



**SOUTH  
GEORGIAN  
CORE**  
RESIDENTS' ASSOCIATION

## South Georgian Core Residents' Association

Pre-Draft Submission to

Dublin City Council

Development Plan 2022–2028

Submitted to DCC on behalf of the South Georgian Core Residents' Association by the Committee

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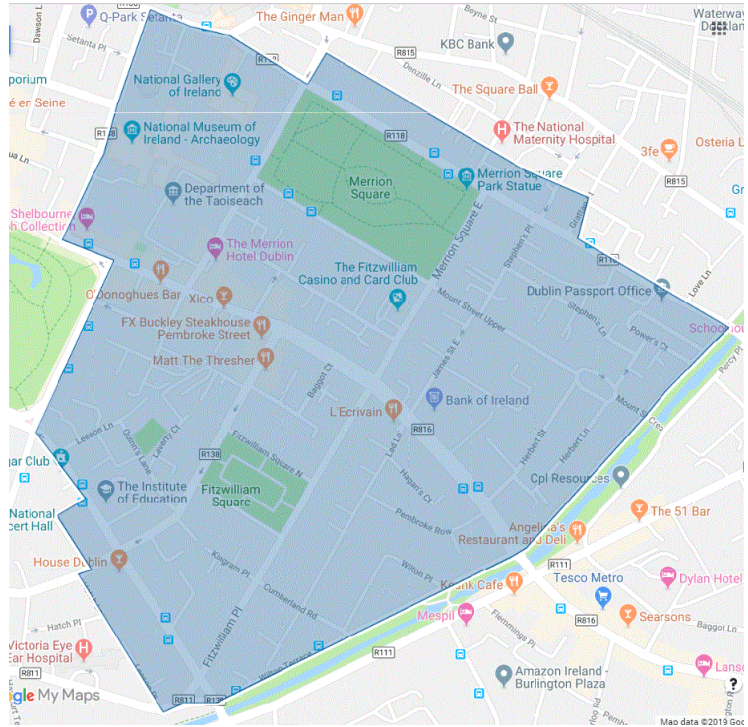
# Table of Contents

1.0: South Georgian Core Residents’ Association .....	3
2.0: Dublin is in Trouble.....	5
3.0: What is up with the South Georgian Core .....	7
4.0: Primary Policy Recommendations for Dublin City Council Development Plan 2022–2028.....	10
4.1: Policy Objective 1 – Supporting a Residential Vision for the South Georgian Core .....	10
4.2: Policy Objective 2 – Create and Expand Incentives for City Centre Living .....	12
4.3: Policy Objective 3 – Adopt a Reworded Z8 Land-Use Zoning Objective .....	13
4.4: Policy Objective 4 – Setting up a One-Stop Shop.....	14
4.5: Policy Objective 5 – Setting up a ‘Data Bank’ .....	14
4.6: Policy Objective 6 – City Centre Mews Strategy 2028.....	15
4.7: Policy Objective 7 – Office Conversion.....	17
4.8: Policy Objective 8 – Public Realm Improvements.....	18
4.9: Policy Objective 9 – Urban Greening Strategy.....	19
4.10: Policy Objective 10 – Evaluation and Reporting of Implementation of Objectives .....	20
5.0: Conclusion.....	20

# 1.0: South Georgian Core Residents' Association

The South Georgian Core Residents' Association (SGCRA) represents a diverse residential community living in the heart of Dublin's south-east city centre core. The SGCRA was established in 2017, and we draw our membership from the geographical area shown in the map. The constitution of the association sets out the following aims:

- To maintain and improve the conditions and amenities for residents in the South Georgian Core.
- To strengthen the identity of the South Georgian Core.
- To increase the sense of community and social interaction among residents in the area.
- To ensure the area is well represented when dealing with local and statutory bodies.
- To stimulate public interest in the geography, history, natural history and architecture of the area.
- To encourage the preservation, protection, development and improvement of features of historic or public interest in the area.
- To promote excellence in new developments.



The Residents' Association seeks to promote and sustain an inclusive, mixed-income, vibrant and sustainable residential vision for our city centre. This is a dynamic neighbourhood that includes a hugely diverse mix of people and homes. We want to build upon this sense of community and to welcome others to live in one of the most beautiful parts of Dublin City.

At the heart of our welcoming residential vision is a belief that the South Georgian Core, arguably Dublin's most historically significant urban heritage area, has huge untapped residential potential. This huge untapped residential potential is not simply an opportunity for us as a community, but has, we believe, national significance. It contains the 'soul' and DNA of the city owing to its early and recent history, which contain the many layers of the city and stories of the people who lived there. The South Georgian Core contains many notable Dubliners from every walk of life and profession, artists, professionals, writers, revolutionaries, shopkeepers, teachers, mathematicians, scientists and politicians. The South Georgian Core has the potential to showcase the best of what urban living can offer. While helping Dublin to regenerate its city centre and in doing so, meeting its sustainability and climate action goals, by creating a dynamic and vibrant City core complemented by well serviced and integrated neighbourhoods. It also has the potential to help Dublin meet the National Strategic Outcomes overall for Irish cities.

There are of course challenges. Dublin City is largely a suburban city, with few choosing the city centre to be their long-term home. We urgently need to transform both the perception and reality of the South Georgian

Core as a largely office-dominated area to one of the most attractive and vibrant residential neighbourhoods in Dublin, close to educational and cultural institutions and the European headquarters of international companies.

