



Green Party  
C/O Richard O'Reilly Room,  
City Hall,  
Dublin 2.

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

**RE: Strategic Housing Development Ref. no: SHD0015/20**

To Whom It May Concern,

As local Green Party Councillors for the South East Area, we – Councillor Carolyn Moore, Kimmage Rathmines, Councillor Claire Byrne, South East Inner City, and Lord Mayor Hazel Chu, Pembroke - wish to make the following observations on the planning application for 348 Harold's Cross Road, Dublin 6, Strategic Housing Development Reference number SHD 0015/20.

Like so many citizens of Dublin, we have grave concerns about the introduction of a shared living, or co-living model of accommodation to the Irish market; as Dublin City Councillors and representatives of communities experiencing desperate shortages of good quality residential accommodation, we do not view this type of development as fit for purpose when it comes to addressing those shortages while growing and enhancing those communities in a sustainable way.

While we welcome the development of the site of the former Kenilworth Motors and appreciate that the urban village of Harold's Cross – as outlined in the 'Justification Report' which accompanies this application – is a desirable location for young professionals, we feel that a shared-living model is totally unsuitable for this area for reasons we will outline below.

However, primarily we feel it should be noted by An Bord Pleanála that the viability of the co-living model is as yet untested in the Irish market, and until it is established that people a) wish to live this way, b) can safely live this way in a world irrevocably impacted by Covid-19, and c) can afford to live this way with a deep recession on the horizon, then it would be reckless to continue to grant planning permission for further shared or co-living developments.

To underscore the above point, we need look no further than the proliferation of purpose-built student accommodation in the South Inner City, the rapid delivery

of which the SHD process was designed to facilitate. Much of this accommodation now lies empty or is being actively being repurposed to a 'co-living' model due to uncertainty around the upcoming academic year. Yet despite this, further developments of student accommodation are still in progress within a 2 km radius of the proposed co-living development at 348 Harold's Cross Road. This, combined with the fact that remote working is now becoming a long-term reality for many, throws into question the demographic information cited in the 'Justification Report':

- *4.5 Summary – Existing Demographics Demonstrate the Area is Attractive to the Target Market. The demographics of the Study Area demonstrate that the area is attractive to the target market of young adults as it is characterised by a higher proportion of working population (25-64 years) 62%, and a particularly high percentage of those in the 25-34 years age cohort. Thus, people in the age range targeted by the proposed development are already attracted to the study area, which is considered likely to relate to its proximity to areas of employment.*

Flooding the market with a single model of accommodation (and a model which has limited, and as yet unproven appeal) would be ill-advised even if we weren't in the midst of a global pandemic, but the current public health crisis makes it imperative that the future viability and safety of any shared-living model is properly established before any more of these applications are even considered.

Housing Minister Darragh O'Brien has pledged to conduct a review into the provision of co-living to ensure "there are no unintended consequences to proceeding with such schemes", and we would urge that planning permission be refused until such a review has taken place. Co-living is the antithesis of responsible, sustainable development, and it would be irresponsible in the extreme to risk destroying the fabric of our city and our communities with a proliferation of sub-standard accommodation that undermines the city's development goals, only to find out they are economically unviable too. The established fall-back use of this model as tourist accommodation must likewise be assessed for viability with that industry now decimated by the impacts of the global pandemic.

The well-established community of Harold's Cross, with schools and family-friendly infrastructure in place, has nothing to gain from this type of development, and we support their contention that this application should be refused on the grounds that:

- This site has been zoned for residential, and we would question the assertion that this model of accommodation conforms to the terms of residential zoning. This seems to be confirmed within the Justification Report, where the developer states this facility "will accommodate people on a short to medium term basis who are working in the local area and Dublin City Centre" but also cites short term use by families of patients in nearby hospitals as a possible target demographic for this accommodation, which effectively cements its status as shared living/aparthotel. For that reason it should be considered ineligible as a SHD application.

