An Taisce
The National Trust for Ireland

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Block 4, Floor 3,
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11 December 2015

Re: SUBMISSION TO DRAFT DUBLIN CITY DEVELOPMENT PLAN 2016-22

Chapter 3 of Draft Plan – 'Addressing Climate Change'

This chapter should include a section encouraging and emphasising the need for reuse, rather than redevelopment, of existing buildings of all periods. Existing buildings should always be kept in use and thermally improved rather than redeveloped as the projected energy savings of a new building will never overcome the massive environmental footprint of demolition and redevelopment of an existing one.

Chapter 4 of Draft Plan – 'Shape and Structure of the City'

Objective regarding Views for Protection

Objective SCO4 of the Draft Plan – to undertake a study to prepare list of key views and prospects for protection – is carried over from the current Plan (Objective SCO6). It should be progressed without delay.

View from North Terrace of Royal Hospital Kilmainham, Dublin 8

The *Heuston Framework Development Plan* document (2002) identified a 'Cone of Vision' from North Terrace of the Royal Hospital Kilmainham into which development would not be allowed encroach. The 'Cone of Vision' ran from the Royal Hospital to the

Department of Defence headquarters (Royal Infirmary building) to the east and to the Magazine Fort, Phoenix Park, to the west.

Under subsequent planning permission Ref. 2656/03 / PL29S.206528, which was permitted in 2004 for a period of 10 years, development was allowed encroach into the Cone of Vision on the east side.

As a result, the view from the Royal Hospital indicated 'Key Views and Prospects' in Fig. 4 of the Dublin City Development Plan 2011-17' is turned in a westerly direction away from the Department of Defence building and the original cone line, and this representation has been carried into the current Draft Plan.

The aforementioned permitted development encroaching on the Cone of Vision was however not executed and the 2004 permission expired in 2014. Thus the indicated view northwards from the Royal Hospital terrace should now be adjusted to reflect the original Cone of Vision from the *Heuston Framework Development Plan*, and having regard to the pre-eminently important Royal Hospital building and its landscape setting and views.

Axial view to Wellington Monument along North Circular Road

The planned axial view towards the Wellington Monument along North Circular Road should be included in the views indicated in 'Key Views and Prospects' map in Fig. 4, Chapter 4 of the Draft Plan (to be subsequently enhanced and strengthened as 'protected views').

Chapter 11 of Draft Plan – 'Culture and Heritage'

Policy CHC1 (Protected Structures)

Policy CHC1 should include a reference to protection of the "setting" of Protected Structures.

Policy CHC14 (Historic Paving and Street Furniture)

The words *"where possible"* should be removed from Policy CHC14, and the date of the document referred to in this policy should be '2009', not '2008'.

There are significant shortfalls in the implementation of the standards set out in the Public Realm Strategy and Historic Street Surfaces reports in achieving a consistent treatment across the city and protecting the city's historic paving, as borne out by the

ongoing use of cheap chinese white granite to repair the city's paving (refer to *DUBLIN'S HISTORIC FOOTPATHS BEING 'DESTROYED' BY CHEAP GRANITE* – The Irish Times, August 12, 2013)

A Plan will be needed for reinstatement of historic paving and kerbing to appropriate high standards (at College Green and elsewhere) further to Luas Cross City and to ensure a consistent, high quality treatment appropriate to the city centre across the affected areas.

Policy FC28 of Current Development Plan

This policy refers to the Architectural Heritage Protection Guidelines for Planning Authorities and states:

> *"To continue to protect our built heritage, development proposals affecting the built heritage will be assessed in accordance with the DoEHLG document "Architectural Heritage Protection Guidelines for Planning Authorities, 2005*".

This policy would need to be included in the new Plan.

Retention of non-protected and non-Conservation Area buildings

The Built Heritage section of Chapter 11 of the Draft Plan places a lot of emphasis on Protected Structure and Conservation Area provision. While welcome, reference should also be made to the desirability and sustainability of preservation of buildings of merit which may not be protected or within a Conservation Area – eg. paragraph 7.2.5.1 of the current Plan, which states:

> *'The retention, rehabilitation and reuse of old buildings can play a pivotal role in the sustainable development of the city.'* (Promoting Sustainable Development in Conservation)

And also Policy FC27 which commits:

> *"To seek the preservation of the built heritage of the city that makes a positive* contribution to the *character, appearance and quality of local streetscapes and the sustainable development of the city*"

It is recommended that these provisions are included in the new Plan.

