
Neasa Hourigan TD
Leinster House
Kildare Street
Dublin 2

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

25th January 2021

Re: Case No. 308875: Phibsborough Shopping Centre and 345-349 North Circular Road, Dublin 7.

Dear Sir/Madam,

We wish to comment on the above planning application on behalf of Neasa Hourigan TD, Cllr. Janet Horner, Cllr. Darcy Lonergan and the co-signatories below.

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. Mix of dwelling typologies

Section 3.2 of the “Urban Development and Building Heights”¹ 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. As such the residents will be “temporary / transient” without any real long term attachment to the area.

In addition to the rooms covered in the application, in the vicinity of the application site there are a number of applications for similar “temporary / transient” accommodation (e.g. hotels, aparthotels, student accommodation). This is not an exhaustive list:

- Grangegorman Planning Scheme² approximately 1,500- 2,000 bed spaces
- 2838/15 - 463 student/tourist beds
- 4341/16 - 77 student/tourist accommodation Dominick Street
- 3453/15 - 108 student/tourist accommodation Dominick Street
- 2382/16 - 130 student/tourist accommodation Dominick Street
- 2370/19 - 195 bedroom hotel
- 3629/17 - 343 aparthotel units
- 4179/19 - 278 bedroom hotel
- 2560/17 - 249 bedroom hotel
- 3274/20 - hotel will comprise 98 No. bedrooms

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 An Bord Pleanála to view the application in light of the number of applications for co-living that have been approved in the

¹

https://www.housing.gov.ie/sites/default/files/publications/files/urban_development_and_building_height_guidelines_for_planning_authorities_december_2018_0.pdf

² <https://www.dublincity.ie/sites/default/files/2020-12/gg-ps.pdf> Chapter 4, Page 52

wider area. 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.

2. Co-living & COVID-19

An Bord Pleanála 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 agree³ that it is likely we will see similar diseases. There is an onus on An Bord Pleanála to plan for such diseases by providing people with accommodation that facilitates some sort of isolation.

3. Ministerial ban on co-living

In November the Minister for Housing, Planning and Local Government announced a de-facto ban on co-living⁴ 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.

4. Consideration on a de-novo basis

We request that the application be reviewed on a de-novo basis. Applications approved for student accommodation should not be used as a wedge to introduce applications for superficially similar but drastically different accommodation types. Our request is that this application is reviewed as if it were a new application for that site.

Kind Regards,



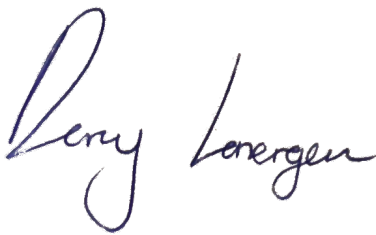
³ <https://www.ft.com/content/dc33f21b-740f-4be8-9947-b47439f557d2>

⁴ <https://www.gov.ie/en/press-release/c8bfc-statement-from-minister-obrien-on-co-living/>

Neasa Hourigan TD, Dublin Central



Cllr. Janet Horner, North Inner City



Cllr. Darcy Lonergan, Cabra-Glasnevin

Co-signatories

1. <redacted>