
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. 308841: Hendrons' Building and wider site, 36-40 Dominick Street Upper, Broadstone, 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 280 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, apartment hotels, student accommodation). This is not an exhaustive list:

- Broadstone Hall directly across from application site
- 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 apartment hotel 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.

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

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. Compliance with zoning

The current zoning for the site is Z3 "To provide for and improve neighbourhood facilities," detailed further here.³

There are a number of areas where we feel the application does not meet this zoning requirement:

Housing at ground level

The zoning description states that (our emphasis) "Neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level."

The application has 41 rooms at ground level (21 rooms at Lower Ground, 20 rooms at Upper Ground) including associated shared living kitchen/living space.

Local Facilities

The zoning description states that "These are areas that provide local facilities"

There are three facilities listed in the application

- Café - the café size is not broken out in the "Schedule of Accommodation and Areas" but from the drawings it appears to be a very small portion of the space (approximately 10 sqm). Additionally there is already a coffee shop literally across the street, Jay's Cafe, so it is not clear how much the development's café adds to the area.
- Gym - 10 exercise machines and some free weights do not represent a material facility. The small size of the locker room and apparent lack of showers would indicate that the gym is in fact intended as a resource for the residents as opposed to the residents of the locality.

³

<https://www.dublincity.ie/dublin-city-development-plan-2016-2022/14-land-use-zoning/14-8-primary-land-use-zoning-categories/1483-neighbourhood-centres-zone-z3>

Given the city centre nature of the site there are a number of gyms in close proximity.

- Yoga/Pilates Studio - an empty room is not a material facility. Given the city centre nature of the site there are a number of yoga studios in close proximity.

Even if one were to accept that the 432.3 sqm of Publicly Accessible space represented some sort of local facility that space would represent just 3.7% of the total 11,383.7 sqm of space. For the avoidance of doubt we do not equate Publicly Accessible space with a local facility as it includes:

- Reception - presumably this is reception for the co-living space
- Back of House - by definition, not even Publicly Accessible
- Indoor seating - again presumably this is aimed at the co-living residents and members of the public will not be encouraged to come to the building to use this space.

3. 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 agree⁴ 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.

4. Ministerial ban on co-living

In November the Minister for Housing, Planning and Local Government announced a de-facto ban on co-living⁵ 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.

5. Height

We note that the site is in the middle of an area with a lot of single storey/two storey residential units. Outside of the fact that the

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

⁵ <https://www.gov.ie/en/press-release/c8bfc-statement-from-minister-obrien-on-co-living/>

development exceeds the Dublin City Development Plan's height limit we feel that it is totally incongruent with the existing housing stock. In particular View 11 and View 4 along Palmerston Place and Auburn Street respectively demonstrate how out of place the development is.



View 11



View 4

6. Schedule of Accommodation and Areas

We note that the “Schedule of Accommodation and Areas”⁶ provided in the application details the number of units but not the floor size of the units. It also lists areas as Publicly Accessible that are not Publicly Accessible (e.g. Back of House). We’d ask that An Bord Pleanála put in place some minimum standards for documentation associated with similar future applications as this will ensure all are best positioned to provide their feedback on such applications.

7. Conservation Approach

The National Inventory of Architectural Heritage describes Hendrons as ‘a distinctive and well-known landmark in the area, a rare example of twentieth-century vernacular modernism, and a visual reminder of the importance of Hendrons as an agent of change and industrialization in the early days of the State’. The planning permission sought does little to safeguard this architectural legacy. The project would significantly damage the character and original form of the building on two counts:

1. The original detached six-bay four-storey former showroom and workshop, built 1946-59, having two-storey workshop with ten-bay side elevation to rear (east), and three-bay single-storey entrance block to front (west) elevation will be almost totally destroyed by the proposal. The merit of the Hendrons building is the adaptive architectural approach, something distinctive to industrial buildings and now very rare to find intact. The proposal seems to entirely clear the back of the building to make way for new development rendering the section retained as facadism and not conservation of our built heritage
2. The building is significant in its demonstration of the influences of International Modernism in its flat roof, white rendered walls, and modern materials. The current proposal would see the original roofline and parapet entirely altered with a construction to a third floor. This represents a significant degrading of the architectural character of the buildings.

⁶

<https://westernwayshd.ie/library/docs/architecture/Schedule%20of%20Accommodation%20and%20Areas.pdf>

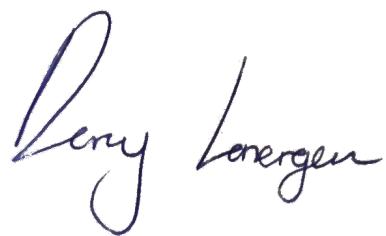
Kind Regards,



Neasa Hourigan TD, Dublin Central



Cllr. Janet Horner, North Inner City



Cllr. Darcy Lonergan, Cabra-Glasnevin

Co-signatories

1. <Redacted>