



**Submission on Ireland 2040
National Planning Framework
March 2017**

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Executive Summary

- Ireland faces an urban future, like all other developed economies. Government must prepare for this through proper planning and infrastructural investment. Urbanisation is an overwhelming global trend. Government should not attempt to stem the tide of urbanisation, but focus instead on ensuring that Ireland's journey towards an urban future is a positive one.
- To remain competitive in the global economy, Ireland requires a modern city region of international scale. The Greater Dublin Area (GDA) will continue to be the engine of Ireland's economy and home to a growing portion of the Irish population. National well-being will depend on the strength of a well-managed and globally competitive capital. In the short term this will entail a surge in investment to redress the existing infrastructure deficit and relieve the pressures created by past policy mistakes. In the medium to long term it will require a holistic development plan for the capital, overseen by a unified local government.
- A wider regional spread of economic opportunity can be achieved by providing alternative options for modern urban living at a distance from Dublin, but Ireland's small population means that achieving critical mass will be difficult. Success will require utmost selectivity. One way of achieving this is to develop an 'Atlantic Corridor' of smaller cities, comprising Cork, Limerick, and Galway, operating in a synergistic relationship with the national capital.
- Ireland should embrace the environmental, social, and economic benefits of higher urban density, and develop its cities on a continental model, learning from the mistakes made in Dublin and ensuring that they are not replicated in other urban areas. Low-density suburban sprawl should be stopped. In Dublin, building heights must be raised further in order to increase capacity within the city. On a national level, regional coordination will be required to establish a new trend towards urban density.
- Successful management of the urbanisation process means planning for where people will live and work, designing urban landscapes accordingly, and investing in the necessary infrastructure ahead of time. This will require a sustained increase in capital investment in public infrastructure.

1. Introduction

Dublin Chamber welcomes the opportunity to make a submission to the Department of Housing, Planning, Community and Local Government on the new National Planning Framework (NPF). Dublin Chamber is the voice of business in the Dublin region, representing 1,300 firms that employ 300,000 people across the Greater Dublin Area (GDA). With a membership base spanning the spectrum from small startups to major corporate multinationals, we are well positioned to reflect upon the needs of both businesses and their employees in the decades ahead.

Ireland has long been characterised by a strong sense of local identity. Reinforced by family, cultural ties, and sporting tradition, it will remain a distinctive feature of Irish life in years to come. Local identity has a positive role to play in contributing to community cohesion at a neighbourhood, parish, and county level. However, in a highly competitive and increasingly urban world economy, the long-term well-being of the Irish people will depend on their ability to transcend local divisions and put Ireland first. Dublin Chamber encourages Government to rise above political localism and pursue the national interest as it develops a new model for Ireland in 2040.

In this submission, Dublin Chamber makes the case for embracing urbanisation as a positive and inevitable trend, while supporting the prosperity of rural Ireland in its own distinctive sphere. An ambitious vision for the capital city region will have to be at the core of a successful national plan. The GDA, comprising the Dublin Region and the counties of Meath, Kildare and Wicklow, is the engine of Ireland's economy and its largest demographic hub. In terms of global trade and investment, what is lost to Dublin is very often lost to Ireland. Dublin should be supported and celebrated as Ireland's national capital and its only city of international significance. Beyond this, the Chamber supports measures to achieve a greater regional spread of economic opportunity in Ireland, while advising that these be informed by the practical reality of Ireland's small population.

Population growth will continue to be focused around urban areas in the future. It is in the power of Government to determine whether this growth is to the benefit of Irish cities or to their detriment. To make urbanisation work – both for Dublin and for other Irish cities – new approaches to urban planning will be required. Dublin Chamber makes the case for a major shift towards higher urban density to improve business productivity, the return on infrastructure investments, personal convenience, and quality of life.

Dublin Chamber envisions Ireland in 2040 as a nation that has managed its urbanisation process wisely, planned ahead and invested in world-class infrastructure, while preserving its traditional sense of community. We envision a dynamic country, represented on the global stage by a modern and competitive capital city region. The cities of Cork, Limerick and Galway have each learned from Dublin's mistakes by developing on a carefully planned and high-density basis. Enjoying good connectivity with the capital and with each other, they form a valuable corridor of economic activity on the West coast, offering alternative options for urban living. Ireland's thriving capital and three secondary cities support the network of

towns and villages throughout the country, and a rural economy that has adapted successfully to the circumstances of the mid-21st century.

Dublin Chamber looks forward to working with the Department to ensure that this vision of Ireland – with a successful Dublin at its heart – is realised. Dublin Chamber is already working on the creation of a long-term vision for the Dublin region, under our *Dublin 2050* initiative. We believe that this work will complement that being carried out by the Department under Ireland 2040. We look forward to sharing our own findings with all relevant stakeholders in due course.