We support Dublin City Council's vision to promote a more dense, vibrant and more livable residential vision for its city centre. In the interests of environmental sustainability, land use and transport efficiency, and urban and cultural vibrancy it is more important than ever that this vision is realised. We want to play an active role in helping Dublin City Council advance this residential vision and meet its goals under its Climate Action Plan. We believe that adoption and implementation of the policy objectives outlined in this submission will help to advance that objective in the short to medium term.

We also recognise, however, that Dublin today has a number of arguably unique challenges that need to be better acknowledged and addressed if we are to succeed as a city. We seek in this submission to highlight some of these challenges and also to propose policies supporting a residential vision for the South Georgian Core which will help to address many of these challenges head on.

## 2.0: Dublin is in Trouble

Today Dublin is in some trouble. In an effort to suppress the Covid-19 virus, the economic tide has gone out for many cities around the world, but few cities have been left as nakedly exposed as Dublin, or ‘urban Dublin’ to be precise. There is a singular reason for this. Dublin has, for far too long, favoured the temporary, often fleeting, visitor over the local urban resident.

A city that prioritises suburban shoppers, daily commuters and the spending power of international tourists over sustainable, mixed-income and family-friendly living at its centre is now – in the era of Covid-19 – reaping the rewards of its anti-urban living policies.

Dublin City in recent years has also prioritised ever more hotel construction and student accommodation at the expense of building affordable, spacious apartment homes in its urban centre. That now looks like a very bad investment, which was recently acknowledged by the City Council’s Chief Planner in 2021. He stated:

*The policy thread that connects anti-social behaviour, empty streets and dying retail at its urban core is the failure to adopt and promote an ambitious residential vision for the city centre.*

*“The development plan would also consider whether there was an ‘overprovision’ of hotels and student accommodation in certain parts of the city . . . Retail, although there will be some bounce back, will never return to the position it had. But we have to retain the vitality of the city streets, and that might mean a greater focus on culture, on eating out, and on more residential use in the city centre.”<sup>1</sup>*

A significant obstacle to promoting city centre living in its many forms is anti-social behaviour. For far too long anti-social behaviour has been excused, ignored or misunderstood in Dublin. This anti-social behaviour comes in many forms from aggressive begging, to multiple house burglaries (which many of our members have been victim of), or, indeed, the holding up at knife-point (as one of our members was in recent weeks while outside Merrion Square, as she was giving a talk, on Georgian History in Dublin to an international audience via zoom).

Anti-social behaviour such as aggressive begging may have been easier to dismiss or less visible in a bustling city full of tourists and suburban shoppers and office workers, but now it looks a much greater challenge in a forlorn city centre. Just this month the Taoiseach warned that the Irish State faces

*“losing control of a whole section of Dublin if drug-related violence and intimidation in the north-inner city are not stopped.”<sup>2</sup>*

The policy thread that connects anti-social behaviour, empty streets and dying retail at its urban core is the failure to adopt and promote an ambitious residential vision for the city centre. That failure risks the future of Dublin as a competitive, wealthy, livable European capital. It is already happening. Brexit was once seen as an opportunity for Dublin.

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<sup>1</sup><https://www.irishtimes.com/news/environment/days-of-three-bed-semis-in-dublin-are-over-as-high-density-housing-plans-take-hold-1.4460746>

<sup>2</sup><https://www.irishtimes.com/news/social-affairs/taoiseach-warned-control-of-north-inner-city-dublin-on-verge-of-being-lost-1.4477389>

This is no longer the case. For example, the move of the EMA (European Medicines Agency) from London to Amsterdam exposed the perception that Dublin is attractive for high-earning, highly skilled European mobile workers.<sup>3</sup> Dublin was poorly ranked by staff as an option for relocation, with a significant proportion of its 900 staff saying they would permanently leave the organisation if ‘forced’ to move to live in Dublin, a higher proportion than Amsterdam, Barcelona, Copenhagen, Milan and Vienna, amongst others.<sup>4</sup>

The reason is stark. The centre of Dublin today is simply not attractive enough to attract high-earning EU workers who are accustomed to a safe, dense, vital urban quality of life, with a diverse choice of spacious homes to choose from in its centre. A dead and edgy Dublin city centre is almost guaranteed to undermine the long-term health of both the Dublin and Irish economies, and with that go many of those well-paid jobs of suburban-living workers.

There is a solution. That solution is a robust, targeted residential vision for Dublin’s inner urban core, specifically a vision to attract and retain a sustainable and substantial mixed-income residential community. A city core that is *not attractive* to middle-income families to live – who have some reasonable housing choice – is a city core that is unlikely to be attractive to many others.

The South Georgian Core Residents’ Association strongly argues that the starting place for this ambitious residential vision for Dublin’s urban recovery is to significantly repopulate Dublin’s South Georgian Core and its environs.

The South Georgian Core lies at the heart of the city, it already exists as an architectural (potential housing) asset, it’s quintessentially authentic Dublin. It presents multiple opportunities for residential densification that would not detract but enhance the quality of urban life in the area.

In the short to medium term at least, the South Georgian Core can act as a significant catalyst to reimagine desirable urban living in Dublin.

