



DUBLIN TOWN GENERAL ELECTION MANIFESTO

2024

Now or Never for Dublin City Centre

Dublin is at a pivotal moment. Footfall is trending downwards. The public believe the city experience is deteriorating. They don't feel safe in the city and they want change.

DublinTown believes that we can systematically reverse these trends and improve confidence and engagement with the city where all key stakeholders work together to implement change and address underlying concerns.

The report of the Taoiseach's Taskforce for Dublin provides the blueprint to achieve this. We are now requesting that all political parties make a commitment to the full implementation of the Taskforce report in their general election manifestos and further commit to the inclusion of the taskforce's 10 Big moves as a non-negotiable item in any subsequent programme for government. By doing this, we are confident that we can reclaim the city for Dubliners and our visitors.

This is the key ask of all parties from the city's business community.



Introduction

This is a time of great change and uncertainty. Climate change, technological advances (most notably the evolution of Artificial Intelligence), and geo-political uncertainty are all impacting on Ireland's small open economy. Global structures and institutions are experiencing stresses not seen since the ending of the second world war.

This global uncertainty particularly impacts Ireland, given our reliance on foreign direct investment and positioning as an EU member that has traditionally punched above its weight.

Ireland's cost base and competitiveness have struggled in recent years. Our national debt of €223bn¹ and debt to GNI ratio of 76% are too high and must be systematically reduced. However, we simultaneously have infrastructural deficits which must be bridged, if we are to compete in the global marketplace and if we are to meet our carbon emission targets. There has rarely been a more urgent requirement to create current budget surpluses to meet these demands.

The future of sustainable energy generation provides opportunities for Ireland, which has traditionally imported fossil fuels to meet our energy needs. We have also proven to be well placed in maximising our potential in a global knowledge economy.

The competitive advantage that we have carved out from careful construction of our tax code is under pressure. This pressure can be anticipated to grow as technological advances place increasing strain on global tax law that has defined taxation residence for both individuals and more importantly corporations for over 100 years.

Aligned with this, 80% of funds invested in Ireland are sourced on the international markets. While we are not seeing investments unwind, we are not

seeing Ireland topping the list of places in which to invest either. This situation is not ideal and must be addressed for Ireland to be re-established as an investment friendly location.

As a business improvement district, DublinTown is acutely aware of the changes to town centre usage that are being experienced across the world. Retail, which for generations dominated international downtowns is in retreat. While 10 years ago shopping was Dublin city's greatest draw, it is now the fifth most popular activity within the city. Work from home is resulting in office oversupply, particularly for sub-prime office space. Home working has deprived town centre businesses of vital mid-week trade internationally, while providing a shot in the arm to out of town shopping malls which were struggling to stay relevant before the pandemic.

The resultant vacancy provides new opportunities to increase town centre residential accommodation together with new arts, leisure, hospitality and entertainment offerings which will meet changing consumer habits. However, this potential will only be realised with careful planning. Ireland must follow other countries in taking town centre management more seriously to ensure that our cities provide the social and economic platforms required.

A lack of vision and forward planning has resulted in Dublin under-performing its peers across almost all important indices. The Taoiseach's Taskforce for Dublin provides a blueprint for regaining the initiative. It is imperative that the recommended policy decisions are made and that the appropriate investments are undertaken.

¹As at December 2023



Dublin City Taskforce

Dublin is under-performing relative to its peers. Studies show that people do not feel safe in the city and find that it is becoming increasingly inaccessible. Over the course of the 20th century Dublin experienced a hollowing out of its residential population.

Many of the issues that face Dublin city centre have been addressed by the Taoiseach's Taskforce for Dublin. The taskforce has laid out 10 big steps which we believe correctly analyse the challenges and opportunities facing Dublin. If implemented in full, we believe the city will experience a reversal of its fortunes and will be put on a solid road to recovery.

Research confirms that Dubliners love their city and wish to see its pride restored. We believe that positive momentum will be quickly grasped and built upon by the public.

DublinTown calls for an implementation group, with an independent chair, to be established to ensure that the taskforce's recommendations are realised. We see the NEIC model as one that can be replicated in this regard.