2. Ireland's Challenge – Learning from the Past

The NPF is intended to be the successor to the National Spatial Strategy (NSS), which was planned to run from 2002-2020. It is widely recognised that the NSS did not succeed in delivering on its stated aims, and this was acknowledged by the Government in 2013 when it announced that it was scrapping the Strategy. The NPF is a valuable opportunity for Ireland to learn from the lessons of the NSS with respect to concept, design, and implementation.

The NSS attempted to ensure 'balanced' regional development by providing for a large number of demographic and economic counterweights to the Greater Dublin Area (GDA). Its vision for Ireland was based on nine large urban 'gateways' and a further nine medium-sized 'hubs'. Spreading the focus of regional development too thinly, it did not realistically allow for any urban centre outside Dublin to gain real critical mass. Moreover, subsequent Government policies (e.g. decentralisation) and resource allocation decisions were not consistent with the strategy, nor was it enforced at a local level. It is of critical importance that Ireland learns from this experience.

Ireland cannot afford another NSS. The long-term national interest must be the guiding principle of the National Planning Framework, while short-term, localist, or populist measures should be called out early and rejected forcefully. Urbanisation is not appropriate or possible everywhere. It is an inherently selective process, so there will always be strong differentiation between regions. The relationship between urban and rural Ireland should be complementary and synergistic rather than competitive.

The National Planning Framework should focus not on *balanced* but rather on *effective* regional development. All regions should aim to achieve their potential. However, it is important to note that each region has a different demographic potential. In this context, policymakers must recognise that the proportion of Ireland's population living in rural areas will continue to decline in the coming decades, while the proportion living in urban areas will continue to increase.¹

¹ United Nations Population Division, World Urbanization Prospects 2014 Country Profiles: Ireland, <https://esa.un.org/unpd/wup/Country-Profiles/>

3. The Future is Urban

3.1 The Unstoppable Tide of Urbanisation

For the first time in human history, the majority of the world's population now lives in cities.² It is in the nature of cities to provide an aggregation of labour, capital, and market access that is conducive to higher levels of economic output. Employment and other economic opportunities are greatest in urban areas as a result, and the overwhelming global trend towards urbanisation is accounted for by this simple fact. For well over a century, the world has seen a demographic shift towards cities as people move to the places where jobs are located in the greatest number, variety, and quality. As a result, the global competition for jobs, talent, and investment is now as much between city regions as between nation-states. Ireland's cities therefore play a critical role in driving national competitiveness

Rather than squandering limited national resources in an effort to combat a global and irreversible trend, Government should focus on getting urbanisation right. Ireland's rate of urbanisation has now reached the European average, and the United Nations estimates that by 2050 Ireland's population will be 75% urban. Ireland's proportional urban population will have then caught up with the European average of today, but it will remain below the average for its time and still markedly lower than the Northern European average, estimated to be almost 90%.³

Irish policymakers should accept urbanisation as a positive and inevitable trend, embracing the benefits that it offers. This trend is driven by ordinary people – not Government – and top-down attempts to restrain urbanisation will only prove counterproductive, undermining Ireland's economic potential and social well-being. The National Planning Framework must take heed of this. The aim of Government should be the effective management of the urbanisation process to ensure a good quality of life and the best possible level of service delivery for businesses and the communities in which they operate.

The decisions made in the National Planning Framework will determine whether the continued urbanisation of Ireland will be positive or negative. An intelligent and farsighted national plan will be needed to ensure that urbanisation brings the greatest possible benefit to Ireland as a whole.

3.2 Overcoming Anti-Urban Bias

The National Planning Framework represents an important opportunity for policymakers to overcome the conventional anti-urban bias in Irish political culture and to plan successfully for the future. In particular, the time has come for the Government to start allocating national resources in a way that respects and reflects where the Irish people actually choose to live in their largest numbers.

² UNFPA State of the World Population 2007, http://www.unfpa.org/sites/default/files/pub-pdf/695_filename_sowp2007_eng.pdf

³ United Nations Population Division, World Urbanization Prospects 2014 Country Profiles: Ireland, <https://esa.un.org/unpd/wup/Country-Profiles/>

Capital spending is more cost-efficient in urban zones where greater use will be made of completed projects, while concentrating multiple investments in a defined area has a synergistic effect with a positive regional overspill. Despite this, Government funding for new infrastructural projects is far from proportionate to the number of people who will benefit from them. Dublin receives the lowest level of capital investment in public infrastructure per head of any Irish region,⁴ while Dublin City Council, for example, spends less on roads than the national average, despite having to serve a denser population than any other area.⁵ The budgets for urban public transport projects such as Luas Cross City are substantially outweighed by funds allocated to rural infrastructure programmes such as the New Ross and Enniscorthy bypasses which will serve much smaller populations. This underinvestment in urban Ireland continues despite Ireland already having the sixth lowest level of metropolitan-rural inequality in the EU.⁶