**A dead and edgy Dublin city centre is almost guaranteed to undermine the long-term health of both the Dublin and Irish economies, and with that go many of those well-paid jobs of suburban living workers.**

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<sup>3</sup><https://www.sciencemag.org/news/2017/11/european-medicines-agency-will-move-amsterdam>

<sup>4</sup>[https://www.ema.europa.eu/en/documents/other/annex-b1-other-criteria-essential-ensure-ema-remains-operational-guarantee-business-continuity\\_en.pdf](https://www.ema.europa.eu/en/documents/other/annex-b1-other-criteria-essential-ensure-ema-remains-operational-guarantee-business-continuity_en.pdf)

### 3.0: What's up with the South Georgian Core?

The South Georgian Dublin squares and their immediate adjoining streets are arguably Dublin's greatest architectural and urban design set pieces. Few Dubliners would disagree that this is quintessentially the most beautiful part of their city, yet this is also an oddly underperforming urban asset. It is one of the most centrally located and beautiful parts of urban Dublin, yet in many streets and squares most properties are not in residential use.

In other European capital cities, streets like Mount Street Upper (vista terminated by the Pepper Canister Church) would be the most desirable and sought-after street to live in.

However, as residents of the area, we believe that the development of the South Georgian Core has been developer-led rather than city-led. This has resulted in the overdevelopment of offices at the expense of residential living.

This huge pressure for office development in the South Georgian Core in recent years has had a significant negative impact on the area. There are many examples of this, including:

- the demolition of the 1960s office block at the junction of Wilton Terrace and Baggot Street Lower and its replacement by a bigger monolithic office block;
- on Pembroke Row, demolition of a 1980s office block, Kildress House and its replacement with a much larger building;
- 1 and 2 Pembroke Row, part restaurant and part residential has been replaced by a higher glazed office block;
- the development of the LinkedIn office building at Wilton Place on the old OPW site;
- the IPUT redevelopment of the office blocks between Wilton Place and Lad Lane;
- The replacement of the Fitzwilton building near Leeson Street Bridge;
- Herbert Place - Large office block proposed (with 2 apartments) in Z8 zoned area;
- Warrington Place office block, which involved the demolition of existing 1970s building.

These buildings have excess plot ratios and site coverage and have maximised their heights, without regard to the surrounding conservation area. These developments have significantly impacted residential amenity and downgraded the area's integrity, character and distinctiveness and none have provided any element of residential development.

In addition to the above, there have been recent applications to demolish old but non-listed buildings on Pembroke Road Lower and Merrion Row, as well as applications for short-term lets on Herbert Street and Pembroke Row and applications for oversized multi-unit dwellings on small mews lanes sites such as Kingram Place and Lad Lane.

**The residents believe that the development of the South Georgian Core has been developer-led rather than city-led. This has resulted in the overdevelopment of offices at the expense of residential living.**

All these applications are developer-led and appear to be evaluated on an isolated basis without considering the cumulative impact of this developer-led office development on the sustainable development of a residential vision for the South Georgian Core.

In the context of developer-led office development in the South Georgian Core, how can Dublin attract people back into the heart of the South Georgian Core city to live, to sustain local business, to generate vitality on the

streets in the evening, but, most importantly, to promote the status of urban living that is essential for the future sustainability of Dublin?

We believe that, until the inner city offers a meaningful supply of spacious, well-designed, affordable high-density homes along with the refurbishment of existing housing stock, an extensive quality everyday Dublin urbanism is unlikely to emerge.

Anecdotal evidence suggests that Georgian Townhouses have become increasingly unattractive for the office market as businesses move to more convenient purpose-built office blocks or to the Docklands.

While, as outlined above, there has been substantial redevelopment of office blocks in the area in recent years, the area hasn't witnessed a comparable boom in housing construction. The number of people living in the area has remained largely static in the last decade or so.

This has resulted in a huge imbalance of investment between office and residential development. This is bad for the area and bad for the city. It is the result of bad planning or the lack of an overall plan or vision for the area. The area urgently requires more integrated and joined-up planning to deliver a vibrant and balanced community.

The South Georgian Core Residents' Association strongly believes that Dublin City Council needs to set out a strategic vision for the long-term sustainable future of the South Georgian Core, and that this vision should be to repopulate the area as a desirable place to live. The merits of that vision are many, overlapping and reinforcing.

Dublin's South Georgian Core should not be simply viewed – as it often is – as a wonderful architectural asset, a majestic historic set piece of squares and Protected Structures, but instead as a livable breathing community with enormous residential potential. That potential is not restricted to the area alone. Attracting people back into the heart of the city would assist in consolidating an often fragile residential living elsewhere in the city centre and inner city.

This vision of greater residential use for the area is not confined to the Georgian Townhouses and needs to address very broad concerns around quality urban living, including the importance of clean, safe streets, great local parks, well-designed homes and a high-quality public realm. No matter where we live, no matter the size or type of home, all of us want to live in a neighbourhood that is clean, safe and green, a neighbourhood that is welcoming and beautiful.

The potential conversion of Georgian Townhouses does provide, however, a unique opportunity.

Residential consolidation has the potential to unify wider Dublin civic society around a shared vision for a collective Dublin regeneration project, to enthuse Dubliner 'ownership' of the city's Georgian heritage. A residential vision should not favour or preclude specific models of residential ownership, but instead be driven by the primary desire to provide demonstration models for quality urban living.