Strengthening local democracy

Ireland is overly centralised. In 2018 only 9% of public expenditure in Ireland was channelled through local Government compared with an EU average of 38.8%. If Dublin is to thrive then local decision making ability must be strengthened to European norms. A report on relative performance of Dublin versus European peers commissioned by DublinTown from Dutch firm Blossity noted that the public do not see a sufficiently clear connection between their vote and local decision making. This in turn

"The mismatch we see in Dublin between local (decentralised) and national (centralised) power when it comes to urban development is unparalleled in other European cities. While many capital cities outperform their national counterparts in terms of how progressive, entrepreneurial and effective they are in policy making (and implementation), this is not the case in Dublin due to a lack of mandate at city level. Strengthening local democracy, including revenue generation through local taxation, is the only way to drive urban regeneration in specific neighbourhoods in Dublin."

undermines the democratic process. DublinTown recommends that a commission is established to consider local democratic structures and revenue raising autonomy fit for the 21st century to strengthen local decision making in Ireland.

The Governance structures applied in Ireland are now clearly limiting progress. The straight jacket that Dublin is being crammed into is suffocating it. Local Government in Ireland follows the principle that one hat fits all but clearly the opportunities and threats that face Dublin will be different to those facing rural towns with populations of less than 30,000. Dublin needs governance structures electorally and administratively that allow it compete on the international stage. If Dublin remains stifled, the whole of Ireland will pay a large price.

DublinTown advocates for greater autonomy to be placed in the hands of elected representatives who will have revenue raising authority.



A need for a new Local Authority funding system

Local Authority funding must be brought into the 21st century. The pandemic demonstrated how obsolete and redundant the rates system is. It must be replaced with local revenue raising authority consistent with modern circumstances. Prior to the recent UK election the Labour Party promoted the idea of using a combination of an online sales tax and a land tax to replace rates. DublinTown recommends that the matter of local authority funding be considered by a commission to establish a fair and practical system of local Government revenue. We do not believe that central government should have a role in determining the nature or extent of funds raised which we believe should be subject to the local democratic process.

Safety

Anxiety regarding safety is keeping Dubliners out of their city. Research reveals that the public has little confidence that the state is either willing or able to address its concerns and take the appropriate remedial action. Dublin city centre has an over-concentration of homeless and drug services. This has assisted the development of a drug market on core city streets. The Talbot Street district which is a public transport hub has the largest concentration of services. A mere 9% of the public state that they feel safe in the district after dark. Employees wish to leave

work early to avoid waiting for public transport at night there. If the heavy concentration was beneficial for service users, there would be an argument that current practices should continue. However, professional care givers also criticise how we are caring for the most vulnerable members of society. A more logical and rational strategy needs to be found.

There are also a large number of unregulated charitable groups providing on-street services in high profile locations within the city centre. DublinTown believes that charitable groups should operate under a licensing system where licenses are provided to meet recognised need. People working with vulnerable members of society should be subject to Garda vetting. The provision of food services may divert people from availing of more integrated services where the totality of their needs can be addressed professionally. DublinTown also has concerns that the provision of services on busy streets does not fully respect the dignity of service users. We believe that supports should be provided in discrete off-street locations.

Additional Gardaí are required in Dublin and elsewhere. However, it would be naïve to assume that a Garda presence alone is enough to address the totality of public safety concerns. The underlying reasons for poor perceptions of safety must also be addressed.

The city's business community are dismayed when people who have stolen from their businesses and abused their staff are given suspended sentences and are back within hours again, abusing and assaulting staff. There is a need for increased provision of prison spaces for repeat offenders.



DublinTown supports the Juvenile Liaison System, which regularly diverts 75% of participants from trouble, meaning they do not come to the attention of the Gardaí again. However, there is a cohort of individuals who do not take the opportunity provided. In these instances, there is a need for increased interventions such as exclusion orders and curfews to help ensure that these young people are not drawn into greater criminality.

The greater use of safety wardens in public pedestrianised zones can provide additional comfort for the public. Such a scheme has been successfully piloted in Dublin and we believe a widening of the programme warrants consideration. We believe that these wardens should be enabled to enforce bye laws facilitating low level corrective action.

Aggressive begging has been an unfortunate aspect of anti-social behaviour for some time. The provisions of the Criminal Justice (Public Order) Act 2011 have not decreased the level of aggressive begging and solicitation of money with menace in our towns and cities. It is clear that persistent and aggressive begging should be made an offence.

Across the world the use of Crime Prevention Through Environmental Design (CPTED) principles have assisted in creating a more welcoming environment for visitors particularly in newly pedestrianised areas. We advocate for increased use of CPTED in the design of the public realm in Dublin.

Retail Crime Strategy

An unfortunate recent development is the large increase in retail crime including theft from the shop, all too often accompanied by intimidation and/or assault on staff. There is clearly a need to develop a national retail crime strategy to address the core issues and to protect retailers.

