

DUBLIN CITY COUNCIL

Pre Part 8 Report

Proposal: Use of the former Parish Centre at 12-14 Carman's Hall, Dublin 8 as emergency accommodation for people experiencing homelessness for a period of 3 years.

Proposing Department:

Housing and Community Services

Location: The site comprises 12-14 Carman's Hall which is a two storey and part three storey detached building located along Carman's Hall, Dublin 8 (off Francis Street).

Scope of Development:

The Pre Part 8 submission is accompanied by a planning report setting out a rationale of the proposed works. Permission was granted, on 7th December 2020, for the retention of the existing use of the former Parish Centre at 12-14 Carman's Hall, Dublin 8 as emergency accommodation for people experiencing homelessness for a period of 12 months.

Dublin City Council's Housing and Community Services Department now proposes to seek permission, under the Part 8 procedure of the Planning and Development Regulations, 2001, as amended, to extend this use on a short-term basis up to 7th December 2024, as necessitated by the Covid-19 pandemic.

The pre part 8 submission includes;

- Complete set of dimensioned plans, sections and elevational drawings;
- Site layout plans/floor plans which encompass a greater area of the site context;
- Planning Report including history of the site
- Appropriate Assessment Stage 1 Screening Report
- A map of all homeless and other social support services within a 500 m radius of application site
- A statement on catchment area, i.e. whether proposal is to serve local or regional demand
- A statement regarding management of the service/facility

Relevant Policy from Development Plan 2016-2022

Under the Dublin City Development Plan 2016-2022, the site is zoned Objective Z1 'To protect, provide and improve residential amenities'.

Section 14.8.1 of the Development Plan states '*The vision for residential development in the city is one where a wide range of accommodation is available within sustainable communities where residents are within easy reach of services, open space and facilities, such as shops, education, leisure, community facilities and amenities, on foot and by public transport*'.

Section 5.5.11 of the development plan refers to Homeless Services and Section 16.12 refers to standards for Institutions / Hostels and Social Support Services. It states that an over-concentration of institutional hostel accommodation, homeless accommodation and social support institutions can potentially undermine the sustainability of a neighbourhood and so there must be an appropriate balance in the further provision of new developments and/or expansion of such existing uses in electoral wards which already accommodate a disproportionate quantum. Accordingly, there shall be an onus on all applicants to indicate that any proposal for homeless accommodation or support services will not result in an undue

concentration of such uses, nor undermine the existing local economy, the resident community, the residential amenity, or the regeneration of the area.

All such applications for such uses shall include the following: A map of all homeless and other social support services within a 500 m radius of application site. A statement on catchment area, i.e. whether proposal is to serve local or regional demand and a statement regarding management of the service/facility.

Other Planning Designations

The Liberties Greening Strategy (2014)

In 2014 Dublin City Council adopted The Liberties Greening Strategy which is a strategic document that builds on the policies and objectives of the Liberties Local Area Plan. It is a strategy that seeks to improve the recreational and amenity resources for the community, while focusing specifically on projects that have a realistic chance of being implemented in the medium term.

The Greening Strategy put forward a vision for a network of new urban parks, making accessible heritage green spaces and the refurbishment of existing green spaces and play areas.

Dublin City Council recognises that The Liberties area requires high quality open spaces which 'are parks and multi-functional green spaces that are visually attractive and provide multiple recreational opportunities' and the Strategy states 'visually attractive green spaces contribute positively to the image and identity of an area and are beneficial to the health and wellbeing of the residents'.

Thomas Street & Environs ACA (2009)

The site is located within the Thomas Street & Environs Architectural Conservation Area (ACA) which was adopted September 2009. Within the ACA document, Carman's Hall is acknowledged under 'Architectural Character' stating the building was 'designed by J.J. Robinson and R.C Keefe in the late 1930s with smooth rendered walls and curved lines typical of the International style of the early-mid 20th century'.

The character of the building is not being compromised to provide homeless accommodation. Prior to the conversion of the building to its current use, Carman's Hall was vacant and the building fabric deteriorating.

Planning History:

LAW3188/20: Permission granted for the retention of the existing use for a further period of 12 months of the former Parish Centre at 12-14 Carman's Hall, Dublin 8 as emergency accommodation for people experiencing homelessness, as necessitated by the Covid-19 pandemic.