This economic anomaly has negative social effects. Both among high-income and low-income groups, levels of life satisfaction are lower in Irish cities than in rural areas.⁷ Other research has found that Dublin has one of the lowest levels of self-reported life satisfaction in Ireland.⁸ The NPF should aim to provide Irish city-dwellers and commuters with the same high standard of urban living that can be expected elsewhere in Europe. This will require long-term planning and a commitment to finance vital infrastructural projects on the basis of demographic need rather than political expediency. The Government should look to countries such as Denmark, which consistently ranks as one of the top countries in the world in terms of the happiness of its citizens. There is strong evidence that the Danes' high level of contentment is a legacy of successive Governments having invested consistently and ambitiously in their people – in the form of transport and supporting services and other infrastructure.

3.3 Urban-Rural Complementarity

With wise management, the urban-rural divide need not be a zero-sum game. While the rural proportion of Ireland's population will continue to decline relative to the urban proportion in decades to come, this does not necessarily represent a commensurate fall in absolute numbers.⁹ And while rural Ireland may continue to rely upon the Greater Dublin Area to

⁴ E. Morgenroth, *The Regional Development Impacts of Transport Infrastructure*, 2014

⁵ PublicPolicy.ie, Dublin City, Comparison to National Average, <http://localauthorityfinances.com/average/7/>

⁶ Eurostat, Statistical Books, Urban Europe: Statistics on Towns, Cities & Suburbs 2016 Edition, p. 88, <http://ec.europa.eu/eurostat/documents/3217494/7596823/KS-01-16-691-EN-N.pdf/0abf140c-ccc7-4a7f-b236-682effcde10f#page=90>

⁷ Eurostat, Statistical Books, Urban Europe: Statistics on Towns, Cities & Suburbs 2016 Edition, p. 267, <http://ec.europa.eu/eurostat/documents/3217494/7596823/KS-01-16-691-EN-N.pdf/0abf140c-ccc7-4a7f-b236-682effcde10f#page=269>

⁸ UCD Briefing Paper for Comhar, Clinch et al, Understanding & Measuring Quality of Life in Ireland: sustainability, happiness and well-being, p. 56 http://researchrepository.ucd.ie/bitstream/handle/10197/875/ferreiras_confpub_002.pdf?sequence=1#page=19

⁹ United Nations Population Division, World Urbanization Prospects 2014 Country Profiles: Ireland, <https://esa.un.org/unpd/wup/Country-Profiles/>

generate the national income necessary to fund rural services,¹⁰ it can also thrive within its own distinctive sphere if a realistic national plan is put in place.

Rural areas cannot compete directly with cities for employment opportunities, but they can benefit from proximity to a strong urban region. For example, Eastern and Midlands counties such as Meath, Kildare, Carlow and Wicklow, as well as counties further from Dublin such as Louth, Westmeath and Laois, have become more attractive places to live and work precisely because of their proximity to a thriving capital. In the long-run, the most suitable development model to ensure the security and prosperity of rural Ireland is a balanced regional distribution of strong cities, whose extended hinterlands benefit from the outward spread of wealth, employment, and infrastructural development.

Meanwhile, rural regions should continue to strengthen their natural competitive advantage in important and lucrative national industries such as agri-food processing and tourism. Ongoing developments in information and communications technology will steadily reduce the requirement for geographic specificity in certain occupations, allowing a growing number of professionals, self-employed and technical specialists to work from small rural towns and villages if they so choose. Government should ensure that this option is viable by delivering optimum rural broadband access, giving priority to high-quality coverage in rural towns and villages.

The National Planning Framework should, however, take steps to discourage any further construction of one-off housing, which is both environmentally unsustainable and expensive for the State to service. At the very least, Government should ensure that the owner/occupier of such a development bears a greater share of its financial burden, thereby making it a more economically unattractive option for individuals as well as for the public exchequer.

