



An
Bord
Pleanála

Inspector's Report ABP-317464-23

Development	Permission & Retention: 1. Retention for completion of modifications. 2, Change of use from office/retail use to tourist hostel. 3. Retention of bike store / maintenance store.
Location	10/11 Liberty Lane, Dublin 8
Planning Authority	Dublin City Council
Planning Authority Reg. Ref.	3553/23
Applicant(s)	Cathal Garrad
Type of Application	Planning Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party v Decision
Appellant(s)	Cathal Garrad
Observer(s)	None
Date of Site Inspection	7 th September 2023
Inspector	D. Aspell

1.0 Site Location and Description

- 1.1. The site is No. 10/11 Liberty Lane, Dublin 8. It is generally 'L'-shaped with two structures on site. The larger structure occupies the majority of the site, with the smaller structure located to the rear. Movement within the site is via a narrow walkway between these buildings and the site boundary.
- 1.2. The premises appears to be vacant. The application documentation states that the site had temporary unauthorised residential use which ceased in 2022.
- 1.3. The larger structure is a 2-storey, flat-roof steel frame structure. The side and rear elevations are comprised primarily of orientated strand board (OSB) clad in corrugated metal sheeting. The front elevation is comprised of exposed, partially painted strand board. There is an external stairwell on the southern side connecting ground and first floor. There are no internal stairs.
- 1.4. Internally, the ground floor comprises 16 no. rooms off two corridors. Three rooms contain kitchen appliances. One room contains toilets, showers, and urinals. Most of the smaller rooms contain a single bed and storage with a fridge and/or heating appliances. The first floor comprises 14 no. rooms off two corridors and a large central space. As at ground floor, these rooms generally contain a single bed, storage, and appliances. Water intrusion is evident throughout the structure, with significant water damage in ceilings, walls and floors on both levels.
- 1.5. The smaller structure comprises a store, toilet room, and shower room.
- 1.6. The surrounding area is generally mixed-use. Adjacent to the south is a 2- and 3-storey premises ('Opium Live' nightclub venue & restaurant). Adjacent to the north is a yard to the rear of No. 30 Wexford Street (The Jar public house) within which a covered outdoor area associated with The Jar is under construction. To the east, the site is adjacent the rear of No. 28 (previously 'Roma' takeaway) and No. 29 ('TN Beauty Salon') Wexford Street. Also to the east, at 1st, 2nd and 3rd floor, a number of residential units face the site. To the west, across Liberty Lane, is St. Kevin's Park.
- 1.7. Liberty Lane is a single-width lane between Camden Row and Kevin Street. There is mixed use development at either end of the Lane, with the remainder serving as rear access to buildings on Wexford Street. The front boundary of the site comprises a wall and gate. There is a small irregularly shaped area at the front of the site.

2.0 Proposed Development

2.1. The planning application proposed the following:

- 1. Retention and completion of modifications (layout and elevations) to existing two-storey building;
- 2. Change of use (368 sqm) from approved office / retail use to tourist hostel;
- 3. Retention of 29 sqm single storey bike store / maintenance store.

2.2. The proposed drawings show numerous changes to the internal layout, building elevations and external space, as follows:

- At ground floor, changing the layout to reduce the existing 15 no. rooms to 12 no. rooms. These rooms would comprise 7 no. bedrooms, 2 no. store rooms, a lounge/kitchenette, an accessible w.c., and a shower / toilet room. The bedrooms would comprise bunk bed rooms and an accessible *en suite* double-bed bedroom. A reception desk is shown in the entrance corridor.
- At first floor, changing the layout to reduce the existing 14 no. rooms to 9 no. rooms. These 9 no. rooms would comprise 7 no. bedrooms and 2 no. store rooms. The bedrooms would comprise bunk bed rooms and 2 no. double bed bedrooms. A line of 2 no. toilets and 2 no. showers are also indicated.
- The development is to sleep 40 no. people at maximum.
- The existing external stairs is to be removed, and an internal stairs provided.
- Within the smaller structure to the rear, the existing shower located off the bike store and external toilet is to remain, with minor changes.
- The external paved area is proposed for seating and bin storage.
- No car parking is proposed. Ten indoor cycle parking spaces are proposed.