The appropriate conversion of many of the Townhouses to residential use can provide a model for other Georgian buildings across the city, providing an economic rationale for investment to consolidate and reuse vulnerable historic fabric in places like Thomas Street and the north inner city.

There are of course significant cost barriers, investment fears, bureaucratic barriers and regulatory impediments to making Georgian Townhouses attractive places to live. The adoption of all the policy objectives below will address those problems to a significant extent.

This submission puts livable urbanism at the core of its vision. This is an inclusive vision for all that emphasises the importance of well-designed, spacious homes, a quality public realm, clean, green and safe streets and a vibrant city core. We urge Dublin City Council to adopt all the following recommendations.

This vision of greater residential use for the area is not confined to the Georgian Townhouses and needs to address very broad concerns around quality urban living, including the importance of clean, safe streets, great local parks, well-designed homes and a high-quality public realm. No matter where we live, no matter the size or type of home, all of us want to live in a neighbourhood that is clean, safe and green, a neighbourhood that is welcoming and beautiful.

## 4.0: Primary Policy Recommendations for Dublin City Council Development Plan 2022–2028

The South Georgian Core Residents' Association urges the City Council to adopt the recommendations of the South Georgian Core Study (2013). Most of these are set out below and grouped under various headings. These detailed policy recommendations will support a core residential vision for the South Georgian Core.

This core vision will be anchored around ten primary residential policy objectives. All ten are central to supporting a long-term, sustainable residential vision for the South Georgian Core and wider city centre. We urge the City Council to adopt these ten core policy objectives.

### 4.1: Policy Objective 1 – Supporting a Residential Vision for the South Georgian Core

*“In order to further advance a residential vision for the South Georgian Core, it is the Policy Objective of Dublin City Council to facilitate the refurbishment and where appropriate sub-division of Georgian Townhouses, befitting of modern 21st century residential needs. Specifically, this includes the adoption of the recommendations of the ‘South Georgian Dublin Townhouse Re-Use Guidance Study’.”<sup>5</sup>*

We urge Dublin City Council to have a high-profile public launch of the ‘South Georgian Dublin Townhouse Re-Use Guidance Study’ (carried out by Shaffrey Associates Architects) and to engage in a long-term positive communication strategy to promote its broader residential vision.

This study gave detailed consideration to conservation best practice, planning policy, architectural design and critically universal access challenges of converting full Georgian houses into high-quality residential homes (including complementary commercial overnight accommodation).

This report provides practical, conservation-driven guidelines for the refurbishment of Protected Structures and it needs to be adopted and actively promoted by DCC, with an ongoing communication strategy. This is not simply the restoration of a residential vision but a much broader strategy to support and promote a distinct, diverse but complementary suite of ‘Georgian living experiences’.

The four typologies of commercial and residential refurbishment/development promoted in this document have the potential to unify business interests, conservation experts, civic society and cultural/tourism promoters around a shared, convincing and sustainable urban vision for the South Georgian Core. Just as a heritage vision should excite business interests, an economic vision should excite conservation enthusiasts.

As part of this overall vision and to ensure its successful implementation we strongly urge Dublin City Council to:

1. adopt a flexible approach to proposals for internal alterations to Protected Structures to ensure that these properties meet the needs and expectations of a 21st-century comfortable home. Specifically,

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<sup>5</sup><https://www.dublincity.ie/sites/default/files/2020-11/south-georgian-dublin-townhouse-re-use-guidance-document.pdf>

the installation of new bathrooms, en suites, modern kitchens, central heating, insulation and ancillary services (such as laundry chutes) should be permissible and better facilitated. And that this recognition be better reflected in both planning policy and practice.

2. present demonstration models (robustly tested against City Council policy) of residential sub-division to the public. These should model excellence in terms of design (the apartments themselves) and in terms of communication (effective visuals and public relations strategy). Real-life projects should be identified and supported. There is an opportunity here to work with the ESB to showcase their conversion of the houses in Mount Street to modern city centre apartments.<sup>6</sup>
3. adopt the recommendations of the South Georgian Core Study (2013) with regard to better coordination between City Council departments. This study was approved by the Steering and Working Committee, which included the then Dublin City Architect and Deputy City Planner.

*Inconsistency in planning decision-making and delays in the planning process are accepted as adding significant costs for applicants. Such delays and inconsistency also act as a major disincentive to investment and appropriate refurbishment of historic fabric.*

Regarding international practice and lessons for Dublin City going forward, we note the South Georgian Core 2013 document's reference to the city of Edinburgh:

*“Edinburgh has nine specialist planners/conservation officers dealing holistically with ‘Planning’, ‘Conservation’ and ‘Disability Access Certificates’ at the same time. This lessens the potential for ‘disagreement of interpretation’ between various disciplines. ‘Areas of disagreement’ between the nine Conservation/Planning Officers tend to be ‘ironed out’ so to speak at a weekly team meeting, chaired by a single Director of services responsible for the team. The absence of a ‘singular’ voice on Conservation is in sharp contrast to Dublin.”*

With regard to the above, we wish to stress to Dublin City Council the need to ensure planning consistency and optimal coordination between all departments – specifically planning, conservation, universal access and fire certification – to minimise unnecessary delays and further information requests in planning applications, all of which can generate significant unnecessary costs for applicants. This uncertainty is a significant deterrent for potential owners of houses in the South Georgian Core. Owners need certainty in advance of investing and this certainty is not available with the current costly and inconsistent planning outcomes. This needs to be addressed as a matter of priority by DCC.

