Submission to Draft Dublin City Development 2022-28

Policy Relating to Views and Landmarks

An Taisce requests the retention of Policy SC7 of the 2016-22 Plan - *"To protect and enhance important views and view corridors into, out of and within the city, and to protect existing landmarks and their prominence"* - which has been omitted from the current Draft Plan. This is an important policy and is complementary to Fig. 4 of the current Plan (Fig 4-1 of the Draft Plan) - *Key Views and Prospects.*

Liffey Quays

As raised in An Taisce's submission to the pre-Draft consultation, the Liffey Quays is inadequately provided for in the current or Draft Plan in reflecting its status and position as a central civic spine, historic townscape and defining feature of the city, and the salient need for the improvement of the area as a public space. It is recommended provision relating to the Liffey Quays is significantly expanded and enhanced in the new Plan in this regard.

Pole and Sign Clutter

Much concern has been voiced by the public and in the media recently about the levels of pole clutter in City Council's administrative area. Tough and effective action is needed to regulate, reduce and minimise the profusion of galvanised aluminium poles used for sign-mounts, camera-mounts etc., as well as flagpoles, electricity boxes and other cluttering paraphernalia that has accumulated in the streets, which has been worsening in recent years. Combining signs to reduce the number of poles in a given location, and use of black poles rather than galvanised aluminium in historic city-centre streets, needs to be utilised.

Tubular Fencing to Rooflines

As raised in An Taisce's submission to the pre-Draft consultation, inclusion in the new Development Plan of policy or provision relating to the roofs of buildings in the city, the "fifth facade" of a building, is desirable.

Erection of fencing or fenced walkways to the city's rooflines has proliferated in recent years (much of it not exempted development and erected without planning permission), and can significantly adversely impact on and visually impair streetscapes, views, rooflines and building silhouettes and the architectural quality of individual buildings (see example below)

Predominantly, tubular galvanised aluminium is used in the erection of fencing around the roof perimeter of many of the city's commercial buildings, new and old, and usually at the very front of the roof. Planning Enforcement has been ineffective in tackling this thus far.

Provision example:

'The city council recognises the clean intersection of building parapets and the sky as an integral visual characteristic of the city's built form which should be protected. Fencing, or

fenced walkways, at the parapet or roofline of buildings can result in visual injury and impairment to this characteristic, and to the architectural integrity of buildings, the streetscape and views. Such fencing to roofs and parapets, will not be permitted without the benefit of planning permission.'

This could be inserted next to section 15.18.5 (Telecommunications and Digital Connectivity) in Chapter 15.

Furthermore, the provision of guidance for how any necessary roof balustrading or fencing might be accommodated where it might be deemed appropriate or justified - eg. setting fencing back from the parapet and the providing of guidance on its design, materials and appearance with a view to avoiding visual impairment of the roofline, streetscape, or architectural quality of buildings - is needed.

Extant unauthorised fencing additions need to be pursued and resolved.



Ulster Bank, Lwr. O'Connell Street, within ACA



Before and After, Wellington Quay