2.3. In relation to the proposed hostel development, I note the following:

- Occupant amenity:

Two of the 14 no. bedrooms would be north facing. Whilst there are external windows to every bedroom, with the exception of 3 no. rooms at first floor, all of the remaining 11 no. rooms (c.79%) would face an adjoining wall at a

distance of between c.0.6m and c.1.5m. For 9 no. of these rooms the adjoining wall would be a two-storey wall. No assessment of sunlight or daylight access is submitted.

A nightclub is adjacent to the south. A public house is to the east, with its outdoor area under construction to the north. Both are licensed premises and open at night. Both play music, including live music in the case of 'Opium'. No assessment of inward or outward noise impacts is provided.

A number of residential units to the east would directly overlook proposed hostel bedrooms at distances of between c.9m and c.13m.

- Circulation:

The width of the only external circulation route, from Liberty Lane to the rear cycle storage, is between c.0.9m and c.1.5m. This route is c.40m from the front gate to the rear storage, with two right angle bends along its length.

Limited details of ground and finished floor levels, including accessibility of the communal areas are provided.

- Waste management

Limited details are provided for the location and volume of internal temporary waste storage. Limited details are provided of external waste storage, including volumes.

- Miscellaneous

Limited details of the boundary treatment between Liberty Lane and the proposed patio are provided, however the contiguous elevations appear to indicate that there would be no boundary treatment or gates.

Limited details of laundry, drying and airing facilities are provided.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. Dublin City Council issued a notification to refuse permission (6th June 2023) for 1 no. reason:

“The proposed development for retention and completion to an existing two storey building with a change of use to tourist hostel is considered to result in a substandard development providing for poor quality accommodation in an inadequate and poorly designed building, in an area identified as having an overconcentration of tourist accommodation, which would negatively impact on the provision to provide for a dynamic mix of uses within the city centre and fail to sustain the vitality of the inner city as outlined in the Z5 zoning objective of the site. The proposal would therefore seriously injure the amenity of property in the vicinity and would be contrary to Section 15.14.1 of the Dublin City Development Plan 2022-2028 setting an undesirable precedent of other similar developments and as such would be contrary to the proper planning and sustainable development of this location.”

3.2. Planning Authority Reports

3.2.1. Planning report: The planning authority report made the following points:

- The existing building was not built in line with the planning permission granted in 2017 (Ref. 2113/17) and does not have an existing valid permission;
- The land use zoning objective for the area is Z5 and tourist hostel use is permitted in principle on Z5 lands;
- The report assumes Section 15.14.1 ‘Hotels and Aparthotels’ of the Dublin City Development Plan applies to tourist hostels;
- An analysis of the supply and demand for tourism related accommodation in the City is yet to be carried out by the City Council;
- The applicant has not provided details on hostel / hotel provision within 500m;
- The area has been identified as having an overconcentration of hotel type developments, and there is concern in relation to Section 15.14.1 and Section 15.14.2 of the development plan in relation to an oversupply in the area;
- Rooms would have windows under 1m away from the adjoining boundary, with little or no aspect, and limited sunlight. The proposal therefore provides for poor quality accommodation, would seriously impact the area, and would provide a precedent for unsuitable tourist accommodation on unsuitable sites.

- The external façade is substandard and has not been designed with a residential use in mind;
- The proposal provides for unsuitable, poor quality tourist accommodation in a building which has not been adequately designed for such use, having unauthorised windows on the side elevation less than 1m from the shared boundaries. The area has been identified as having an oversupply of tourist accommodation and as such the proposal is considered contrary to the Z5 zoning objective for the site.

The notification of decision was as per the planning report recommendation.

Other Technical Reports

3.2.2. Environmental Health Officer / Air Quality Monitoring and Noise Control Unit: The report received stated no objection to the retention and completion provided the applicant agrees to adhere to the Air Quality Monitoring and Noise Control Unit's Good Practice Guide for Construction and Demolition.

3.2.3. Drainage Division – No objection subject to condition.

3.3. **Prescribed Bodies**

3.3.1. Transport Infrastructure Ireland – Section 49 levy.

3.4. **Third Party Observations**

3.4.1. None recorded.

4.0 **Planning History**

4.1. Subject site:

4.1.1. Ref. 2113/17: Planning permission was granted by the City Council on 24th July 2017 for a new 3-storey building to contain a ground floor retail unit, and office unit on the 2nd and 3rd floor levels, including ancillary works, and cycle parking. At the time that application was lodged the site comprised a yard.