Chapter 16 of Draft Plan – 'Development Standards'

Digital Photomontages accompanying planning applications or EIS

Traditionally, development was assessed by means of measured architectural drawings and / or perspective drawings and the scale model. In recent years the submission of substantial collections of digital colour photomontage has assumed a central role in the presentation of development proposals for assessment. In view of the potential for subjectivity in this area, provision should be included in the Development Plan.

The following paragraph, appearing section 17.1.1 of the current Plan, does not appear in the equivalent section of the Draft Plan (16.2.2.1):

> *"In certain circumstances models of a scheme will be required to an appropriate scale. All photomontages submitted with planning applications or with an environmental impact statement must include details of the type of camera and the lens used to create the image."*

It is recommended that the paragraph should be reinstated in section 16.2.2.1 of the forthcoming Plan in the following amended form:

> *"The planning authority will encourage the submission of development models to an appropriate scale. In photomontages submitted with planning applications or with an environmental impact statement, proposed development should be clearly depicted and should be clearly distinguishable from existing adjacent development, the sky and the surrounding environment. In order to represent how development will appear on an average day, excessive sunshine and blue sky should be avoided. Neutral lighting will be preferable."*

Section 16.7 – 'Building Height in a Sustainable City'

Amid the chaos that has characterised Irish planning over the last 60 years, there was at least one achievement of maintaining Dublin as one of Europe's low-rise major historic cities.

The table indicating maximum heights in section 16.7 is problematic. A "Low-rise" building in Dublin's Inner City, where consistent and coherent heights are a defining feature, would mean a building of maximum 20m, not 28m (four-storey Georgian buildings are approximately 14m).

As a quintessentially low-rise city, clearly the scale and character of the Inner City should not have heights greater than 20m foisted upon it. The scale and character of the receiving context should be the deciding factor in determining height.

The wholly excessive provision of 13 areas permitted for construction of high buildings, including all of the Docklands, is in stark contrast to Frankfurt, Germany, which limits heights to 20m and which has a small, limited number of areas allowing increased height.

Very high densities can be achieved at six storeys (Note recent housing scheme at Darbishire Place, Whitechapel, London by Niall McLaughlin Architects).

Having regard to the survival of a low-rise, human scale (across the classical Georgian planning and medieval areas) in Dublin's Inner City, the height definitions and limits contained in the Draft Plan need to be amended to reflect overall heights of buildings in the city.

The Assessment Criteria for Higher Buildings in section 16.7 of the Draft Plan should include the following two bullet points (which appear in the current Plan):

> "· *Consider the impact on the scale and quality of existing streetscapes, spaces and buildings.*
>
> · *Consider the impact on protected structures, conservation areas, and the architectural character and setting of existing buildings, streets, and spaces of artistic, civic and historic importance, in particular, the buildings relationship with the historic city centre, the river Liffey and quays, Trinity College, Dublin Castle, the historic squares and precincts, the Phoenix Park, the Royal Hospital Kilmainham and the canals."*

<u>Removal of 'Guiding Principles' chapter (Chapter 16) of current City Development Plan</u>

We are concerned about the removal of this chapter from the Draft Plan (some parts of which been subsumed into other chapters). The following provision from Chapter 16 of the current Plan should be represented in the new Plan:

Paragraph16.1.3, Making Successful Streets:

> *"Building frontages should provide appropriate enclosure to streets. They should have consistent heights relative to existing buildings and their plan form should prioritise the provision of a consistent building line, giving enclosure to the street or space."*

Paragraph16.1.4, Proportions and Enclosure:

> *"It is an objective of the Council to promote streets and public spaces which are human-scaled, are memorable as places which have a high standard of amenity. The relationship of Dublin's street facades to the human scale is recognised as a major attraction of the city. It is a policy of Dublin city council that new buildings*

should be designed and sited with a view to maintaining this important characteristic. The height of buildings relative to the width of a space is an important consideration affecting sunlighting and also the sense of being in a traditional street. For large developments (e.g. occupying more than 20m of street frontage) the height of buildings and how they positively relate to the scale of other buildings along the whole length and on both sides of the street must be demonstrated."

Paragraph16.1.10 points to the appropriate treatment of significant buildings. It states:

"Most buildings must work quietly and collectively as a backdrop or foil, providing a setting for those buildings that have legitimate call to be distinctive."

Paragraph16.1.11:

"To minimise the waste of embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new-build."