4. Ireland's Future Cities

4.1 Dublin – Ireland's Gateway to the World Economy

In an increasingly urban world, Dublin is Ireland's representative on the global stage. The Greater Dublin Area is Ireland's only urban region of sufficient scale to compete with the world's great cities, and is Ireland's most attractive location for foreign direct investment and skilled workers from overseas. It produces over 53% of Ireland's GDP,¹¹ and accounts for 62% of Irish tax revenues.¹² As the engine of Ireland's economy, it is naturally the greatest centre of job creation. Some 859,700 people were employed in the Dublin region in 2016,

¹⁰ The only counties that contribute more to the public exchequer than they receive are the Greater Dublin Area counties, Cork, and Kilkenny. Source: Central Statistics Office (Feb. 2016), '*County Incomes and Regional GDP*', Table 1a [Estimates of Primary, Total & Disposable Household Income by Region & County in 2014]

¹¹ CSO Statistical Release 22 March 2017, County Incomes & Regional GDP 2014, Table 9, GVA per Region at Current Market Prices (GDP), 2006-2014,

<http://www.cso.ie/en/releasesandpublications/er/cirgdp/countyincomesandregionalgdp2014/>

¹² Revenue Net Receipts by County 2015, <http://www.revenue.ie/en/about/statistics/receipts-county.html>

representing over 42% of the total number employed in the State.¹³ Moreover, the growing importance of the services sector will continue in the years ahead, and this form of employment will remain overwhelmingly urban in focus as it tends to cluster in proximity to large markets and nodes of transport and communications.

Dublin and its extended hinterland will remain the most important international commercial and employment hub in Ireland over the next two decades. The region will play a crucial role in meeting both the needs of businesses and the personal and social aspirations of the people of Ireland. The strengthening of Dublin's business environment – and the continued improvement of the standard of living in the city – is therefore a national imperative. Irish policymakers should allow Dublin to lead for the country, and avoid any political temptation to undermine its valuable role. Dublin's success is critical to Ireland's success, and Government policy must reflect this reality.

4.2 The Importance of the Greater Dublin Area

The Dublin region is the heart of the Irish economy and Ireland's largest population hub. The Greater Dublin Area, comprising Dublin, Meath, Kildare and Wicklow, is currently home to 40% of the population of the State.¹⁴ In total, over 1.9 million people live in the Area,¹⁵ and that figure is projected by the CSO to grow to 2.2 million by 2031.¹⁶ The demographic and economic primacy of Ireland's capital will continue over the coming decades, regardless of any ill-conceived policies which might be proposed to undermine this. Dublin will remain multiple times the size of the next largest city in Ireland; its national role is similar to that of Paris in France, Copenhagen in Denmark, or Vienna in Austria. Policymakers must accept this reality and support Ireland's capital in its leading social and economic role, while also strategically developing other cities on a smaller scale to provide alternative options for modern urban living elsewhere in the country.

The Chamber sees the vital role that the GDA plays in Irish life as an unquestionable positive. It is important to note that given Ireland's small population, any moderately sized Irish city will be more proportionately significant, as a matter of course, than a city in a country with a larger population. Comparisons with the role of London in the UK, for example, are inappropriate as they ignore the enormous population differential between the Republic of Ireland (4.78 million) and the UK (65.1 million). Far from being a matter for alarm, the proportional strength of Dublin is a natural and inevitable statistical feature of urbanisation in a small country with limited scope for urban critical mass. Concern should not arise from Dublin's growth and success, but rather from the failure to plan for this success.

¹³ CSO QNHS Main Results, QNQ22: Persons aged 15 and over by NUTS 3 Regions, Quarter & Statistic, <http://www.cso.ie/px/pxeirestat/Statire/SelectVarVal/Define.asp?maintable=QNQ22>

¹⁴ CSO Press Statement 14 July 2016, Census 2016 Preliminary Results, <http://www.cso.ie/en/media/csoie/census/census2016/pr/COPprelim2016.pdf>

¹⁵ CSO Census 2016, EP001: Population & Actual & Percentage Change 2011-16 by Sex, Province County or City, Census Year & Statistic, <http://www.cso.ie/px/pxeirestat/Statire/SelectVarVal/Define.asp?Maintable=EP001&Planguage=0>

¹⁶ CSO Regional Population Projections 2016-31, Actual & Projected Population of Regional Authority Areas 1981-2031, <http://www.cso.ie/en/releasesandpublications/er/rpp/regionalpopulationprojections2016-2031/>

Dublin's importance to Ireland comes into even stronger focus when viewed from abroad. From a European and international perspective, Ireland is both geographically peripheral and demographically insignificant. Like Cyprus, Ireland is at a pronounced distance from the economic and industrial core of the European Union, and without adequate investment in its only major urban region, it risks becoming equally irrelevant. Moreover, the looming exit of the United Kingdom from the EU has the potential to significantly exacerbate Ireland's position as an outlier. While by far Ireland's largest urban area, from a global perspective Dublin remains a small city on the margins of northwest Europe. There is no room for complacency about the status of the Irish capital as a globally competitive location. An ambitious vision for Dublin, supported by a long-term investment plan, will be critical to enhance Ireland's competitive position so as to cope with the challenges and opportunities of the coming years.