4.1.2. Twelve conditions were attached. Condition No. 3 required the height of the building to be reduced by 0.5m, to be achieved by a reduction in height of the 3rd floor to 3.5m. No compliance records are available on the public file.

4.1.3. The permitted development comprised an open plan retail unit at ground floor accessed from Liberty Lane. Also permitted at ground floor was an office entrance, corridor, stairwell, bike store and toilets, with a yard to the rear. The permitted 2nd and 3rd floors were open-plan office space, lift/stair, toilets and a light well.

4.1.4. In comparing the existing and permitted developments I note the following:

- In broad terms, the existing structure is set back from the western, southern, and (partially) northern boundaries of the site, whereas the permitted building abutted the perimeter on those sides. The existing structure incorporates windows on the northern and southern elevations whereas the permitted building did not;
- The existing structure is 2-storey whereas the permitted building was 3-storey;
- There is a single storey structure to the rear of the site, whereas in the permitted development this area comprised an open yard;
- The existing ground floor comprises 16 no. rooms whereas the permitted ground floor comprised an open plan retail unit and internal office access;
- The existing 1st floor comprises 14 no. rooms accessed from a central space, whereas the permitted 1st floor comprised open plan office space;
- The existing structure has an external stairwell only, whereas the permitted building had an internal stair and lift core;
- With regard to the front elevation, the existing elevation comprises doors and windows of varying sizes, whereas the permitted elevation comprised what might be described as a contemporary office building with more extensive glazing on each floor and retail glazing at ground;
- The existing external walls are strand board and metal cladding, whereas the permitted building was to be finished mainly in granite, metal, and brick;
- In broad terms the existing structure was built inside the extent of permitted development in terms of footprint and height.

4.1.5. Nearby sites:

- Ref. 2682/20 (PL29A.309217): Permission granted by the City Council and the Board on appeal (30th August 2021) at the (previously) DIT/TUD site for a 1-to-14 storey (over 3-storey basement) mixed-use (commercial office, residential, creche, café, exhibition space) development (as amended). (Current application for amendment with Dublin City Council Ref. 4308/23).
- Ref. Web1420/21: Permission granted by the City Council (19th October 2021) at 30 Wexford Street (also accessed off Liberty Lane to the rear) for a change of use of the rear service yard (148 sqm) for outdoor licenced use.
- Ref. 5494/22: Permission refused by Dublin City Council (February 2023) at a site on Kevin St and Liberty Lane for demolition of existing buildings on site and construction of an 8-storey hotel comprising 81 no. bedrooms. (**Currently on appeal**, ABP-316103-23).

5.0 Policy Context

5.1. Development Plan

Land use zoning

The site is zoned 'Z5 City Centre', where the land-use zoning objective is *"To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity"*.

Section 6.5.6 'Key Economic Sectors'

Policy CEE26 'Tourism in Dublin'

Policy CEE28 'Visitor Accommodation' seeks: *"To consider applications for additional **hotel, tourist hostel and aparthotel development** having regard to:*

- *the existing character of the area in which the development is proposed including local amenities and facilities;*
- *the existing and proposed mix of uses (including existing levels of visitor accommodation i.e. existing and permitted hotel, aparthotel, Bed and*

Breakfast, short-term letting and student accommodation uses) in the vicinity of any proposed development;

- *the existing and proposed type of existing visitor accommodation i.e. Hotel Classification/Rating, Hostel Accommodation, Family Accommodation, Alternative Accommodation etc., in the vicinity of any proposed development;*
- *the impact of additional visitor accommodation on the wider objective to provide a rich and vibrant range of uses in the city centre including residential, social, cultural and economic functions;*
- *the need to prevent an unacceptable intensification of activity, particularly in predominantly residential areas;*
- *the opportunity presented to provide high quality, designed for purpose spaces that can generate activity at street level and accommodate evening and night-time activities – see also Chapter 12, Objective CUO38.”*

Policy CEE01 ‘Study on the Supply and Demand for Hotels, Aparthotels and Hostels’ states:

- *“It is an Objective of Dublin City Council: CEE01 Study on the Supply and Demand for Hotels, Aparthotels and Hostels To carry out an analysis of the supply and demand for tourism related accommodation including hotels, aparthotels, hostels, Bed and Breakfast Accommodation and other short-term letting in the Dublin City area.”*

Objective CUO38 - Noise Impacts states:

- *“All applications for short or longer term residential proposals (including hotels) that seek permission adjacent to established late night uses such as nightclubs/music venues/public houses/comedy clubs, shall be required to demonstrate in their application, how, firstly through the use of good design and layout; and secondly, through increased sound insulation; they have ensured their development will not cause negative impacts on the adjoining uses in the future. *See also Policy CCUV36”*

Policy CCUV36 ‘New Development’.