Decriminalisation of drugs

Engagement with peer cities where drugs have been decriminalised has led DublinTown to reconsider its position regarding decriminalisation. Feedback provided to us, suggests that decriminalisation has led to increased serious mental health challenges including psychosis and challenging behaviour. While we agree with the health led approach, we are concerned by the level of misinformation relating to drugs, including cannabis, which downgrades the negative mental and physical impacts that drug use has. We believe that any further steps towards decriminalisation must be accompanied by structured education in the harms associated with drug use. We further believe that access to drugs must remain regulated and limited to the fullest extent possible.

Access

Despite enhancements in the public transport system in Dublin, the public feel that the city is becoming increasingly difficult to access. This is particularly the case amongst those over 65 and those with the longest commute.

80% of visitors to the city use sustainable transport to arrive here. Out of town shopping centres, have the exact opposite profile. There is a danger that focusing on city centre traffic only,

will result in the favouring of more car dependent out of town locations. DublinTown advocates for an integrated traffic plan for the Dublin region that will include road pricing. We believe that a system that charges for road use based on time spent and distance travelled, such as that used in New Zealand and Singapore should be instituted. This, we believe, would be the fairest system for all and the one most likely to reduce overall emissions. Based on research findings we believe that a congestion charge for Dublin city centre would actually increase emissions by encouraging customers to travel long distances to alternative locations.

There will be less vehicles in our cities and this needs to be better planned for in terms of deliveries and repair services. Dublin needs a detailed delivery strategy that will include shared last mile deliveries both to and from the city. We will have to consider emergency repairs. For example, if a restaurant's freezer breaks down, there is a limited time period available to repair it before food stock has to be thrown out. We should use digital twinning and AI tools to consider the potential impacts of traffic changes to create the most workable solutions for most people. The pedestrianisation of Capel Street has not been as successful as its proponents claim. There are a number of practical issues which we believe could and should have been addressed at the planning stage that have created very real problems for businesses. We need to learn from these mistakes.

Ultimately, we need to promote sustainable transport for people visiting Dublin city. Many of the requirements are included in the NTA's plans for Dublin. However, we simply cannot wait until 2042 for many of these core elements. The proposals must be fast tracked.

Many people choose not to visit the city at night due to their fears about getting home safely. This emphasises the need for night transport and additional encouragement for late night taxis.

Promotion of city living

International experience notes that the towns and cities that made the quickest recovery following the pandemic were those with the best balance and mixed use.

Irish towns and cities lack the residential populations of our European peers resulting in a lack of passive surveillance. This is despite the fact that the 19th century building stock, which dominates much of our town landscapes, was built with above the shop living in mind. However, extension of retail space at ground floor deprived many of these buildings of their stand alone residential entrances, while fire and access regulations have meant that above the shop units lie empty while a housing crisis plagues the country.

Other European cities have addressed the fire access issues in buildings which are less amenable to 21st century living. We need to adopt similar pragmatic responses in Ireland. These include integrated fire and sprinkler systems and bringing properties to the market noting that they don't meet 21st century standards but are of their time and provide a certain quality of accommodation. By doing this we will bring thousands of square feet of usable space back into active use.





Work from home

Dublin has a lower rate of office attendance than peer cities. Firms want their staff back in the office. This is particularly true of global firms, including tech companies. In this context the supports for workers to stay home will, in our view, be ultimately seen as folly. While transport emissions may be helped by more home working, home heating costs are ultimately likely to prove more challenging when it comes to total emissions. DublinTown advocates for the reversal of supports which encourage employees to work from home.

Positive Energy Districts

Long term sustainability is likely to be a key attribute in determining investment locations in the near future. Dublin will have to step up to the plate in this regard. While we are taking measures to reduce vehicle movements, there is more to be done in moving to sustainable sources for heat and electricity. Net zero offers Ireland the opportunity for energy self-reliance and a chance to ease our dependence on fossil fuels procured from unstable parts of the world.

While sustainable electrical production is increasingly achievable, we need to focus on sustainable heat generation. The use of the BID model in the development of Positive Energy Districts warrants further consideration. Heat generation is likely to be localised using geothermal, tidal river movements, heat from sewers and similar sources. Given the nature of heat use, generation from local sources is likely to be of

increasing importance. The localised and inclusive nature of a BID would facilitate the development of appropriate models while enabling local business communities to work with state agencies such as SEAI, local authorities and other relevant bodies. The public discourse on sustainability has not focused on the positive potential of carbon reduction. The narrative must change if we are to get broader public support. To become a truly sustainable city, there must be full public-private engagement. The collective effort will yield benefits, however, the structures to facilitate this must be put in place.

