion of Luas cross-city, and MetroLink. Furthermore, AmCham supports the increased provision of cycling and walking infrastructure, car-sharing infrastructure, and micro-mobility solutions.

Electric vehicles

AmCham notes the policy outlined in Chapter 9 of the draft Plan to support the expansion of the electric vehicles charging network. AmCham is of the view that significant investment is needed for the expansion of the charging network for electric vehicles, and measures to support the use of electric vehicles should be aggressively pursued. Furthermore, consideration must be giving to supporting the use of new technologies, including the roll out of hydrogen powered vehicles, and additional alternative technologies.

In the context of evolutions in low-emissions vehicles, AmCham is of the view that mobility policy must have enough built-in flexibility to allow it to react and adapt to the advancement of such transport solutions. Ireland, and Dublin, should position itself to be to the forefront of the

adoption of new, sustainable, and low-carbon transport technologies, including those which work to support multi-modal transport, and improve travel time predictions, and data analytics.

Chapter 9 - Sustainable Environmental Infrastructure and Flood Risk

Water and wastewater

AmCham is of the view that the availability of high-quality affordable utilities is important in the context of ensuring Dublin remains a competitive location for the attraction of inward investment.

Water and wastewater services are essential to ensure Dublin remains an attractive location for FDI, and AmCham believes a sustained commitment to capital investment focused on ensuring the delivery of quality and affordable water and wastewater services is vital. Given the demand predicted by Project Ireland 2040, and the scale of investment needed to meet this demand, AmCham is cognisant of the task of Irish Water in this regard. It is necessary to ensure Dublin's capacity constraints for water and wastewater services are urgently addressed to prevent such constraints acting as a deterrent to the continued growth of Dublin, both for industry and Dublin's population.

Energy

Energy capacity and supply is of the utmost importance in ensuring the attractiveness of Dublin as a location into the future. AmCham members are conscious of the need to increase capacity in the electricity grid, while also advancing sustainability goals, meeting national climate targets and supporting the transition to carbon neutrality. As outlined in AmCham's submission to the Stage 1 consultation process, *"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."*

Energy capacity must be developed to support business growth and investment in Dublin. Energy supply and capacity will be crucial in terms of Dublin's attractiveness into the future. By ensuring sufficient capacity is developed to support business needs, and the needs of the population, Dublin can avoid future investments being diverted to competitor locations due to energy concerns.

As AmCham previously stated in its stage 1 consultation response, *“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.”*

Broadband

AmCham is of the view the objective of the Council, as outlined in the draft Dublin City Development Plan *“to support and facilitate the delivery of the National Broadband Plan and international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland”* will be important in the context of Dublin’s continued competitiveness. The COVID-19 pandemic necessitated the advancement of digital solutions for businesses and talent. As a result, hybrid and remote working environments are likely to be commonplace into the future. In supporting business and talent, the roll out of broadband connectivity, and faster internet speeds, will be crucial to ensure operations can be maintained, markets can be reached, and people can work effectively from home. In this regard, AmCham believes there must be an urgency in relation to the delivery of the National Broadband Plan, and in connecting urban blackspots. Such action will be essential to the continued economic success of Dublin.

In terms of energy capacity, supply and security, the provision of water and wastewater infrastructure, and the delivery of the necessary broadband connectivity it is important that the Dublin City Development Plan ensures both conversation and action on these key utility matters occurs in a manner which supports business and the population in Dublin.

Chapter 10 - Green Infrastructure and Recreation

Sport, Recreation and Play

AmCham acknowledges Dublin City Council’s policies and objectives in relation to sport and recreation, as outlined in the draft Plan. More than ever, the pandemic has demonstrated the importance of a healthy work-life balance. AmCham is of the view that continued investment in sport infrastructure, including our traditional competitive sports, recreational facilities, and outdoor pursuits is vital in terms of ensuring our communities stay physically and mentally healthy. Sport has a fantastic ability to bring people together people from different communities and backgrounds, and future investment should seek to maximise access throughout Dublin.

Chapter 12 – Culture

As AmCham outlined in its submission to the Stage 1 consultation, *“Dublin should continue to position itself as a centre of excellence for creativity and experimentation in the arts.”* AmCham acknowledges the policies and objectives outlined within the Dublin City Development Plan in relation to the promotion of culture.

In continuing to attract people to Dublin, including international audiences and future visitors, along with increasing job creation in the creative and tourism sectors, supporting cultural initiatives and related collaborations will be essential.

Fostering creativity is crucial in terms of improving innovation, and in encouraging greater collaboration across enterprise, science, and society. As such, the importance of investment in cultural institutions is important, including in libraries, theatres and Cultúrlanna. Investment in cultural institutions can have wider benefits for society and business in fostering collaboration and innovation.