

SUBMISSION ON THE DRAFT DUBLIN CITY DEVELOPMENT PLAN 2022 -2028

N.B. Please redact my signatures on the submission before publishing.

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Final date for submission 1st September 2022.

**Submitted by:
Eamonn Smyth,**

30th August 2022.



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I Eamonn Smyth of [REDACTED], wish to make an observation on the Draft Dublin City Development Plan 2022 -2028 ('The Draft Plan'). My submission relates to Chapter 11, (Built Heritage and Archaeology) of The Draft Plan with specific reference to Section: 11.5.2. ,(Priority Architectural Conservation Areas) ('ACAs')

As a life long resident of [REDACTED] I wish to state my opposition to the proposal (Motion 55) that Blessington Street/Eccles Street/Nelson Street in Dublin 7 ('the Area'), be prioritised as ACAs in The Draft Plan, as the designation of such will present additional challenges to both "citizens" who live in the area, and investors who are necessary for the maintenance of "*a vibrant city where people live and work*". Therefore, I would urge that this motion should not be adopted by the City Council.

RATIONALE

Chapter 11.3 of the Draft Plan (p 392) refers to the "*Challenges*" and "*...key issues facing the city in terms of its built heritage and archaeology*"

"It is recognised that various historic buildings in the city remain underutilised and vacant. Identifying suitable and viable uses for certain heritage buildings, particularly the upper floors, can be difficult"

The recognition that these difficulties pre-existed the current and forecasted economic downturn facing this country, is significant in and of itself. However, in circumstances where it is universally accepted that the deepening crisis of under-supply of residential accommodation is becoming an emergency, I would contend that any action which discourages investment, or acts as disincentive to the provision of residential accommodation, adds to the challenges and, therefore, should be avoided at this time.

The buildings in the Area are predominately from the Georgian period and many of these buildings have been developed into multi-occupancy residential use. However, as stated above, there is both an ongoing underutilisation and vacancy of the remaining building stock, and I would argue that financial viability will play a major role in the likelihood, and pace, of future development of this stock.

It is accepted that the protected status afforded by inclusion in an ACA only applies to the exterior of structures, and features, of the streetscape. However laudable this objective may be, it presents added challenges at a time of crisis in the provision of residential accommodation. One of these added challenges lies in the obligation that all personnel employed to carry out works must be “...*professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within Architectural Conservation Areas*” (Section: 11.5.2, p 403). This obligation will add significantly to the cost of carrying out the works necessary for the provision of residential accommodation, thus impacting the financial viability of projects relating thereto, and acting as a disincentive to the provision of such badly-needed accommodation.

It should also be noted that, in any case, planning permission is already required where any significant works need to be carried out on these buildings, and that any concerns regarding conservation, or otherwise, may be addressed during the normal extant planning process.

The Draft Plan also states that “*An over-arching issue is the on-going need to balance the often competing demands of a modern city in terms of consolidation and future growth with the need to protect its intrinsic character*”

I would argue that the “*intrinsic character*” of an area is maintained, in no small measure by its residents, particularly those who have resided in the area for generations. The imposition of an ACA on the Area will adversely impact the very residents who embody this “*intrinsic character*” as they will be financially penalised when they need to carry out necessary repairs to their homes which may lead to either not carrying out the repairs, thus allowing further deterioration of the building, or, more traumatically for the individual, being forced to move out of the Area completely.

The Draft Plan further acknowledges that the “*greenest building*” is one that is already built, “*and the continued, albeit appropriate use of an existing building is necessary for its survival*”

The Draft Plan further advises that “*There is a need to ensure that Dublin City is a real and vibrant city where people live and work, not merely a tourist destination. Dublin’s citizens will be encouraged to live in the historic core and the challenge will be to provide sensitive and environmentally sustainable restoration of historic properties, suitable for modern living*”.

As a proud “*citizen*” of Dublin I have lived in Nelson Street all of my life, and for over half a century I have witnessed the general behaviour of both local residents and people passing through this area. However, recently there has been a sharp increase in the number of homeless people sleeping rough in local bus shelters (for example the bus shelter on Eccles Street) and doorways, including the entrances of private homes.

This is a tragedy, not alone for the individuals involved, but also for the local community who have to deal with this growing problem. This situation is rapidly getting worse and flies in the face of the “... *need to ensure that Dublin City is a real and vibrant city where people live and work ...*”

One of the solutions to this homelessness emergency is the provision of additional residential accommodation and therefore in the interest of local residents, investors, and the homeless I would urge the City Council to oppose the imposition of an ACA on Blessington Street/Eccles Street/Nelson Street for the reasons set out herein.

I further call on the City Council to oppose the motion that “*The consideration of these streets as ACAs should be prioritised in the Development Plan*”

Yours sincerely
Eamonn Smyth.



Planning reason

Many new developments built and proposed in the Inner City (canal ring) are mixed developments, containing a residential element. These mixed developments should not be excluded from requiring children's playing facilities.

Motion 55

Title: Chapter 11 Section: 11.5.2 Architectural Conservation Areas, subheading Priority Architectural Conservation Areas Page: 401 - add bullet

To amend the following:

☐ {*Blessington Street/Eccles Street/Nelson Street*}

Planning reason

Blessington Street, Eccles Street and Nelson Street are historical streets of significant conservation value. These streets share similar Georgian Core architecture as North Great Georges Street and Henrietta Streets, both of which are ACAs. The consideration of these streets as ACAs should be prioritised in the Development Plan.

Motion 56

Title: Chapter 11 Section: 12.5.2 Cultural Hubs and Quarters Page: 439

To add new objective, subsequent numbering to be amended accordingly:

{*CUO7 Community Funding for Cultural Events*}

To establish dedicated funding for cultural events hosted by community groups and residents associations.}

Planning reason