Encouraging investment

It is estimated that 80% of the funds invested in Ireland are sourced from international markets. While we are not seeing the unwinding of investments, we are not seeing Ireland topping the locations for investment as it did before. We can regain the initiative where Dublin becomes an attractive option once again. This will take effort. The issues of concern for investors are manifold. Planning in Ireland is subject to long delays, while there is too much uncertainty in relation to planning outcomes. Other European countries have more detailed plans for their cities which provide greater clarity in the planning process. Ireland needs to consider similar initiatives. The planning process needs to be overhauled. There is widespread concern that the Planning and Development Bill 2023, is too long and cumbersome and will get tied up in the judicial process, thus rendering it ineffective. It is clear

that a root and branch review of the planning process is required including the extent to which judicial reviews are used to delay and derail viable and necessary projects.

Rejuvenation

The Talbot Street district needs re-invention. The district is the entry point for many into the city as a major public transport hub. The district suffers from poor perceptions of safety, employers note that staff do not wish to wait for their transport there. If we are to encourage greater public transport use, we need to address these concerns and create a more welcoming environment for people visiting the city. This requires the better integration of Connolly Station and Bus Áras into the district, the decluttering of social services and the upgrading of the streetscape. There is a role for the business community in supporting new building uses and embracing meanwhile uses. The district is prime for the use of CPTED principles.

The district has never delivered upon its potential as a link between the IFSC and the city's commercial core. There is scope to address this through the underpass at Connolly station and by softening the Amiens Street/Talbot Street junction.

In the longer term given the presence of the Abbey Theatre and LAB in the area, we should consider the greater use of the arts in the regeneration process. This would see additional art galleries, craft studios and artist studios being brought into the district. Certain vacant buildings will require new uses. We envisage community and performing arts uses in these spaces.

The district is ideal for the promotion of Living Over The Shop. We believe that the district is an ideal pilot area to trial a derogation from regulations which are preventing the conversion of derelict and under-utilised space into productive accommodation. This will require the piloting of financial supports to make it happen.

More broadly, we wish to see the re-development of the O'Connell Street area. DublinTown supports the Dublin Central development and was pleased to see this receiving planning approval from An Bord Pleanála. In our view the plans strike the



right balance required to achieve the long-term vibrancy of the district and to connect the northern commercial core to the proposed Parnell Square site.

DublinTown supports the introduction of residential uses into the commercial core, however, we stress that commercial uses must be maintained at ground floor level in order to facilitate engagement and vibrancy within the district.

Dublin currently has an office vacancy rate of 18.1%, one-quarter of which is considered grey space, i.e. space that is held under a lease but is considered excess to requirements and which the lessee wishes to release back to the market. With work from home patterns and adjustments in the tech sector it is unlikely that there will be sufficient office demand in the market for this space to be used. The market overhang is particularly acute for non-prime office space. While a change of use from office to residential use appears logical, property owners state that the costs of conversion exceed the potential rental income, meaning that it is in the economic interest of the property owner to leave the property vacant rather than convert it to residential use. Grant support will be required to bridge the current funding gap. Other cities have used their laneways constructively. We need to do the same. Dublin City Council engaged Seán Harrington Architects to look at a laneway strategy as part of the Dublin One process. We believe that the concepts for turning what are currently negative spaces into positive destinations, that link the city, have enormous potential and should be implemented in full⁴.

⁴Dublin One laneways report- We Are DublinTown



Re-municipalisation of waste collection

The privatisation of waste collection has not worked in Dublin. We need to seriously consider the remunicipalisation of the service. While accepting that EU law makes this more challenging, a long term workable solution needs to be found.

Each evening waste bags lie on Dublin Streets until almost midnight. They are subject to interference from seagulls, vermin and people looking for refundable bottles and cans. This is giving rise to rubbish strewn streets, creating the impression of an uncared for and dangerous city. This must be addressed.

There are serious issues at play. EU membership has been very beneficial for Ireland, however, that does not mean that the EU is above criticism. Policy errors must be capable of correction and the barriers to re-nationalisation and re-municipalisation are examples where it can be in the public interest to reverse previous decisions. EU competition law is hindering informed decision making and must be challenged.

We would strongly advocate against any further privatisation of services or utilities based on this experience, including any proposals within the transport sphere.

Taxation policy and the business cost base

Small businesses are struggling. Government policies are adding significantly to the cost base of

retailers and hospitality businesses, energy costs have risen and general inflation has hit the cost of sales. However, many businesses have faced reluctance from customers to pay more. This has led to reduced margins and greater risks for the company.