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<sup>6</sup><https://www.irishtimes.com/culture/esb-seeking-to-convert-georgian-house-museum-into-apartments-1.4470013>

## 4.2: Policy Objective 2 – Create and Expand Incentives for City Centre Living

*“It is the Policy Objective of Dublin City Council to promote and advance an extension of the ‘Living City Initiative’ (Tax Incentive Scheme for residential purposes) to the South Georgian Core area of the city or to establish other tax based incentives to assist and encourage residents to make this part of the city centre their home.”<sup>7</sup>*

We ask that the South Georgian Core be included in the Living City Initiative. An earlier draft version of this proposal submitted to the Department of Finance included the South Georgian Core area. We simply ask that to be reinstated in the light of the unique challenges facing Dublin arising from Covid-19.

Alternatively we propose that Dublin City Council make a specific proposal to the Department of Finance that all works to a Protected Structure in residential use be exempt from VAT charges. This will encourage both the appropriate renovation and upkeep of existing residential homes but also incentivise others to invest or choose to live in Protected Structures. This would in some way compensate owners of protected structures for the additional costs associated with the ownership of these buildings.

By way of reference with the larger context of urban regeneration here and abroad, cities such as Birmingham, Leeds, Manchester and Croydon in the UK have successfully used economic initiatives for individuals and businesses to encourage them to return to the city centre. Cities overseas such as Dallas have used tax incentives and public private partnership projects to regenerate the city centre and, by doing so, creating new arts centres, schools and libraries to make the centre attractive to working families. Pittsburgh has also successfully regenerated its city centre by focussing on housing, schools, libraries and cultural amenities for residents while attracting a mixture of usage for land in the city centre. By focussing on affordable housing and vicinity to amenities, companies like Google have no trouble attracting top talent from Silicon Valley, especially younger families because, as Kamal Nigam, the head of Pittsburgh’s Google office says, “Pittsburgh is basically the best small city in the country. You’ve got the cultural institutions of a much larger city and great neighbourhoods where you can walk to work or to the movies or a bookstore.” Detroit has also regenerated its city centre by focussing on amenities such as schools, transport and creating thriving arts centres and the rehabilitation of office space into residential space. There is no reason why the South Georgian Core of Dublin could not offer the same environment and be competitive.

The city of Masan, South Korea, allowed artists to live rent-free in the city centre and this in turn attracted businesses (who were given preferential lease terms), which then attracted further investment and businesses. Christchurch in New Zealand attracted a young innovative and creative community by requesting submissions for use of vacant floors in and entire vacant buildings. This has resulted in encouraging young people to move to the city centre and regenerate the local financial and cultural economy. There are further examples from Oslo, Copenhagen, Rotterdam, Berlin, Warsaw and many other European cities with substantiated data and research that can be used in Dublin without having to ‘reinvent the wheel’.

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<sup>7</sup>[https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-05/19618\\_DCCo\\_Living\\_City\\_Grant\\_InitiativeV10\\_2\\_.pdf](https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-05/19618_DCCo_Living_City_Grant_InitiativeV10_2_.pdf)

### 4.3: Policy Objective 3 – Adopt a Reworded Z8 Land-Use Zoning Objective

The existing wording:

*Land-Use Zoning Objective Z8:*

*“To protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective.*

*“Lands zoned Z8 incorporate the main conservation areas in the city, primarily the Georgian Squares and streets. The aim is to protect the architectural character/design and overall setting of such areas. A range of uses is permitted in such zones, as the aim is to maintain and enhance these areas as active residential streets and squares during the day and at night-time. Offices may be permitted where they do not impact negatively on the architectural character and setting of the area and do not result in an over-concentration of offices. In the south Georgian core where residential levels are low, it is the aim to encourage more residential use in the area.”*

This shall be replaced by a new wording (below) to make explicit the residential vision of Dublin City Council. The existing wording is facilitatory and supportive of a residential vision, but has critically failed to deliver that residential vision.

The proposed new wording:

*Land-Use Zoning Objective Z8:*

*“To protect the existing architectural and civic design character, and to promote residential use consistent with the conservation objective.*

*“Lands zoned Z8 incorporate the main conservation areas in the city, primarily the Georgian Squares and streets. The aim is to protect the architectural character/design and overall setting of such areas. A range of uses is permitted in such zones, as the aim is to maintain and enhance these areas as active residential streets and squares during the day and at night-time, so future office expansion will not be permitted where it is evident that there is an over-concentration of office use. An over-concentration of office use arises when in excess of 50% of Townhouses on a said street are in office use. In the South Georgian Core, where residential levels are low, it is the aim to encourage more residential use in the area, to include support for sub-division and universal access that do not impact negatively on the architectural character and setting of the area.”*

To facilitate the implementation of this policy objective, Dublin City Council should:

- examine site-specific solutions and incentivise the removal of surface car parks to the rear of properties Zoned Z8. This is included and expanded upon as an additional objective below.
- have a consistent and unified approach to land-use zoning be applied to the mews lanes (adjoining lands zoned Z8 in the area). The **current** zoning appears arbitrary.