Dublin Chamber encourages national planners in their efforts to promote a wider geographic spread of economic opportunities through urban living, but cautions that this must not be done at the expense of Ireland's only city of international note. The National Competitiveness Council has previously warned against attempting to 'redirect' economic growth away from Dublin, advising planners instead to focus on the inherent growth potential of other regions.¹⁷ Above all, Government must secure Ireland's position in the world economy by supporting Dublin as the only city-region that can represent Ireland in the increasingly global race for investment, jobs, and talent.

4.3 Planning the Future of the Greater Dublin Area

The Greater Dublin Area operates as one city region, and is an increasingly integrated economic area. However, the way that it is governed does not reflect this reality. The Dublin Region alone is divided into four local authorities, with four indirectly elected mayors who have little power and change every 12 months. This is un conducive to joined-up thinking and fosters unhelpful competition rather than cooperation. It undermines efficiency in the everyday workings of the city region, while making it difficult to form long-term plans for Dublin as a whole. Strong strategic leadership will be crucial to ensuring that Dublin maintains economic competitiveness in the years to come. Dublin Chamber supports an integrated system of local government for Dublin as a whole.

In planning the broader role of the capital in the nation's economy and society, a useful concept may be that of the 'Four Cities of Dublin'.¹⁸ The functional Dublin region effectively comprises four distinct and complementary zones that operate as a whole. These Four Cities of Dublin are deeply interdependent and will require a holistic plan for their future development.

- **The Centre City**, comprising the area between the canals. Containing the largest concentration of protected structures in Ireland, it is also highly dynamic and undergoing continuous transformation. As the location of Ireland's most important national

¹⁷ Forfás, National Competitiveness Council, *Our Cities: Drivers of National Competitiveness*, April 2009, p. 8, http://www.competitiveness.ie/media/ncc090421_our_cities.pdf#page=9

¹⁸ Model developed by Dr. Conor Skehan, Housing Agency

institutions, its future role will be a zone of valuable retail activity, cultural institutions, commercial and administrative headquarters, and urban amenities such as entertainment venues, cafes, hotels and restaurants. Given the strong demand for city living from staff aged under 35, the Centre City will have a particular role to play in bolstering Ireland's offering to overseas talent and FDI.

The Centre City is effectively a second home to people from throughout the Eastern & Midlands region, and planning decisions in this zone have a major ripple effect. However, much of this core area is not intensively used at present. Comprising a mere 14 km² out of Ireland's 70,000 km², land between the canals is an extremely finite resource of high national value, and it should be treated accordingly. Effective use must be made of the remaining city-centre sites to ensure maximum capacity, while continued investment in public transport and other sustainable modes such as cycling and walking will be vital to ensure that Dublin's Centre City is an easy location to get into, get out of, and to move around.

- **The Middle City**, comprising the area between the canals and the M50 environs. This is Ireland's largest contiguous area of housing. It should be gradually encouraged to approach higher levels of residential density, and supported by a compelling public transport offering based upon sustainable modes. People with growing and mature families tend to seek the greater space that is provided by more suburban environments, but will require an improved public transport network to allow quick and easy access into and around the Centre City.
- **The Edge City**, comprising areas of industry, housing, office and light industrial parks, recreational facilities and other infrastructural utilities in the general environs of the M50. The Edge City is at the heart of Ireland's current and future economy, possessing a high density of business utilities and the best transportation links. Continued investment in transport and other infrastructure will be needed to keep this area globally competitive. Policies should be put in place that will allow for lands within the M50 to be used in a manner that is most suitable to meeting the current and future needs of the city.
- **The Outer City**, embracing the area of low density suburban and rural housing and highly productive agricultural lands that comprises Dublin's broad catchment economy and commuter zone. This area will require improved rail connections to the Edge and Centre City to allow for uncongested commuting, while new solutions will be required to improve transport within the Outer City zone. In particular, an Outer Orbital Route should be developed to divert unnecessary traffic away from the Edge City while strengthening both regional and national economies.

4.4 A Small Number of Population Hubs for a Small Country

Ireland is small both geographically and demographically. As such, it only needs and can only sustain a very small number of large population hubs. Dublin's proportional strength and critical mass should be supported in the decades ahead to ensure that Ireland maintains at least one city of international scale and significance.

If the Government wishes to achieve a wider regional spread of economic opportunity, the aim of the National Planning Framework should be to cultivate a very small number of secondary cities with strong transport links to the capital, thereby offering alternative options for urban living,. Dublin will continue to lead the Eastern and Midlands region, regardless of any Government effort to the contrary. Therefore, national planners should work to improve regional development by strengthening a maximum of 2-3 other urban centres. These should be at a significant distance from Dublin in order to maximise their regional impact and avoid overlap with the Midlands and Eastern region.

