



**Dublin Chamber submission on
'Dublin City Development Plan 2011 – 2017: Outdoor Advertising Strategy'**

January 2012

Key Points:

- Sustainable and appropriate advertising can play an important positive role in the architecture and character of cities.
- A balanced approach must be taken in relation to outdoor advertising in the city, with full consultation and collaboration with industry.
- There should not be an outright ban on all advertising in certain geographical zones within the city.
- No actions should be taken which impose a financial cost on businesses by either losing a historic advertising tool/ outlet, or imposing conditions that tie businesses up in wasteful bureaucratic practices.

The Dublin Chamber of Commerce welcomes the efforts being undertaken by Dublin City Council to "generate public realm improvements without compromise to the character of the city." It is important to have a vision for the public space in the city which puts the experience of people at its centre, encourages economic activity to thrive and protects Dublin's historic past and high quality architecture.

Dublin Chamber believes that advertising can play an important positive role in the architecture of cities. Many of the issues that arise when discussing outdoor advertising in Dublin city relate to the wider public realm. Dublin Chamber's thoughts on the future development of Dublin's public realm have been outlined in our recent submission on 'Your City, Your Space: Draft Dublin City Public Realm Strategy'. A copy of this submission can be found in appendix one.

Dublin Chamber welcomes and agrees with the recognition by Dublin City Council that all areas in the city are not the same in terms of architectural, historical and cultural sensitivity. Thus, we support the proposal to manage an effective programme of outdoor advertising based on geographical zones, as we believe that certain forms of outdoor advertising are more suited to certain locations in the city. However, we do not support the proposal of the City Council to outright ban all advertising in certain locations within the city: "Based on these zones a range of controls and policies have been developed for each zone ranging from the prohibition of outdoor advertising in the most sensitive areas to more general controls in less sensitive areas where certain types of advertising will be considered."

Instead, we encourage the City Council to take a balanced approach, and consult and collaborate closely with industry to facilitate the delivery of sustainable and appropriate advertising in each zone (if necessary) that does not compromise the character of the city.

Visual quality is important and the de-cluttering of certain areas by removing “unsightly and outdated advertising structures” may be necessary. However, Dublin Chamber will not support any actions taken on the part of the City Council which impose a financial cost on businesses by either losing a historic advertising tool/ outlet, or imposing conditions that simply tie the business up in wasteful bureaucratic practices. Instead the City Council must work with industry to ensure that at all times the appropriate size and quality of advertising displays are available to meet the needs of industry. Hence we do not support that proposal that “the City Council will promote the phased removal of existing ninety-six sheet and forty-eight sheet advertising panels as part of the overall enhancement of the public realm” without first fully engaging with industry and agreeing that these large ad panels are no longer a required marketing tool.

Appendix One:



Dublin Chamber submission on 'Your City, Your Space: Draft Dublin City Public Realm Strategy'

January 2012

The Dublin Chamber of Commerce is supportive of the efforts being undertaken by Dublin City Council to "define what is meant by 'public realm' and why it matters" and to "influence its future through the development of a vision, appropriate policy and through a collaborative approach that has people at its centre." We welcome this opportunity to input into the draft public realm strategy for Dublin City.

The heart of Dublin is a unique, vibrant, dynamic location, populated with different audiences who have a variety of contrasting infrastructural needs, and competing views of how the limited space in the city should be prioritised. But whether you are a tourist, shopper, office worker, student, business owner, senior citizen, transport or utility provider, it is important that the city centre continues to develop in a sustainable manner that encourages economic activity to thrive and conserves and protects Dublin's historic past and distinctive character.

Dublin Chamber believes that a holistic approach to the public realm must be taken, with the basis of all future development focused on people and their experience when entering and moving around the city. Dublin City Council and all agents developing and delivering services in the city centre must focus on hard visible issues – such as advertising equipment, signage, street furniture – and equally on soft issues that impact on the vibe of the city – such as does one feel safe? Is our culture and history easily to experience?

Every effort must be made to deliver balance amongst the competing interests for the limited public areas in the city centre, and 'best practice' from other great international cities must be applied to ensure we are getting the best fit for Dublin's unique needs.

Consequently, Dublin Chamber broadly welcomes the content of the draft Dublin City Public Realm Strategy on the overarching strict condition that:

- Businesses can continue to operate effectively and are not adversely affected (financially or by wasteful bureaucratic practices) during the efforts to better manage and enhance Dublin's public realm;
- The business community is fully consulted on any plans to change the layout of the existing limited road space for pedestrians and vehicles; and,
- All changes are properly communicated to the media and general public as a counterpoint to any misleading information which might damage the attractiveness and/or competitiveness of Dublin city.

