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Neasa Hourigan TD  
Leinster House  
Kildare Street  
Dublin 2

Strategic Housing Unit  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

19th January 2021

Re: Case No. 308827: Lands at Castleforbes Business Park, Sheriff Street  
Upper and East Road, Dublin 1. ([www.castleforbesshd.ie](http://www.castleforbesshd.ie))

Dear Sir/Madam,

We wish to comment on the above planning application on behalf of Neasa Hourigan TD and Cllr. Janet Horner.

It is our desire to see the site developed in a manner appropriate to the location. The city continues to need more suitable accommodation. There are however a number of issues we have with the current application that we feel make it an unsuitable application.

We include below our observations on this planning application, and have submitted the required fee.

## **1. Build-to-Rent**

The Dublin City Development Plan 2016–2022 lists the land in question as Zone Z14: Strategic Development and Regeneration Areas. The same development plan contains Guiding Principles for Development of such Strategic Development and Regeneration Areas.

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Specifically for the Docklands Area<sup>1</sup> the following guiding principle is included (emphasis ours)

*To provide for residential choice with schemes conducive to family living, long-term rental and home-ownership*

As this development is designed as completely build-to-rent it makes no allowance for home ownership.

We feel that an application that has a mix of rental and ownership would be more in keeping with the guidelines.

## 2. Unit mix

The unit mix per the application is

1. 72% one bed units (14% studios and 58% one bed)
2. 2% three bedroom units

We do not believe that this is an appropriate mix for a number of reasons:

Firstly, Dublin City Council Development Plan calls for:

- a maximum of 25-30% one-bedroom units. We recognise that there is a need for more one-bedroom units and possibly a case for exceeding that 30% limit. However at 72% one-bedroom units the application is nearly three times the lower end of the spectrum. While some leeway may be appropriate based on identified circumstances a mix of this ratio would represent a setting aside of the City Development Plan.
- a minimum of 15% three-or more bedroom units. This application has 2% 3-bedroom units.

Secondly we would point again to the Guiding Principles for Development of Strategic Development and Regeneration Areas<sup>2</sup>

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<sup>1</sup>

<https://www.dublincity.ie/dublin-city-development-plan-2016-2022/15-strategic-development-and-regeneration-areas-guiding-principles-development/151-development-principles-7>

<sup>2</sup>

<https://www.dublincity.ie/dublin-city-development-plan-2016-2022/15-strategic-development-and-regeneration-areas-guiding-principles-development/151-development-principles-7>

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- “To promote the expansion of the Docklands’ residential population, cater for life-cycle requirements of the existing population”
  - “To provide for residential choice with schemes conducive to family living”

We believe that both of these principles are violated by an application that is primarily one bed units.

### 3. Cultural Centre for the community

In the “Inspector’s Report on Recommended Opinion ABP-306163-19” the inspector makes the following observation on foot of the Consultation Meeting.

*6.5.7 In relation to the Community/Cultural Building, ABP representatives sought further elaboration/discussion of the proposed uses and management of this building to ensure that it operates as a viable social, community and artistic space. The issue of flexibility in the design approach to ensure space is suitable and appropriate for a range of end users was also discussed.*

Page 50 of the applications’ Architectural Design Statement makes reference to this observation but does not, in our opinion, adequately answer the question posed.

In particular there is nothing about how this space will “*operate as a viable social, community and artistic space*” or how the space will be managed.

Should the application be approved we would request that An Bord Pleanála include conditions that ensure that the the Cultural Centre is practically available to the wider community including measures to ensure that non-commercial community activities are not discouraged from using the space by:

- Lack of access to suitable space within the centre at suitable times
- Lack of ability to have long term, recurring bookings of the space
- Commercially focused pricing for the space

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## 4. Local employment

With regards to the section in Guiding Principles for Development of Strategic Development and Regeneration Areas<sup>3</sup> on employment we note the following requirement:

*“To maximise the employment generating opportunities of the support services sector including the local enterprise office under Dublin City Council, as well as enterprise activity with a range of key skilled, semi-skilled and unskilled workers as part of the overall economic regeneration of the Docklands area”*

We note that the Environmental Impact Assessment Report says “The Operational Phase will also have a positive impact on employment” but we’re not clear how this might impact employment for skilled, semi-skilled and unskilled workers. We’d like a condition of any permission be that skilled, semi-skilled and unskilled workers be encouraged from the local area where possible for the Operational Phase.

## 5. Trees and green space

The area is currently not well covered with green space or trees. We believe that the development could do more in terms of integrating some green space into the urban realm.

Kind Regards,



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Neasa Hourigan TD, Dublin Central

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<https://www.dublincity.ie/dublin-city-development-plan-2016-2022/15-strategic-development-and-regeneration-areas-guiding-principles-development/151-development-principles-7>

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Cllr. Janet Horner, North Inner City