Chapter 15 'Development Standards':

Section 15.4 'Key Design Principles', Section 15.4.1 'Healthy Placemaking' states that all developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities. Key principles to consider include the orientation of open space and the accessibility to daylight and sunlight.

Section 15.13.9 'Hostels / Sheltered Accommodation / Family Hubs'.

Section 15.14.1 'Hotels and Aparthotels' seeks: *"To ensure a balance is achieved between the requirement to provide for adequate levels of visitor accommodation and other uses in the city such as residential, social, cultural and economic uses, there will be a general presumption against an overconcentration of hotels and aparthotels."*

Section 15.14.2 'Bed and Breakfast / Guesthouses' states:

*"In determining planning applications for change of use to bed and breakfast, guesthouse, hotel or tourist hostel **in residential areas**, the planning authority will have regard to the following"*

Section 15.14.3 'Short Term Tourist Rental Accommodation'.

The development plan defines 'Hostel (Tourist)' as: *"A building, or part thereof, which would provide meals/ refreshments, sleeping accommodation and entertainment to residents/ tourists only, and is other than a hostel where care or short term homeless accommodation is provided"*.

Appendix 5 Section 3.0 'Cycle Parking Standards' Table 1.

Conservation Areas:

The development plan indicates that the eastern end of the site, corresponding to the store structure at the rear of the site, is within a Conservation Area (Red-Hatched Areas). Section 11.4.3 'Built Heritage Assets of the City' states that these areas require special care in terms of development proposals.

Policy BHA9 Conservation Areas.

Section 15.15.2.2 Conservation Areas states that planning applications for development in Conservation Areas shall respect the existing setting and character of the area; protect the amenities of the surrounding properties and spaces; provide

for an assessment of the visual impact of the development in the surrounding context, and ensure materials and finishes are in keeping with the built environment.

5.2. Natural Heritage Designations

5.2.1. None relevant.

5.3. Environmental Impact Assessment screening

5.3.1. Having regard to the nature of the proposed development comprising change of use and retention and completion of modifications in a serviced urban area, I consider there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. One appeal is received, from the applicant. The appeal is prepared by the applicant's architect and makes the following main points in response to the reason for refusal:

- Some of the existing rooms are small and sub-standard. The application is to address and rectify inappropriate and sub-standard aspects of the building;
- The communal lounge space with kitchenette will have direct access to a south-west facing terrace. There is ample space to locate bins elsewhere;
- Some bedroom windows will have limited views but they will provide ample light and ventilation. This is common in city centre locations. The rooms will primarily be occupied only at night and generally for short stay periods;
- The facility will be comfortable, with quality accommodation, on a difficult site;
- Disagrees with the Council's method of assessing existing stock which groups hostel with hotel accommodation. Whilst there may be an over-proliferation of hotels within 500m there are no tourist hostels of this type. The appeal identifies 5 no. hostels within 1.2km of the site.

- There is no ‘value option’ for young people;
- Since the initial office use was granted, the building is now surrounded by two all-day beer gardens and three live venues, so hostel use is one of the few suitable uses. The younger age profile using budget accommodation is less likely to be disturbed by adjacent noise and more likely to be involved in the city’s nightlife. The low footfall on Liberty Lane makes retail unviable;
- The development is to provide good value short stay accommodation, which is not provided by hotels. This type of accommodation will help alleviate the acute crises in accommodation and hotels;
- Since policy restrictions were introduced on short stay uses there is further pressure on holiday accommodation and lack of options for budget tourists;
- Section 15.14.3 ‘Short Term Tourist Rental Accommodation’ of the development plan applies to the development;
- The proposal is for good value short-stay accommodation which does not exist in the central area, and thus it is a diverse and dynamic use;
- The proposal will provide much-needed animation of the streetscape, and increase daytime footfall in the area and help sustain the vitality of the city;
- The proposal is consistent with the Z5 zoning.

