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Neasa Hourigan TD  
Leinster House  
Kildare St  
Dublin 2

Planning Application Ref: 3966/20 17-21 Foley Street

Dear Sir/Madam,

I wish to comment on the above planning application on behalf of myself 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 makes it an unsuitable application.

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

#### 1/ Building Height - relative to existing buildings

At over 41m the building is nearly double the size of the surrounding buildings. The building as planned will be incongruent with the existing streetscape and will result in loss of light for a number of the surrounding buildings.

#### 2/ Building Height - w.r.t. Dublin City Development Plan

Based on the Dublin City Development plan our understanding is that the limit for residential buildings in the Inner City is 24m. At over 41m this application exceeds that limit. While this is an inner city location close to transport links we cannot understand a justification for exceeding the limit to that degree.

#### 3/ Co-living and positive contribution

Section 3.2 of the "Urban Development and Building Heights" requires "The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood."

It is our view that there is an overconcentration of planning awarded for "temporary / transient" accommodation in both the immediate and wider areas. It is unlikely that the co-living model suggested will be used as long term accommodation given that it is not suitable for couples or families and given the size of the dwellings. Residents will be "temporary / transient" without any real long term attachment to the area.

As such we do not believe that the development “positively contributes to the mix of uses”. In fact we believe that the development will see the area primarily serve the needs of temporary / transient residents over the needs of people who already live in the community or who wish to put down roots in the community.

We would also encourage Dublin City Council to view the application in light of the number of applications for co-living that have been approved in the wider North Inner City. While there might be a place for a small amount of such developments it's difficult to see that the volume of such applications being approved is the best use of the limited land bank in the inner city.

#### 4/ Co-living and COVID

Dublin City Council needs to take into consideration the suitability of accommodation that relies on communal shared space in an era where all health advice around COVID-19 involves distancing ourselves, insofar as possible, from others. Even with a vaccine in place for COVID-19 experts agree that it is likely we will see similar diseases. There is an onus on Dublin City Council to plan for such diseases by providing people with accommodation that facilitates some sort of isolation.

#### 5/ Ministerial ban on co-living

In November the Minister for Housing, Planning and Local Government announced a de-facto ban on co-living which came into force on the 22nd December 2020. While the Ministerial ban may not apply retrospectively we feel that, if the merits of the application are in the balance, the Ministerial ban should be relied upon to refuse the application.

Is mise le meas,  
Neasa Hourigan TD

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