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Neasa Hourigan TD  
Leinster House, Kildare Street  
Dublin 2

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1, D01 V902

26th Jan 2022

Re: PL29N.312298 77-80, King Street North, Smithfield, Dublin 7. D07 TP22  
(3617/21)

Dear Sir/Madam,

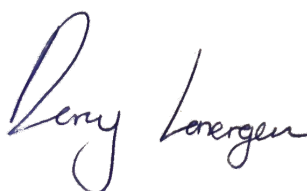
We wish to comment on the above planning appeal. We have included our observations below and submitted the required fee.

Kind Regards,



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Neasa Hourigan TD, Dublin Central



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Cllr. Darcy Lonergan, Cabra-Glasnevin



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Cllr. Janet Horner, North Inner City

And X co-signatories listed in Appendix A

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## Observations

### General

Although the changes to the proposal indicate a welcome recognition of the impact of the project on both the site and the existing business it does constitute a significant redesign. As such the documentation provided is entirely insufficient to consider the changes to the proposal. In the original judgement a number of issues were set out as being of concern including the following:

- The overbearing nature of the design
- The scale in relation to the protected structure on site and its adherence to the the Architectural Heritage Protection Guidelines
- Its undue dominance on the streetscape and treatment of the urban grain
- The amenity of the adjoining residents on Red Cow Lane, Brunswick Street and North King Street including visual impact and loss of sunlight
- The impact of the development on the cultural amenity of the Cobblestone pub.

The changes to the proposal include the removal of all the proposed structure from 81 King Street North, the reduction of overall height from 9 to 7 storeys and the removal of any structure above the Cobblestone. This constitutes a significant redesign of the proposal.

The new documentation fails to provide sufficient information to consider material changes to the scale, height and bulk of the development as regards sunlight analysis, visual impact and the proposal dominance on the street. It also fails to provide basic information on the phasing of construction to minimise disturbance to the Cobblestone pub in line with the guidance that the amenity must be safeguarded.

The drawings provided in the appeal are not new drawings but the existing drawings with areas for deletion outlined. The scale of the changes will extensively change the structure of the building and it's layout but no information on these changes have been provided. No new streetscapes, illustrations or internal room views have been provided.

It would be appropriate for this design proposal to be submitted as a full redesign and separate planning permission rather than an appeal.

## DCC ground 1 - Protection of architectural heritage

No information has been provided as to the nature of the retention of the proposed structure at 81 King Street North. There is no evidence provided on how the proposal will operate in adjacency to the existing structures on site. While the project has been significantly scaled back there is no information as to how the project will operate as a whole site and what remedial works may be undertaken to the existing brick facades at 78 and 79 King Street North. There is no information provided on how these structures will be safeguarded during the construction work undertaken during this project.

Without any 3D renders or plans for floors that overlook the Cobblestone building it is difficult to say that the new design will not be *“overbearing, excessive and out of scale and character with the prevailing architectural context”*. No details on the treatment of the facades (in red in Figure 1 below) overlooking the Cobblestone have been provided. It appears that there will be no step back of the hotel from the protected structure as has been done in similar developments (e.g. the hotel built adjacent to Fallons on The Coombe)

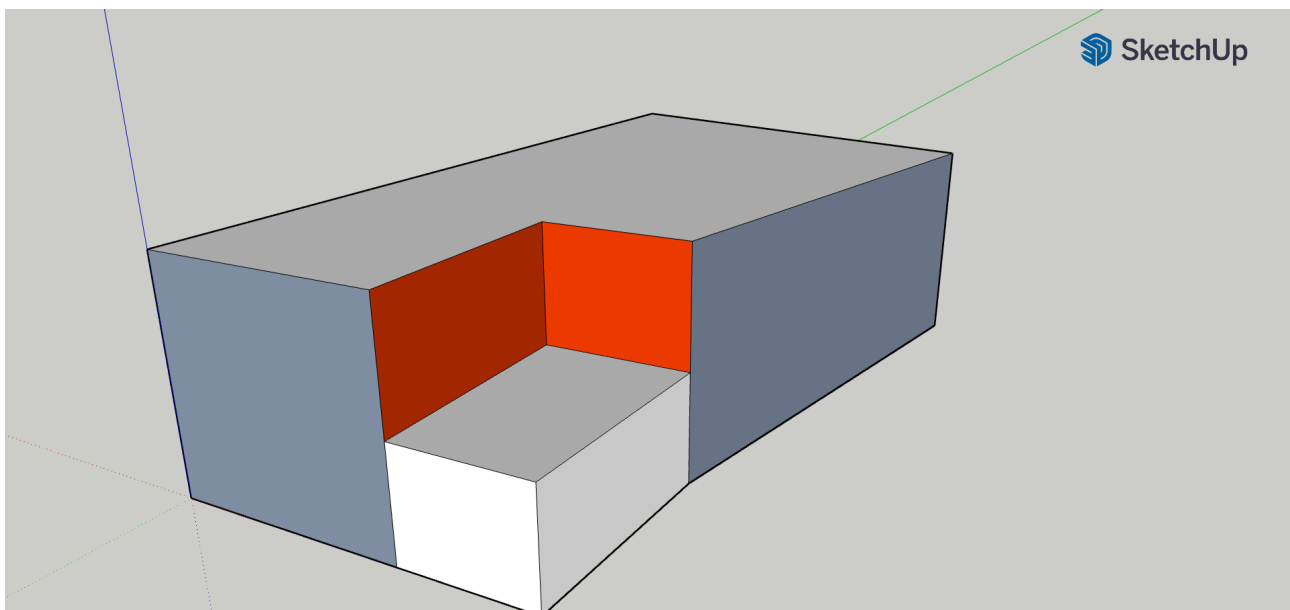


Figure 1

## DCC ground 2 - Inappropriate design

The new proposal does not provide any further details or visualisation on the treatment of the sensitive corner site outlined as particularly important in the Council's decision. The outlining of urban grain as relevant would suggest a consideration that is volumetric to the site, not simply a concern in terms of height. There is no information provided on the facade treatment as it relates to

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the visual impact of the proposed volume onsite and it would be useful to see facades drawings that outline the new material treatment of the proposed development.

### DCC ground 3 - Amenities of adjoining residents

Given the scale of the development it is not sufficient to simply say that removing two floors will reduce the impact on the surrounding properties. The daylight and sunlight study should have been updated to validate this assertion.

In addition other options should have been considered (e.g. step-backs for higher floors) that might have a better sunlight outcome for the neighbours.

### DCC ground 4 - Culture

While it is welcome that the new proposal recognises the cultural offering of, not just the Cobblestone Pub itself but the Backroom venue, there are a number of open questions on the proposed performing space.

- Ownership and management of the space - no details have been provided on how the new space will be managed. The current space made an important contribution to the cultural offering of the area in a large part because of the way in which it was managed. Without a management plan for the space it is not clear that a hotel operator would manage the space the same manner.
- The existing Backroom venue connects directly to the Cobblestone pub while the proposed performing space is separated by a large block of toilets. It is debatable whether, what is now effectively a standalone space in a hotel, would be an effective cultural offering.
- The size of the new performing space. The appeal documentation says that the space will be “*contained within the existing retained historic yard to the rear of the site*”. While there is a room marked on the plans it is not clear how much of this room is being allocated to the proposed performing space.
- It is not clear from the application how this space would be protected into the future. Our concern would be that the usage of space as designed would decline over time and eventually its use would be discontinued.

Given the uncertainty we don't feel the appeal's proposals address Dublin City Council's ground for refusal.

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## Appendix A co-signatories