Dublin Chamber believes that the cultivation of an alternative urban corridor in the West of Ireland should be considered. This urban corridor should be limited to the city regions of Cork, Limerick, and Galway - an Atlantic Corridor. The aim should be to facilitate the development of three distinct cities that have good connectivity with each other and with the capital, potentially offering themselves as public policy test-beds in the areas of urban design, transport, and environmental policy.

The combined populations of these Atlantic Corridor cities would be over 251,800.¹⁹ While this currently amounts to less than a fifth of the population of Dublin (1,273,000 in 2011), in the long term it would provide a basis for the critical mass required to become a significant corridor of economic activity. In order to achieve this goal, the Atlantic Corridor should operate in a synergistic relationship with Dublin. The National Competitiveness Council has acknowledged that a globally competitive Dublin will serve to strengthen the performance and attractiveness of other Irish cities and provide them with opportunities that may not be accessible otherwise.²⁰ In particular, improved inter-city transport links will be necessary to allow these cities to play to their own strengths whilst leveraging the international weight of the capital city.

5. Making Urbanisation Work

5.1 Learning from Dublin's Mistakes

In the past, Ireland has failed to properly prepare for urbanisation. Much of Dublin's economic expansion and population growth has taken place without adequate planning, and as a result the city region has developed in a rather haphazard fashion. As smaller Irish cities strive to share in Dublin's economic success, they must also take steps to avoid its costly mistakes. The NPF represents a valuable opportunity to ensure that future urban development is informed by Dublin's experience.

The lessons from Dublin's past should be incorporated into all future city development plans, and the NPF should establish sustainable planning principles to be implemented by all local authorities. Above all, the Atlantic Corridor cities must avoid replicating the model of low-density sprawl of the kind that has been allowed to occur in the Greater Dublin Area. They

¹⁹ CSO, Population of each Province, City and County, 2011, <http://www.cso.ie/en/statistics/population/populationofeachprovincecountyandcity2011/>

²⁰ Forfás, National Competitiveness Council, *Our Cities: Drivers of National Competitiveness*, April 2009, p. 8, http://www.competitiveness.ie/media/ncc090421_our_cities.pdf#page=9

should opt instead for a continental model of coherent and environmentally sustainable high-density development based on consistent long-term planning for where people will live and work. Residential, commercial, transport, and other infrastructural projects should be planned and delivered in tandem so as to minimise commuting times, maximise business efficiency and personal convenience, and optimise the overall urban environment and quality of life.

5.2 Sustainable Urbanisation – Consolidation through Density

With 75% of Ireland's population projected to be urban-based by 2050,²¹ the choices Ireland makes today will determine both the nature of its urban landscape and its quality of life for generations to come. The adoption of a sustainable urban development model is of crucial importance to long-term national well-being. Successful management of the urbanisation process means planning for where people will live and work, and designing urban landscapes accordingly so as to maximise personal convenience, economic productivity, and quality of life.

Low-density development is an unsustainable model and a significant contributor to Ireland's current housing, public transport, and infrastructure problems. It chokes off housing supply in the locations where people most want to live, and encourages urban sprawl and ever longer commuting times, reducing both productivity and quality of life. It makes investment in public transport economically unviable, while making other infrastructural investments less efficient and more expensive due to lower returns. All the while, it contributes to traffic congestion and carbon output by encouraging the overuse of private cars. Moreover, it is not necessary in order to preserve Dublin's pleasant scale and appearance. Many of Europe's most beautiful and liveable cities have rates of density significantly higher than that of Dublin but without dramatically different building heights. The NPF represents an important opportunity for Ireland to take a decisive shift away from this model of low-density sprawl, relieving future generations of its various negative impacts.

Dublin Chamber is a strong advocate for the environmental, social, and economic benefits of high urban density. Access to the services necessary for a prosperous and inclusive modern lifestyle now requires economies of scale that are only granted by dense urban living. Ireland's population is both growing and ageing, presenting challenges to public infrastructure and service delivery as Government works to improve quality of life and international environmental objectives. Well-planned urbanisation based on high density offers the only answer to the looming threats of chronic transport congestion and the increasingly difficult environmental questions that will be asked of Ireland in the coming years.

High-density planning also presents opportunities to design urban landscapes that strengthen social cohesion. Large-scale residential-only developments tend to encourage driving rather than walking, and risk becoming 'dormitory villages' with little community interaction. Once people make the decision to drive, longer journeys are less of a marginal

²¹ United Nations Population Division, World Urbanization Prospects 2014 Country Profiles: Ireland, <https://esa.un.org/unpd/wup/Country-Profiles/>

increase and people are more likely to drive to major urban centres in their car, reinforcing this effect. By contrast, building mixed-use areas reduces the need for transportation and makes inhabitants more likely to invest time and money in their local environment, increasing buy-in to the local community.