Additionally, to promote and consolidate the South Georgian Core as an attractive choice for residential living, DCC must not sanction development in the Z4 planning zones, such as Merrion Row or Z5 Planning Zones such as Baggot Street Lower which would negatively impact on the quiet enjoyment of residents of their homes.

#### 4.4: Policy Objective 4 – Setting up a One-Stop Shop

*“It is the Policy Objective of Dublin City Council to set up a City Centre Georgian Core ‘One-stop-shop’ Office to co-ordinate, prioritise, communicate and strategise the implementation of a residential vision for Dublin’s Georgian Core.”*

The purpose of this one-stop-shop is to better assist or inform existing and prospective owners on guidance on sustainable residential investment in Protected Structures. This should be appropriately staffed with a team of relevant expertise.

The City Council needs to take a proactive role here in communicating that it is ‘open for business’. Clear parameters need to be set out as to its operation and remit.

Consideration should be given to the establishment of a ‘South Georgian Quarter’ interdisciplinary development team to give identity to the ‘area’ to coordinate and monitor policy. This would give momentum and assist in communicating the revaluing of the area.

Dublin City Council should also consider setting up an informal forum inviting property residents and owners of Protected Structures in the South Georgian Core to meet to discuss relevant issues. This forum should happen in the South Georgian Core. This forum should also host ‘info’ sessions and guidance on restoration and refurbishment of Georgian Protected Structures.

#### 4.5: Policy Objective 5 – Setting up a ‘Data Bank’

*“It is the Policy objective of Dublin City Council to set up and fund a publicly accessible ‘Data Bank’ of the South Georgian Core area to facilitate, monitor and evaluate the implementation of its residential vision.”*

All City Council Policies and Objectives should be thoroughly evaluated and interrogated at the end of every Development Plan to assess their success of implementation or otherwise. There is a paucity of *hard* data underpinning most City Council Planning Objectives. Development Management Policy (Planning Control/Planning Applications) is often data driven, via site coverage/plot ratio/height quantitative standards, but most of the Development Plan’s ‘Vision Statements’ are devoid of any meaningful mechanism of evaluation. Policy-making needs more data.

This ‘Data Bank’ should include data on the following (many others can be included going forward). Some of those listed below are further developed and expanded in the detailed policy objectives.

- Number of Georgian homes in residential use
- Number of homes in the area
- Total population of the South Georgian Core
- Number of live enforcement cases (including resolutions)
- Office vacancy/occupancy rate in prime Georgian squares and streets
- Audit of vacant land and vacant premises across the city centre, including the SGC
- Clear residential targets for the South Georgian Core

- Protected Structures survey, the purpose of which is to produce a comprehensive inventory of the Protected Structures to determine: houses at risk; vacancy; hierarchy of architectural merit/protection; and internal features, including condition thereof etc.

#### 4.6: Policy Objective 6 – City Centre Mews Strategy 2028

*“To promote city living and urban sustainability, it is a Policy Objective of Dublin City Council to develop and implement a specific Mews Strategy for all lands within the Canal Ring”*

The mews of the South Georgian Core can offer opportunities to increase the residential population of the area. Historically, the mews lanes have experienced quite different levels of development which has not always enhanced either their character, residential amenity or the mews-main house amenity and settings. To encourage further mews development within appropriate limits, we wish to see the standards for mews dwellings in the existing Dublin City Development Plan, (Section 16.10.16 Mews Dwellings) maintained.

The height of mews buildings should be informed by established height of existing mews roof ridgelines in a laneway. The scale between the existing property and any new mews should respect the existing mews building profiles and lines and maintain the minimum distance of 22m between the mews and main houses. If new developments are allowed to disregard the general dimensions of existing mews buildings, this would negatively impact the unified character of the mews lanes, compromise the amenity of the adjoining mews buildings as well as the setting and amenity of the main house and its potential to be subdivided for residential use.

There is a big variety on mews lanes – and it is not possible to prescribe a one-size-fits all approach to their development. They are subject to different zoning designations - Z8 and Z1 primarily. Many original mews buildings are substantially intact. On some mews lanes, there are runs of original mews houses. On other lanes, a good number of the original mews buildings have been adapted by adding another floor, often with a mansard roof and/or partially extending into the front yard space. Some mews houses have long since been demolished and a variety of new buildings have taken their place. Some of the original mews, the ‘new’ buildings or empty sites are considered ripe for redevelopment and it is crucial that they are developed in a way which is consistent with what is already there - in terms of height, bulk and the use of appropriate materials.

We recommend that detailed architectural and design guidelines (similar to those for the main houses) should be published to both inform and assist better decision making. All future planning applications should be informed by these guidelines. We stress that generic apartment style developments or flat-roofed profiles are not an appropriate model for mews development. Having regard to the above it is recommended all Mews applications for the city (for a minimum of three years) should be assessed by a suitably qualified individual to ensure consistency and quality in decision making across the city.

The ‘Mews Policy’ should be primarily informed by enhancing the character of the area. With significant modern office development in the vicinity, the mews comprise the part of the buffer zone between these and the historic areas. Mews lanes, with careful development, can be improved in terms of residential amenity and visual attractiveness, becoming a catalyst for increased numbers of residents in both the mews and main houses.