Government pressure on wage costs via increases to the minimum wage; compulsory sick leave; and auto pension enrolment have all come at the same time. This has brought added pressures onto consumer facing businesses at a time when town centre footfall is declining.

It is clear that we need to consider the cumulative impacts of regulations in the future, in particular when a number of interacting regulations are proposed to be introduced at the same time.

In this context, DublinTown advocates for VAT reductions which we have stressed for some time should be given in preference to reductions in income tax and USC. Town centres play an essential social as well as economic role for communities across the country. They need support. DublinTown advocates VAT rates of 20% and 10%. The headroom that lower VAT rates would provide to businesses may well be the difference between them closing and thriving in the long term.

Many businesses are still struggling to meet debts established during the pandemic, including tax warehoused debts. DublinTown has continuously advocated for an extension of the pay back period for these debts and still believes that this should be considered a priority.

Investment in the future

The generation of current account surpluses in recent years is very welcome. The allocation of these surpluses will be a key consideration for the next Government. There is no rational reason for utilising these temporary surpluses to meet short term or recurring expenditure. The options available include:

- Reduction of the national debt which currently stands at €223bn or c.76% of GNI
- The development of a fund to meet future expenditure, for example pensions of an aging population
- To address Ireland's infrastructural deficits.

We need to reduce the debt to GNI ratio to below 60% to provide headroom for the time when the economy will face shocks and disruption. Given the delicate geo-political position that we face at present, this may come sooner than we think.

Ireland also has a number of significant infrastructural deficits which must be addressed. These are in the areas of transport, water and sustainable energy generation. A failure to address these infrastructural deficits will hinder social and economic progress in the coming years.

Transport

There is an urgent need to upgrade our public transport systems and active travel options. The NTA's plans need to be accelerated dramatically. The urgent priorities include:

- Metrolink
- DART extensions
- DART Underground
- Luas extensions to Finglas and Lucan
- The delivery of night transport across all modes
- Maintaining reduced fares and introducing kids go free at weekends
- Faster roll out of sustainable cycle routes
- DublinTown supports the development of a parking levy on free car parking provided by employers. This levy would be met by the employer, who could re-charge it to the employee where agreed. Revenues derived from this scheme should be ring-fenced and used to improve public and active travel infrastructure.
- DublinTown supports the phasing out of overly generous mileage allowances which encourage private car use for business purposes. We believe that the use of public transport should be prioritised for business purposes. For example travel allowances should cover the cost of using public transport and incidental expenses while supports for the use of private cars should be phased out.
- DublinTown advocates for the introduction of a 3 day tax saver ticket to support workers who are working on a hybrid basis.

DublinTown advocates for pilot funding to be made available to assist in the development of shared last mile delivery schemes using cargo bikes and electric delivery vehicles. We also advocate for shared home delivery services, which would enable the public to visit their local town centre using sustainable transport and have goods delivered home using emission free vehicles. This model





would facilitate town centre based retail and would support the hospitality, entertainment and arts sectors, playing a significant role in sustaining town centre vibrancy. Ultimately this would be paid for by businesses and customers, however, there is a need to prove the concept and this will require pilot funding.

Water infrastructure

Dublin's economic and social development is dependent on investment in the city's water infrastructure. While improvements have been made, daily consumption is still far too high a proportion of production. In 2018, the city's drainage and sewerage systems were overrun with effluent escaping into the Liffey and Irish Sea. Climate change will result in an increasing incidence of such events. We need to upgrade our fresh and waste water systems to avoid similar consequences in the future. We believe that it was an error to cancel water charges. The polluter pays principle must apply to all finite resources.

Airport Cap

DublinTown has major concerns with the implications of the airport cap. This artificial reduction in airport numbers will have significant economic impacts on Dublin. At a fundamental level, almost one-fifth of consumer spend in Dublin city is provided by tourists.

We also have to consider the implications for inward investment and international access which are essential for a city which is forging its identity as an important international hub. We can't afford to become a global backwater at this critical time.

It is estimated that the drop of 1m passengers will result in an economic cost of €4bn for the national economy. This is a sum that we simply cannot afford to absorb.

Data centres

Ireland needs to remain a destination for inward investment. Our climate gives us some advantages in the IT sector. Data centres are likely to play an important role in the sector going forward. We need to address our power generation potential to ensure that we can maintain our position as a key location in the global IT industry. Closing off the potential for data centres is likely to appear short sighted in the long run.

Invest in vocational skills

Ireland needs to develop its vocational education. Traditionally Ireland has favoured academic over vocational qualifications. However, this approach has led to skills shortages in key trades, including catering and construction. These deficits must be rebalanced if economic progress is not to be stifled.



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