Positive specifics within the draft Strategy:

- Dublin Chamber welcomes the establishment of a cross-departmental multi-disciplinary Public Realm Coordination Group within Dublin City Council to work with project delivery teams that are working in/ delivering on the streets of Dublin. As the City Council correctly identifies, many people use Dublin city centre, design it, build it and manage it. So it is important that there is a single entity responsible for coordinating the activities of all departments in Dublin City Council, public agencies, private developers and citizens to ensure everyone is adhering to an agreed vision for the city centre.
- Dublin Chamber welcomes the focus on the safety, orientation and accessibility of the city for all users, whether one lives, socialises, visits or works in Dublin.
- Dublin Chamber welcomes the placing of people at the very heart of the Strategy.
- Dublin Chamber continues to support the vision of the Dublin City Development Plan 2011-2017 which is one of a sustainable, dynamic and compact city with a distinct character, a vibrant culture and a diverse, innovation-based economy.
- Dublin Chamber welcomes the proactive approach the City Council proposes to take to collaborate with private owners to resolve the negative impact vacant, derelict or undeveloped sites have on the public realm.
- Dublin Chamber welcomes the commitment in the draft Strategy to give “particular consideration...to how spaces are experienced at night and how design can improve this experience” so that users feel safe. The Chamber agrees with the City Council that alternative approaches which deal with the roots of antisocial behaviour need to be taken.
- Dublin Chamber welcomes the creation of a design manual of design guidance and coordinated specifications for materials, furniture and other public realm fixtures to inform and coordinate developers, utilities and others involved in public realm works.

Elements of the draft Strategy that Dublin Chamber has concerns about:

- Dublin Chamber agrees with the City Council that too much clutter (street furniture, signage etc.) can have a negative impact on the public realm and user’s experience of it. We agree that visual quality is important and that there should be enforcement and de-cluttering of certain areas where necessary. However, Dublin Chamber will not support any actions taken on the part of the City Council which negatively impact on businesses from a bureaucratic red-tape or financial perspective.
- Dublin Chamber does recognise that “funding of public realm improvements or maintenance is an issue in the current economic environment”. However, Dublin Chamber will not support any attempt to place this funding burden on the business community through increased rates or other service charges.
- Dublin Chamber acknowledges the proposals to upgrade and regenerate certain areas in the heart of the city. In advance of any upgrades commencing, Dublin Chamber calls on the City Council to take full accountability and responsibility for works being carried out on their behalf. The City Council must take control and management of contractor’s time on site to protect business activity in the area and prevent pedestrians from permanently re-routing to alternative locations. All proposed regeneration projects must have a short, coordinated construction period.
- The Dublin City Development Plan 2011-2017 has a strong focus on the promotion of walking and cycling, with this focus continuing in this draft Strategy. The commitment by

the City Council is to encourage walking, cycling and public transport as the primary modes of travel in the city. Dublin Chamber does recognise that the city's traffic network is at capacity, however if the City Council is to realise the aim of 'keeping the city open for business', then the needs of all users must be accommodated - commuters, transport providers, cyclists, pedestrians, business traffic and private vehicle users alike.

Dublin Chamber does recognise that this draft Strategy must fit within the National Transport Authority's draft transport strategy for the Greater Dublin Area for the period up to 2030. Thus we reiterate the messaging containing in our submission into the National Transport Authority's draft Strategy made in April 2011:

"The transport network of the Dublin City Region needs to be significantly upgraded through the delivery of the rail projects outlined in Transport 21 and the Eastern Bypass if it is to become an integrated system that would realistically encourage a modal shift to public transport. Until there is an integrated public transport network in place, discussions regarding the imposition of penal measures on private vehicles must cease....

The hierarchy of transport users does not give sufficient recognition to the fact that car based shoppers, diners, tourists, concert and theatre goers are a critical component of Dublin city's ecology and economy. Failing to acknowledge the role that private vehicles play in the life of the Dublin City Region will be detrimental to the retail, leisure and tourism sectors, and could lead to Dublin city becoming a donut city with an empty city centre. Dublin Chamber does not support the proposal in the Strategy to consider capping "the numbers of car parking spaces on an area-wide basis...the use of such a measure should also be considered at major trip attractors such as large third level institutions, Dublin Airport, and other such developments."

Dublin Chamber calls on the NTA to recognise that shopping is a discretionary activity, and any perception of inconvenience caused by disrupted travel patterns due to restrictions placed on private vehicles will simply result in individuals selecting alternative locations to shop rather than promote a move to public transport. Indeed, the weight of a weekly grocery shop for a family will nearly always make the option of moving to public transport unfeasible for most shoppers."

Conclusion

Vibrant cities are created by catering to the needs of people. Dublin is home to a diverse audience, who have different expectations, different infrastructure and service needs, and who want different experiences. This is not a negative thing – Having many competing agendas and having a complex mix of needs is what cities are all about.

Dublin Chamber encourages the City Council to take a balanced approach to managing and developing the public realm and to consult and collaborate with business community, so that people can read and move around the city with ease, economic activities can continue to thrive, and the history and distinct character of the city is protected.