6.1.2. The appeal requests that the Board considers that the lack of affordable tourist accommodation risks Dublin’s reputation suffering damage internationally.

6.2. **Planning Authority Response**

6.2.1. The planning authority response raises no new issues and requests the Board upholds the decision to refuse permission. The authority requests that if retention is granted that conditions be applied regarding Section 48 contributions.

6.3. **Observations**

6.3.1. None.

7.0 Assessment

7.1. Having regard to the foregoing; having examined the application and appeal; having inspected the internal and external parts of the site; and having regard to relevant adopted policies and objectives, I consider the main issues in this appeal are those raised in the reason for refusal, as follows:

- Principle of development
- Quality and design of accommodation;
- Impacts on amenity of property in the vicinity;
- Proposed retention and completion;
- Related matters.

Principle of development

7.2. Tourist hostel development is permissible in the Z5 zoning. Policy CEE28 Visitor Accommodation states that tourist hostel development will be assessed having regard to the character of the area and the proposed mix of uses. In these regards I consider that in principle the proposed use would be acceptable in this location, having regard to the mixed-use character of the area and its location in the city centre.

7.3. Policy CEE28 also requires consideration of applications for tourist hostel development to have regard to existing levels of visitor accommodation in the vicinity, the existing and proposed type of visitor accommodation in the vicinity, and the impact of additional visitor accommodation on the wider objective to provide a rich and vibrant range of uses in the city centre including residential, social, cultural and economic functions.

7.4. The planning authority planning report states that the area has been identified as having an overconcentration of hotel type development and oversupply of tourist accommodation. However little evidence of this is referenced or provided which would counter the information provided by the appellant in this regard, albeit itself limited. The planning report states that analysis of the supply of tourism accommodation is yet to be undertaken by the City Council (Objective CEE01 of the

development plan). In addition, the City Council does not provide parameters to guide assessment of overconcentration in this regard.

- 7.5. Conversely, the appellant states that whilst there may be over-proliferation of hotels (specifying a catchment of 500m) there are no tourist hostels of this type in that catchment, with 5 no. hostels in total within a 1.2 km radius.
- 7.6. In the absence of comprehensive information in this regard, my review of the public register indicates that 2 no. hostel developments have been granted planning permission Dublin 2 in the last five years (Refs. 2152/20, amended by 3762/21, and 3312/23), one of which I would consider is in the vicinity of the site (ie. Ref. 2152/20, 5 & 6 Camden Villas). Neither of these permissions appear to have been implemented. This review also indicates that outside the immediate Temple Bar area, there appears to be 2 no. hostels advertised and operating within Dublin 2, one of which ("The Times") I consider is in the vicinity of the site (ie. Camden Place).
- 7.7. Having regard to the foregoing, I do not consider there is robust evidence of an overconcentration or unacceptable levels of hostel development in the vicinity. In this context, and in the absence of information on levels of all types of visitor accommodation, and having regard to the relevant policy context, including the land use zoning objective for the area, I do not consider the proposed hostel use would have a significant detrimental impact on the wider objective to provide a rich and vibrant range of uses in the city centre. As such I do not consider there is sufficient basis to refuse permission for the proposed development on these grounds.
- 7.8. Having regard to the requirements of Policy CEE28 of the development plan in relation to the mix of uses and the levels and types of visitor accommodation in the vicinity and their impact on the objective to provide a rich and vibrant range of uses in the city centre, I do not consider that the proposed use in principle would have a significant detrimental impact in these regards or would be inconsistent with these aspects of Policy CEE28 of the City Development Plan.
- 7.9. I note that the reason for refusal states the proposal would be contrary to Section 15.14.1 of the development plan. That section of the plan relates specifically to the concentration of hotels and aparthotels. As such I do not consider that it is directly related to the proposed development, nor does it provide adequate grounds for refusal. Policy CEE28 'Visitor Accommodation' is relevant to the proposed tourist

hostel, and I consider that the application and main issues identified above should be assessed primarily in that context, as set out below.