Criteria in paragraph16.4.1, among which are:

- *"All high buildings must be of the highest architectural quality and should aim to have a slenderness ratio of 3:1 or more and have regard to the existing urban form, scale and character, and the built heritage of the area.*

- *High buildings should be associated with significant open space, to promote appropriate setting, daylighting and amenity."*

General

Liffey Quays

Provision relating to the Liffey Quays is currently inadequate in reflecting the status and position of the river and the buildings fronting it as a central civic spine and defining feature of the city, and the salient need for improvement of the area as a public space. It is recommended provision should be significantly expanded and enhanced in this regard.

Conservation Areas and Architectural Conservation Areas

The Thomas Street & Environs ACA

The Thomas Street & Environs ACA should be extended eastwards to cover the medieval area around Back Lane, and should be extended westwards to cover the north

side of Thomas Street, west of Bridgefoot Street and as far the Crane Lane junction (no live redevelopment permissions exist in this location).

Newmarket Conservation Area

The Newmarket Square Conservation Area, Dublin 8, should be extended to include Brown Street South (east of Brickfield Lane), Weaver Square, Chamber Street, Mill Street, Mill Lane, Ward's Hill, St. Luke's Church and Brabazon Row (and including that section of Ardee Street which adjoins).

The Dublin 8 area in the vicinity of Newmarket was an industrial quarter in the 18th century and is rich in history. The sequence of streets and spaces of Brown Street South, Weaver Square, Chamber Street, Newmarket and Ward's Hill is essentially unchanged from Charles Brooking's map of of Dublin of 287 years ago. This historic street pattern was unaffected by the adjacent St. Luke's Avenue and Coombe bypass. Significant elements of historic fabric remain in these streets.

The Heart of Dublin, Peter Pearson (O'Brien Press, 2000) describes the area:

> *"The greater part of the Liberties stretching from Cork Street down to Blackpitts and across to the Coombe was once a densely occupied area that was both residential and industrial … To the west, Ormond Street and Chamber Street gave access to the Weaver's Square, a forgotten part of old Dublin that was once lined with with gable-fronted houses of early eighteenth-century date. As the name implies, these houses were erected mainly by Huguenot weavers who lived and worked in this area. Chamber Street ran southwards into Newmarket, which was a long narrow square laid out in the late 1670s and lined on both sides with houses. A few industries still operate there now, though new apartments are being built, especially at the eastern end. A short street named Ward's Hill connected Newmarket with Blackpitts, where there were many tanneries."* (p209-210)

In view of the historic urban significance of the surviving street plan and fabric and the desirability of recovering and enhancing its authentic qualities and ensuring that new development is of appropriate scale, design and quality, extending of the Conservation Area designation (which currently covers only Newmarket Square) is warranted.

<u>Woodlands House, Clonshaugh, Dublin 17</u>

The land-use zoning and conservation provision for this significant historic house and grounds should reflect the intact historic landscape by creating a buffer zone between the adjacent residential conservation area and industrial area by zoning public open space to function as a woodland reserve for biodiversity (current natural woodland regeneration is in progress).

Schedule of Non Statutory Plans

The ‘Schedule of Non Statutory Plans’ included in Appendix 1 of the current Plan (listing 19 area plans) is omitted from the new Draft Plan. These plans would need to be listed in the new Plan.

Fencing to rooflines

Suggested provision for Chapter 16 of the Draft Plan:

‘The city council recognises the clean intersection of building parapets and the sky as an integral visual characteristic of city’s built environment. Additional fencing or other clutter to rooflines and parapets, resulting in damage and visual injury to this relationship, will not be permitted.’

Tree Planting

Actual planting of trees (in the ground) as opposed to box planters, trees etc. should be favoured.

City’s Built & Natural Heritage

The following paragraph from Chapter 3 of the current Plan should be represented in the Draft Plan:

> *"Through this priority the development plan fully recognises that Dublin's built and natural heritage is both a major contributor to the city's character and is a unique resource that attracts tourism and the creative economies." … "The city's built heritage makes it unique. Key to the approach of thisplan is the balancing of the needs of a growing, dynamic city with the need to protect and conserve the elements that give the city its identity." (*Paragraph 3.3.1.4 - Core Strategy of current Plan)

Regards

Kevin Duff
Dublin City Association

Appendix 1

Submission re Appendix 19 - ‘Outdoor Advertising Strategy’, Draft Dublin City Development Plan 2016-22