
Neasa Hourigan TD
Leinster House
Kildare Street
Dublin 2

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

27th October 2020

Re: Case No. 308228. Demolition of all existing structures, construction of 360 no. shared accommodation bedrooms and associated site works. No's. 16/17 Halston Street, 4/5 Little Green Street, 2 Little Green Street, 6 Mary's Lane, 8 Mary's Lane, and 21 Halston Street, Dublin 7.

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 sites 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. Dwelling typologies

Section 3.2 of the “Urban Development and Building Heights”¹ says

“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 360 rooms covered in the application, in the immediate vicinity of the application sites there are a number of applications (1,163 rooms based on non-exhaustive list below) for similar “temporary / transient” accommodation (e.g. hotels and aparthotels).

- 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

¹

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



Staycity Aparthotel opposite sites C & B (Ref. 3629/17)

As such we do not believe that the development “positively contributes to the mix of uses”. In fact we believe that that the development will be a step in the direction of turning the Markets area into a “Northside Templebar” - an area designed primarily to 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 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. 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 our immediate families.

3. Under review

The Minister for Housing, Planning and Local Government has stated his intention² is to come back to Dáil Éireann in the autumn with a review of shared housing. In light of this review it may be wise for An Bord Pleanála to pause such applications pending that review.

4. Height

There are a number of issues with the current height of the development:

- Reaching a height of 14 storeys the development is simply too high for the area. We note the arguments made in the Material Contravention Statement but feel that the height is nonetheless excessive.
- The application makes a number of references to developments under planning review in support of the excessive height of the buildings in the application. Our belief is that no consideration can be given to projects that have not yet received planning permission.
- The application makes a number of references to developments which have planning permission and/or are already under construction. The applicant's view seems to be that if there are already tall buildings in the area then this supports additional tall buildings in the area. Our view however is the exact opposite. The area contains many narrow streets and, given that there is already permission for a number of tall buildings in the area, An Bord Pleanála should reject any contravention of the existing height guidelines.

5. Impact on community facilities

There is a school (Presentation Primary School, Halston St) and a park (St. Michan's Park) in the vicinity of the development. The area is not over-served with green spaces and or recreational areas.

We would ask that An Bord Pleanála consider the following:

- We note the light and shadow report included in the application. Given the limited green space in the area I'd ask that as much of the sunlight as possible to the park be protected. The application relies

² https://www.oireachtas.ie/en/debates/debate/dail/2020-07-23/10/#spk_59

on the BRE Guidelines but these guidelines note: “The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy”. An Bord Pleanála does not need to adhere rigidly to the guidelines.

- We note the development’s choice not to provide for car spaces given the proximity to the city centre and transport links. Nonetheless we feel consideration should be given the traffic generated by such a development given the presence of the school and the narrow streets.
- Overall there is zero gain for the existing community residents given that all facilities (bar the café) will be residents only. No green space or public space is provided by this development.

6. Relations with historical sites

The sites in the planning applications are surrounded by a number of historical sites: including:

- St. Michan's Church - construction commenced in 1810
- Green Street Courthouse - the court where, among other notable figures, Robert Emmet's trial took place.
- The Dublin Fruit Market opened in 1892

We appreciate that, in any living city, historical sites sit alongside new developments. That said such new developments need to be sympathetic to the historical context.



St. Michan's Church - overlooked by site D

Our belief is that the development does not fit with the historical sites with regard to:

- Scale: the development dwarfs the historical sites
- Finish: the development seems to have done little to differentiate itself visually from similar developments all over the city (e.g. 1

Gardier Street or Aspen Ballymun). We believe that the site merits a design with a stronger aesthetic/architectural appeal.

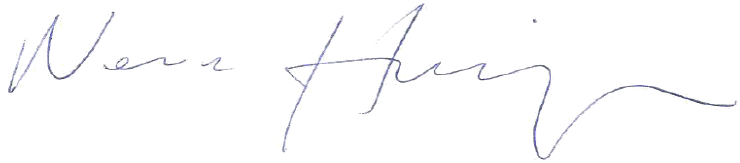
The Fruit Market in particular is problematic in this regard given that it is to be the anchor for a redevelopment of the area. A development unsympathetic to the local historical sites will hamper the redevelopment of the Fruit Market.



The Fruit Market - overlooked by site A

We hope that you will take these observations into consideration.

Kind Regards,



Neasa Hourigan TD, Dublin Central



Cllr. Janet Horner, North Inner City