Quality and design of accommodation

- 7.10. The planning authority decision to refuse permission states the proposal would result in a substandard development providing for poor quality accommodation in an inadequate and poorly designed building. Whilst hostel / tourist hostel is referenced in planning legislation and regulations and in the City Development Plan, there are no quantitative standards for tourist hostels to which the Board can have regard.
- 7.11. However, Policy CEE28 of the development plan does provide criteria for assessment of tourist hostel development, and requires that regard is had to the opportunity presented to provide high quality, designed for purpose spaces.
- 7.12. Whilst the proposal seeks to create a tourist hostel, I consider that the proximity of bedroom windows to adjoining walls, the resulting poor amenity of these rooms, the high proportion of rooms affected, the nature of the proposed external circulation, and the lack of details for multiple items, cumulatively do not provide for a high quality, designed for purpose tourist hostel development.
- 7.13. In addition, I do not consider that the proposal would provide high quality spaces having regard to the proximity of evening and night-time premises immediately adjacent to the north and south of the site. In this regard I consider the large proportion of bedroom windows in very close proximity to the boundaries with these premises would be contrary to establishing a high quality, designed for purpose tourist hostel development particularly on grounds of noise impacts. Further in this regard, I consider that the proximity of existing dwellings overlooking a number of the proposed bedrooms would provide for a poor level of occupant amenity and privacy.
- 7.14. Having regard to the foregoing, I consider the quality and design of accommodation proposed is poor. I do not consider that the proposal provides high quality, designed for purpose spaces consistent with Policy CEE28 'Visitor Accommodation' of the Dublin City Development Plan 2022-2028.

Impacts on amenity of property in the vicinity

- 7.15. The reason for refusal also states that the proposal would seriously injure the amenity of property in the vicinity. I note that the proposed first-floor rear windows

would generally be as per the existing windows, that is, between c.9m and c.13m from windows of existing residential units in No. 28 and 29 Wexford Street. A number of these existing dwellings would be directly overlooked by the proposed first-floor bedrooms. I consider that this would represent a significant detrimental impact on the residential amenity and privacy of those existing dwellings.

Proposed retention and completion

- 7.16. The application seeks (1) retention and completion of modifications to existing two storey building; (2) change of use from approved office / retail use to tourist hostel, and; (3) retention of single storey bike store / maintenance store. Drawings are submitted indicating the works to be retained and the works of modification, including for the building design and materials. All elements of the application are fundamentally interrelated such that I do not consider any part of the proposed development could be granted in isolation.
- 7.17. In relation to building design and materials, I do not consider that the design and finishes proposed provide an acceptable quality of design.

Related matters

Consideration of the proposed development and provision of information

- 7.18. I note that there is limited consideration of and a lack of information on key aspects of the proposed development including in relation to inward noise, light access, proposed hostel facilities, and heritage & conservation.

Conclusion

- 7.19. Having regard to the foregoing, whilst I do not consider that development plan Section 15.14.1, or the levels or concentration of visitor accommodation in the area provide robust grounds for refusal, I consider that the quality and design of accommodation, and the impact on the amenity of property in the vicinity do provide robust grounds for refusal. Having regard to the foregoing, in particular to the quality and design of development, and its relationship to adjacent development, I consider that the existing site significantly inhibits the potential to appropriately develop a tourist hostel as proposed. I do not consider that the proposed development, particularly having regard to the issues and limitations arising from the existing structure in its context, would be appropriate for tourist hostel use as proposed.

8.0 **Appropriate Assessment screening**

- 8.1. Having regard to the development proposed which comprises retention, completion and change of use of the existing buildings, and the nature of the receiving environment which is served by public mains drainage, I consider that no Appropriate Assessment issues arise, and I do not consider that the proposed development would be likely to have a significant effect, individually or in combination with other plans or projects, on any European site.

9.0 **Recommendation**

- 9.1. I recommend planning permission be **Refused** for the reasons and considerations below.

10.0 **Reasons and Considerations**

Having regard to the nature and location of the site and adjacent development, and the design and quality of the proposed tourist hostel, it is considered that the proposed development would not provide for high quality, designed for purpose tourist hostel development, and would be contrary to Objective CEE28 'Visitor Accommodation' of the Dublin City Council Development Plan 2022 - 2028, and would have a significant detrimental impact on the amenity and privacy of existing dwellings in the vicinity, and would, therefore, be contrary to the proper planning and sustainable development of the area.

-I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.-

D. Aspell
Inspector
4th October 2023