- There is a total lack of community gain accompanying the proposed development, which provides for no public space, no public amenities, and no permeability to the surrounding community. It was suggested at a presentation to the South East Area Committee that a development contribution might be paid in lieu of providing 20% public space in accordance with the Dublin City Development Plan, however such contributions are not ringfenced for the area of the development, so there is no guarantee that the residents of Harold's Cross would benefit from this.
- The scale of this development is one bed over the qualifying minimum for a SHD, and a feasibility study by BKD Architects conducted in advance of the sale of the site suggested it might be suitable for 140 units of student accommodation. It would appear therefore that the proposed 201 bed development is overly dense and out of scale with the surrounding community. Additionally it might be suggested that a proposal for 201 beds on a site previously assessed as suitable for 140 beds is a cynical exercise in circumventing planning processes, particularly since Dublin City Council have previously rejected co-living proposals of lesser density in the vicinity of this site.
- As previously mentioned, co-living is a flawed approach to tackling our housing crisis. Similar co- or shared living developments have been rejected by Dublin City Council on the basis of the room-to-shared amenity ratio being too high – however this development has over three times the number of rooms sharing facilities, with one just shared kitchen/living/dining room per:
  - 10 rooms on the ground floor
  - 47 rooms on the first floor
  - 41 rooms on the second floor
  - 41 rooms on the third floor
  - 35 rooms on the fourth floor.

This is an incredible ratio of residents per shared facility, especially given that DCC rejected a co-living proposal on Ardee Road on the grounds that one kitchen/living/dining area per floor of 13-18 residents constituted 'an objectionable level of shared facilities.'

It is further worth noting that in the current public health crisis, the proposed ratio of shared facilities to residents represents a genuine Covid-19 transmission risk and raises the possibility of this and similar developments becoming a cluster risk. This would appear to have been acknowledged by the proposed operators of this development, CRM, who – as outlined in the Justification Report - have closed off the shared facilities in existing co-living developments being managed by them in other jurisdictions. Without the use of these shared facilities, and in light of on-going public health restrictions, we are potentially condemning residents to possibly live and work in a space as small as 12 sqm. This is unconscionable in the 21<sup>st</sup> century.

- The residents and representatives of Harold's Cross have been calling for the development of a local area plan for a number of years. In the absence of such a plan, a development of this scale, constituting a model of accommodation that is geared towards transient tenants, is understandably causing them grave concern. As representatives of the South East Area we believe these concerns are well founded. Harold's Cross, like many of our urban villages, needs a local area plan to maintain a sense of interconnectivity between the numerous developments currently happening or under consideration.
- Harold's Cross is an historic urban village, it has schools, amenities and an existing infrastructure that works for families. Per the Dublin City Development Plan we should be looking at enhancing the village with developments that allow people to settle in the community and build their lives there; developments that bring amenities and commerce to the core of the community. This development will enjoy 40 m of street frontage with huge commercial and amenity potential for the local area which is being overlooked to squeeze as many beds as possibly onto the footprint of the site.
- People want sustainable communities and long term homes in Harold's Cross, and 201 luxuriously outfitted bedsits built-to-let by a foreign investment fund will not serve this community or the wider South Inner City. Temporary, shared living does not work in the context of an urban village with vast potential to become a thriving, vibrant and sustainable community if development is done well and in consultation with the existing community.

In conclusion, we fundamentally object to this Board permitting significant and lasting changes to be made to the fabric of Harold's Cross by an overseas developer with profit as a primary consideration. We feel that allowing co-living to be progressed as a strategy to address a housing crisis in this, or any other city, is an incredibly shortsighted approach, which lacks empathy for those who find themselves unable to find affordable, quality accommodation and security of tenure. And finally, we would reiterate that in light of the on-going public health emergency and pending a review into the provision of co-living by the Minister for Housing, no public body should be granting permission for developments comprised partially or entirely of co-living units.

Councillor Carolyn Moore  
*Green Party Councillor for Kimmage Rathmines*

Councillor Claire Byrne  
*Green Party Councillor for the South East Inner City*

Lord Mayor Hazel Chu  
*Green Party Councillor for Pembroke*