The South Georgian Core Residents Association support the retention of existing Mews Dwellings policies, with proposed amendments to c & g.

a) Dublin City Council will actively encourage schemes which provide a unified approach to the development of residential mews lanes and where consensus between all property owners has been agreed. This unified approach framework is the preferred alternative to individual development proposals.

b) Stone/brick coach houses on mews laneways are of national importance. Dublin City Council recognises the increasing rarity of stone/brick coach houses and the need to retain and conserve all of the surviving examples, particularly in relation to their form, profile and building line as well as any original features remaining. Proposals to demolish such buildings will generally not be accepted.

c) Development will generally be confined to two-storey buildings. In certain circumstances, three-storey mews developments incorporating apartments will be acceptable, where the proposed mews building is subordinate in height and scale to the main building, where there is sufficient depth between the main building and the proposed mews building to ensure privacy, where an acceptable level of open space is provided and where the laneway is suitable for the resulting traffic conditions and where the apartment units are of sufficient size to provide for a high quality residential environment. This is in line with national policy to promote increased residential densities in proximity to the city centre.

## Proposed Policy

*c) Development will generally be confined to two-storey buildings. In certain circumstances, three-storey mews developments incorporating apartments will be acceptable, where the proposed mews building:*

- is subordinate in height and scale to the main building;*
- is maintaining the established height of existing mews roof ridgelines;*
- has sufficient depth between the main building and the proposed mews building to ensure privacy;*
- has an acceptable level of open space is provided and where the laneway is suitable for the resulting traffic conditions*
- has apartment units are of sufficient size to provide for a high quality residential environment.*

*This is in line with national policy to promote increased residential densities in proximity to the city centre.*

d) Mews buildings may be permitted in the form of terraces, but flat blocks are not generally considered suitable in mews laneway locations.

e) New buildings should complement the character of both the mews lane and main building with regard to scale, massing, height, building depth, roof treatment and materials. The design of such proposals should represent an innovative architectural response to the site and should be informed by established building lines and plot width. Depending on the context of the location, mews buildings may be required to incorporate gable-ended pitched roofs.

f) The amalgamation or subdivision of plots on mews lanes will generally not be encouraged. The provision of rear access to the main frontage premises shall be sought where possible.



g) All parking provision in mews lanes will be in off-street garages, forecourts or courtyards. One off-street car space should be provided for each mews building, subject to conservation and access criteria.

#### Proposed Policy

*g) All parking provision in mews lanes, where provided, will be in off-street garages, forecourts or courtyards, subject to conservation and access criteria.*

h) New mews development should not inhibit vehicular access to car parking space at the rear for the benefit of the main frontage premises, where this space exists at present. This provision will not apply where the objective to eliminate existing unauthorised and excessive off-street car parking is being sought.

i) Potential mews laneways must have a minimum carriageway of 4.8 m in width (5.5 m where no verges or footpaths are provided). All mews lanes will be considered to be shared surfaces, and footpaths need not necessarily be provided.

j) Private open space shall be provided to the rear of the mews building and shall be landscaped so as to provide for a quality residential environment. The depth of this open space for the full width of the site will not generally be less than 7.5 m unless it is demonstrably impractical to achieve and shall not be obstructed by off-street parking. Where the 7.5 m standard is provided, the 10 sq.m of private open space per bedspace standard may be relaxed.

k) If the main house is in multiple occupancy, the amount of private open space remaining after the subdivision of the garden for a mews development shall meet both the private open space requirements for multiple dwellings and for mews development.

l) The distance between the opposing windows of mews dwellings and of the main houses shall be generally a minimum of 22 m. This requirement may be relaxed due to site constraints. In such cases, innovative and high quality design will be required to ensure privacy and to provide an adequate setting, including amenity space, for both the main building and the mews dwelling.

#### 4.7: Policy Objective 7 – Office Conversion

*“In the interest of sustainability, it is the Policy Objective of Dublin City Council to facilitate the conversion of ‘tired/third generation offices’ to residential use in the city core having regard to the following core design guideline principles.”*

There are many ‘tired and third generation’ office blocks in the inner core that (post-Covid-19) have an increasingly uncertain economic future. In the interest of environmental sustainability many of these properties should not be demolished but instead converted to residential use. Many have underground car parks. Most have tall ceilings and potentially wonderful vistas. Their conversion to residential use should be a holistic approach befitting their unique opportunity and constraints. There is potential for a ‘New’ urban residential living model. Consideration should be given to adopting the following:

- Car parking standards should be relaxed (where appropriate abolished).
- Private open space and communal open-space standards should be relaxed.

- Internal communal storage facilities, including a ground-floor concierge space and meeting rooms shall be provided.
- No on-street ground-floor residential units shall be permitted.
- The mix of apartments should not be defined by bedroom numbers but by area. In this regard the mix should aspire to the following:
  - 80–100 sqm – 50%
  - 100–120 sqm – 25%
  - Greater than 120 sqm – 25%
- A Dublin City Council Design Guideline Document should be prepared and adopted to incorporate the above (including all other design/building/planning opportunities/constraints).
- This should be statutorily ‘ring fenced’ from Section 28 Ministerial Guidelines to allow City Council control. ‘Pilot Project’ status exemption, etc.