In pursuing this model, Dublin can capitalise on being a 'city of villages', many of whose distinct neighbourhoods retain their original sense of place. Much of what can be lost when people move from rural to urban areas can be preserved through a careful retention and promotion of this way of laying out our capital and other cities. The Danish concept of the '5-minute city', in which all major amenities are reachable quickly within a given neighbourhood, should be given particular consideration when designing smaller mixed-use zones of high density.

5.3 Achieving Urban Consolidation

Government should seek to reduce urban sprawl and establish in its place a positive trend towards urban consolidation. Rather than complacently assuming a continuation of past development trends and then reinforcing them through policy decisions, Ireland should take the opportunity offered by the new NPF to pro-actively determine the nature of its future urban development.

For example, current CSO projections indicate that the population of the Dublin Region will increase by some 285,000 by 2031, while the population of the GDA will increase by 400,000.²² This would represent a broad continuation of existing trends, in which growth within cities is relatively constrained while the surrounding areas outside a city see relatively heavy population growth on a low-density basis, leading to higher congestion and other diseconomies. Dublin Chamber believes that provision should be made for a much greater share of this population growth within the immediate Dublin Region itself, reducing expensive infrastructural pressure on the low-density hinterland while granting the city the benefits of greater density. Decisions made on housing supply in the Dublin Region will affect the entire functional region of Dublin, an extensive area embracing commuter counties throughout the East of the country.

Our principal recommendations are:

1. **Coordinate urban consolidation on a regional basis:** As CSO regional population growth projections assume a broad continuation of existing development patterns, they must not be used, in a circular manner, to justify the continuation of these patterns by policymakers. Rather, regional population projections should be used to highlight the need for a more sustainable distribution of population growth than would occur without government action. Complacent suburban sprawl must be stopped.

Urban local authorities must be obliged to accommodate a greater proportion of the population growth that is projected for their wider region, while being supported with

²² CSO Regional Population Projections 2016-31, Actual & Projected Population of Regional Authority Areas 1981-2031

the capital investment necessary to achieve these goals. Coordination between local authorities in this matter will require the active intervention of national government.

2. **Raise urban density and height requirements:** Dublin Chamber calls for national planning guidelines to mandate significantly higher density levels in all new urban developments, including an allowance for greater building heights in appropriate areas. A more prescriptive planning process will be necessary in order to ensure that other cities such as Cork, Limerick, and Galway do not repeat the mistake of low-density sprawl that has been made already throughout the Dublin region. Higher density requirements should also be applied in large towns and small villages, whilst being adapted to the distinct urban planning and architectural needs of such settlements.
3. **Link urban planning permissions to density targets:** Each local authority currently announces a Core Potential Residential Yield in its Area Development Plan, indicating the total capacity for new housing units on appropriately zoned land based on average rates of urban density. As outlined above, higher population targets and density rates will now be required in urban areas. To ensure that high density is achieved in actuality, new planning permissions for urban residential developments should be subject to the local authority making overall progress towards its target for residential capacity. Any planning permission granted which deviates significantly from the target average density must be balanced by a permission granted which deviates in the opposite manner.

There is a common misconception that increasing urban density implies the construction of overbearing skyscrapers on a large scale. However, this is not necessarily the case. The core of Copenhagen, for example, has a population density at least twice as high as that of Dublin, but with building heights only marginally higher (one or two stories). Copenhagen's successful development has been made possible through careful planning rules, cross-party political buy-in, and a strong commitment to an ambitious long-term urban plan.

Dublin Chamber recommends a pragmatic mixed approach for Dublin. The historical core of the city should be protected and its distinctive character preserved, while optimum use should be made of the remaining opportunities for new high-density development. In particular, sites at a remove from the Georgian core, such as the Poolbeg West Strategic Development Zone, offer a once-in-a-generation opportunity to compensate for the constricted capacity caused by poor planning decisions elsewhere in the city. Designs for such sites must be ambitious and allow for well-designed high-rise development that enhances Dublin's architectural landscape.

5.4 Getting the Foundations Right – Infrastructure

To develop Dublin and other urban regions, Government should learn from models of best practice in urban planning such as Copenhagen, where planners have followed a coherent cross-party policy of 'infrastructure first'. Ireland's traditional model of laissez-faire residential and commercial development, followed by sporadic capital investment in infrastructure after the fact, cannot be allowed to continue. It undermines economic potential and

competitiveness, reduces quality of life, and leaves Ireland in a permanent state of catch-up with respect to its public infrastructure needs. This tendency was perhaps understandable in the context of a historically agrarian economy that did not experience the major socio-economic disruption and innovation of the Industrial Revolution or the concomitant necessity for large-scale urban planning. The Ireland of the 21st century, however, is a very different place, with a young and diverse population that wishes to enjoy modern, clean and well-connected city living.

