

Meriel
Huggard

Meriel Huggard
Liscombe House
Ashdale Road
Terenure
Dublin 6W
D6W V268

24rd May, 2025

The Secretary
An Bord Pleanála,
64 Marlborough St,
Rotunda,
Dublin 1,
D01 V902

Dear Sir / Madam,

**Re: Section 5 Referral - Park House, Ashdale Road, Dublin, D6W R270
Dublin City Council Planning Reg. Ref. 0447/24**

ABP Case Reference: RL29S.322400

Description: Whether the use of Park House is or is not development and whether it is or is not exempted development **and** whether the use of a residential building to house homeless persons is or is not development and whether it is or is not exempted development.

I wish to make an Observation on the following Case Reference:

RL29S. 322400, Section 5 Referral - Park House, Ashdale Road, Dublin, D6W R270.

I have paid the required fee of €50 when uploading this observation through the ABP portal.

My Observation:

1. Whether the use of Park House as a residential dwelling, constitutes exempted development or does not constitute exempt development?

I wish to strongly support the decision made by Dublin City Council that the use of Park House to house homeless persons is not exempted development for the following reasons:

- a. I have been a resident in the area for over 50 years and I can confirm that the eastern section of the building (known as Park House) was used continuously as a Crèche from 1992 to 2023. I live in the property adjacent to Park House and I can confirm that nobody has resided there since the closure of the crèche in 2023 and it is not a residential building. I strongly refute the Applicant's statement that there was a "period of dis-use" of the building as a crèche.
- b. I also suggest that as the Local Authority did not serve notice regarding the discontinuance of the use of the building as a crèche after 1997, it was not an

“unauthorised development” (as per the Planning and Development Act 2000: 46).

- c. The part of the building in residential use is that referred to as the “Western Section” (also known as 1 Ashdale Gardens), which was divided into five separate units with a entrance from Ashdale Gardens.
- d. My incontrovertible view, wholly agreeing with the determination by Dublin City Council, is that it would be a material change of use for the building to be used for residential purposes; in particular, as the building has been continuously used as a crèche for over 30 years. The re-establishment of the use of Park House for residential purpose must, thus, require planning permission.

2. Whether the use of a residential building, where care is not provided, to house homeless persons, constitutes exempt development or does not constitute exempt development.

I wish to strongly support the decision made by Dublin City Council that the proposed change of use of Park House to residential use for the purposes of housing homeless persons is not exempted development for the following reasons:

- a. I agree with Dublin City Council’s decision that the proposed change of use of this building to residential with the intent to house homeless persons constitutes development with different planning considerations. In particular, as Park House is a large vacant property and its sub-division into units constitutes significant development with concomitant issues associated with compliance with building regulations to ensure the safety, health and welfare of its proposed occupants.
- b. The information provided by the Applicants provide only scant detail on the proposed internal changes, which appear to be largely already progressed, to the building. In addition, the information they have provided to the local Residents’ Association (the Association of Residents’ of Terenure) suggested that specific end-use plans would not be confirmed “until the process is complete”.
- c. Given the specific end-use plans are unclear, a full planning application is essential to specify the intended use of the building (Hotel, Hostel, Bed&Breakfast, etc) and to ensure all building regulations are fully complied with and that the building is fit for the purpose the Applicants intend to use it for.
- d. I wish to also observe that the information supplied by the applicants does not provided sufficient reassurance that the planned development will not constitute an intensification of use of the building. I would note that Park House is located in a residential area with narrow streets and footpaths, terraced houses and on street parking. In particular, the requirement for planning permission would necessitate appropriate reference to civic life and the social and cultural character of the area, as well as its architectural and historical setting.
- e. I note that the local community have recently asked Dublin City Council to consider recording the building on the Record of Protected structures and I

am supportive on this request. I am very concerned by the ongoing work on the building Park House as I have observed the systematic removal and destruction of the historical features of the building.

In summary, I fully support Dublin City Council's decision that the use of Park House as a residential dwelling is development, as a material change of use has occurred. It is not exempted development, as the residential use in the eastern section of the building has been abandoned and the established use is a crèche/Montessori school, in which there is no exemption to change from this established use to a residential use.

I strongly agree with Dublin City Council that the use of the residential building, where care is not provided, to house homeless persons, is development as a material change of use has occurred and is not exempted development, as the change of use raises planning considerations that are materially different to planning considerations relating to the established use.

I implore the Board to support Dublin City Council's decision in order to ensure proper and sustainable development of the residential area, and of this property, which I have lived next door to for over 50 years.

Yours Sincerely,

Meriel Huggard

Meriel Huggard