Note under the 2020 Planning Act, Section 28:

*“(1) The Minister may, at any time, issue guidelines to planning authorities regarding any of their functions under this Act and planning authorities shall have regard to those guidelines in the performance of their functions.”*

#### 4.8: Policy Objective 8 – Public Realm Improvements

*“It is a Policy Objective of Dublin City Council to carry out a public realm improvement strategy for the South Georgian Core Area, with specific focus, where appropriate, on widening public pavements, improving waste management, tree planting, unauthorized signage, etc. This strategy should prioritise the immediate removal of unsightly poles, bollards and graffiti.”*

All of these sub-objectives shall have publicly available measurable targets to include the following:

- A clear objective that graffiti would be removed from all public domain property within 7 days of being reported.
- All redundant poles would be removed on a twice-yearly basis.
- Visibly abandoned bicycles would be removed on a quarterly basis.
- A clear, time-limited commitment to review existing waste management policy with input from the Residents’ Association.
- A Street Tree Greening programme with clear and quantifiable targets.
- A commitment to upgrade road surfaces, including mews lanes, with clear and quantifiable targets.

The South Georgian Core area is one of the premier tourist areas of the state. In the interest of the economy of Dublin it is imperative that the very highest standards of quality public realm be maintained in the area.

We specifically call for Dublin City Council to:

- reject the ‘BusConnects’ plans from the National Transport Authority for the felling of trees in the area, specifically those along Baggot Street Lower.
- seek a joint understanding and commitment to remove Dublin Bus parking along the south side of Merrion Square. The removal of existing bus termini should be implemented as part of an ongoing

and wider South Georgian Core strategy that must include finding suitable alternatives in the immediate area to facilitate both customer needs and the network strategy of Dublin Bus.

- carry out a public realm universal access, movement and safety audit in the south city centre with a specific focus on the elderly, toddlers and the mobile-impaired. The study will specifically examine pavement widths and pedestrian signal timing and will include an analysis of pedestrian movement and safety in the late evenings. It is generally acknowledged that part of the disincentive for families choosing to live in the city core includes concerns around child mobility and safety, particularly in the evenings.
- implement the 'standardised' requirement for external signage, including name plates, on all Georgian buildings (Zoned Z8). A compliance goal of 90% should be achieved within the lifecycle of the Development Plan.

#### 4.9: Policy Objective 9 – Urban Greening Strategy

*“It is a Policy Objective of Dublin City Council to adopt an Urban Greening Strategy for all lands inside the Canal Rings. This Urban Green strategy will include quantifiable targets for both additional green spaces and tree planting for each neighbourhood across the inner city and city centre.”*

Dublin City Council as a priority should adopt an Urban Greening Strategy modelled on that of the City of London.<sup>8</sup>

The city centre and inner city of Dublin are clearly disadvantaged when it comes to public open space. Dublin as a city (the Dublin City Council functional area) is fortunate to have a significant amount green open space. This amounts to 25% of all zoned land (Z9 zoning) in the City Council area. With a density of population of 4,800 persons per square kilometre, the city's residents enjoy some 45 sqm of open space per person.

Within Dublin's Canal Ring the density of population is more than 9,000 people per square kilometre. Inside the Canal Ring there is just 77 hectares of designated zoned (Z9) open space, which generates less than 6.5 sqm per person. That's seven times less than the city as whole.<sup>9</sup>

Dublin City Council should also make public the research data carried out with UCD School of Geography on street trees across the city.

Dublin City Council should examine site-specific solutions and incentivise the removal of surface car parks to the rear of properties Zoned Z8. The economic value of such car parks (and thus the value in sustaining the offices) can be substantial. Rear gardens accommodating up to 20 car parking spaces are not uncommon.

Finally, Dublin City Council should provide an annual update to City Council elected members clearly setting out the progress on each of the above urban greening objectives (to include quantifiable data).

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<sup>8</sup><https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/urban-greening#acc-i-53467>

<sup>9</sup>Source: *Beyond Pebbledash the Puzzle of Dublin 2014*, updated.

#### 4.10: Policy Objective 10 – Evaluation and Reporting of Implementation of Objectives

*“It is a Policy Objective of Dublin City Council to ensure that the implementation of all Policy Objectives of the Dublin City Development Plan 2022-2028 are monitored during the lifetime of the Plan (with annual reviews where practicable) and that each Policy Objective should have clearly stated where practicable quantifiable targets.”*

We strongly recommend that Dublin City Council ensure that a publicly transparent reporting mechanism be established to review the success or otherwise of the implementation of all City Development Plan Policy Objectives, and that this reporting mechanism have a clearly stated and agreed shared understanding of success. In addition, and where practicable, all Policy Objectives should have quantifiable targets to include clearly stated timeframes.

## 5.0: Conclusion

The South Georgian Core Residents’ Association welcomes this opportunity to make a submission to the Dublin City Development Plan 2022–2028.

We respectfully urge Dublin City Council to fully adopt all of the above recommendations to assist Dublin in advancing a dynamic, livable and inclusive residential vision for its city centre and inner-city core area. We remain available to engage with DCC on the matters outlined and can be contacted at any time by email at [sgcreidentsassociation@gmail.com](mailto:sgcreidentsassociation@gmail.com).