Proper urban development requires both long-term planning and a stable commitment to financing vital infrastructural projects. In the same way that Copenhagen's highly successful Finger Plan, first developed in the 1940s and then refined and implemented over the following seven decades, has provided the foundations for the city to become one of the world's most attractive and competitive cities in which to live and do business, the National Planning Framework has the potential to do the same for Ireland. However, unstable capital investment patterns have undermined Ireland's ability to plan its cities effectively in the past, and a shift in policy will be required if future urbanisation is to be managed consistently. Government should explore alternative financing models for major infrastructure projects, paying particular attention to the role of private finance or public-private partnerships, in order to ensure a more stable flow of capital investment in the future.

As the demographic, economic, and transport hub of Ireland, Dublin has a critical role to play in meeting the country's overall infrastructural requirements. The current traffic congestion and other pressures being experienced by the capital region cannot be blamed upon the city's economic success relative to other parts of Ireland; they are rather the result of poor long-term planning and historic underinvestment by national Government. The NPF should aim to fundamentally change this, with a view to benefiting Ireland as a whole.

A successful plan for the GDA will take into account the full spectrum of infrastructure needs, from world-class transport and communications facilities to the softer infrastructure that makes a city region pleasant and liveable. Appropriate educational and healthcare facilities, entertainment, leisure, and cultural spaces will all be vital to ensuring that Dublin remains a thriving and internationally attractive capital. With regard to housing, the National Planning Framework must ensure joined-up thinking in terms of where the houses are built and how the transport network is developed.

Many of the big infrastructure investments required in the GDA will have a major national impact. The National Competitiveness Council has stated that enhanced city performance has positive spill-over effects on the country as a whole, and that prioritising investment and initiatives to develop the competitiveness of our cities is a most effective use of Exchequer funds.²³ Dublin Airport, for example, is of paramount importance to the country's global connectivity. With over 80% of overseas visitors arriving through the facility,²⁴ it is effectively

²³ Forfás, National Competitiveness Council, *Our Cities: Drivers of National Competitiveness*, April 2009, p. 7, http://www.competitiveness.ie/media/ncc090421_our_cities.pdf#page=8

²⁴ Dublin Airport, *North Runway – Potential to connect, compete and grow*, <https://www.dublinairport.com/docs/default-source/North-Runway-Docs/potential-to-connect-compete-and-growd6ad438b73386836b47fff0000600727.pdf?sfvrsn=0>

Ireland's national airport. Improved connectivity to Dublin Airport will thus be an imperative for the entire island in the years ahead.

National infrastructure projects that Dublin Chamber believes needs to be prioritised over the coming years are:

- **A direct rail link between Dublin Airport and the capital city centre**, connecting Ireland's global aviation hub with the wider national rail network, whilst easing urban congestion by serving the rapidly growing North County Dublin area.
- **Dart Underground**, to connect Dublin's busiest train stations and thereby unify Ireland's rail network, connecting Dundalk to Tralee and Sligo to Waterford.
- **An Outer Orbital Motorway** to ease the pressure on Dublin's road network, including the M50, and to allow people to better travel nationwide without the need to enter the confines of the capital.
- **An Eastern By-Pass** to complete the M50 ring road, cutting out the need for cross-city car journeys and reducing congestion.
- **Completion of the Eastern & Midlands Water Supply Project** to provide certainty of supply to businesses and residents throughout the Eastern & Midlands region.
- **Improved inter-city public transport networks**, to connect the Atlantic Corridor cities reliably with the national capital and with each other, while reinforcing the proposed shift towards urban consolidation through high-density development.
- **Improved public transportation in urban areas**, including expansion the tram network where it is sustainable. In low-density areas that are unable to sustain more advanced public transport solutions, greater provision should be made for bus services through priority and dedicated bus lanes and improved bus shelters.

Synchronisation of planning and project delivery will be vital to minimise the length of disruption to businesses and communities, and to ensure that the impact of projects is optimised.

6. Conclusion

The NPF represents an invaluable opportunity to shape Ireland's landscape in way that improves economic competitiveness and quality of life for generations to come. Dublin Chamber will continue to make the case for the Greater Dublin Area and for well-managed urbanisation. The Chamber is currently developing a long-term vision for the Greater Dublin Area, based on consultation with a broad spectrum of business and community stakeholders. This project, entitled *Dublin 2050*, will form the basis of the Chamber's future proposals on the development of the capital city region. Dublin Chamber looks forward to participating in the rest of the NPF consultation process and to engaging with the Department of Housing, Planning, Community and Local Government in the months ahead.