EMA0001/18: Permission granted to change the use of the former Parish Centre, 12-14 Carman's Hall, Dublin 8 for a temporary period in order to provide supported temporary accommodation to 51 people experiencing homelessness.

Planning Assessment

The planning submission notes that the Covid-19 emergency has placed additional demands on residential accommodation space for homeless persons, due to the need to reduce the intensity of use of such facilities and to provide short term emergency accommodation across a wide number of units. Accordingly, it has been necessary to retain the STA (Supported Temporary Accommodation) use at Carman's Hall for another period. Given the continuing Covid-19 emergency and its uncertain outcome, including the possible emergence of more virulent strains of the virus, it is now proposed to extend the existing use for a further three years, up to 6th December 2024.

Principle of Development

The principle of homeless accommodation has already been established on the site under the previous Part 8 permission. Homeless accommodation in the form of either a building for health, safety and welfare of the public, or a hostel is permissible and open for consideration respectively within the Z1 Zoning which is applicable to the subject site. As such, it is considered that the homeless shelter is consistent with the zoning objective of the City Development Plan, which applies to the subject site and therefore does not materially contravene the City Development Plan.

Development Plan policy in relation to addressing homelessness is qualified by Policy QH30: *"To ensure that all proposals to provide or extend temporary homeless accommodation or support services shall be supported by information demonstrating that the proposal would not result in an undue concentration of such uses nor undermine the existing local economy, resident community or regeneration of an area. All such applications shall include: a map of all homeless services within a 500 metre radius of the application site, a statement on the catchment area identifying whether the proposal is to serve local or regional demand; and a statement regarding management of the service/facility."*

The pre part 8 submission includes the following information, as required under Section 16.12 of the Dublin City Development Plan 2016-2022.

- *A map of all homeless and other social support services within a 500 m radius of application site*
- *A statement on catchment area, i.e. whether proposal is to serve local or regional demand*
- *A statement regarding management of the service/facility*

The main area served by the Carman's Hall facility is the local City area, but the facility also serves the wider regional area in which the Dublin Region Homeless Executive (DRHE) is authorised to act. The DRHE is a shared service operation, under the aegis of Dublin City Council as the lead Statutory Authority in the Dublin Region in respect of the co-ordination of responses to homelessness. The DRHE has specific responsibilities for the operational co-ordination of the Homelessness Action Plan including regional service provision. The services provided at the Carman's Hall facility are an important contribution to implementation of the *Homeless Action Plan Framework for Dublin*, as supported by the Dublin City Development Plan.

The Carman's Hall facility will continue to be managed by the Simon Community, by way of contract with Dublin City Council. The Management Statement, of July 2021, by Dublin Simon Community sets out in detail how the facility is run as an STA for 51 homeless people, currently reduced to 32 persons as a precaution during the Covid-19 emergency. The residents can stay for up to six months and have 24 hour access to Simon staff. There is a team of staff and management on site 24 hours per day, seven days a week. The staff team numbers 3 key

workers, 15 support workers and a team of volunteers. Simon operate a “Good Neighbour Policy” whereby interactions with the local community are monitored and controlled.

Requirement of Appropriate Assessment (AA)

Under Article 6 (3) of the EU Habitats Directive and Regulation 30 of SI NO.94/1997 “European Communities (Natural Habitats) Regulations (1997) any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site must be subject to an Appropriate Assessment. This requirement is also detailed under Section 177 (U) of the Planning and Development Act 2000 (as amended). An Appropriate Assessment Screening Report accompanies the current proposal and concludes that there would be no significant negative effects on any Natura 2000 site as a result of the proposed development. As a result, a Stage 2 Appropriate Assessment would therefore not be required.

A statement on the requirement for an appropriate assessment is submitted in conjunction with the proposal and concludes that the proposed development would not be likely to have a significant effect, individually, or in combination with other plans or projects, on a European site.

The Planning Department, as the competent authority, has considered the screening report, has undertaken the Appropriate Assessment screening of the development and has determined that progression to Stage 2 of the Appropriate Assessment process (i.e. preparation of a Natura Impact Statement) is not considered necessary. It is not considered that the proposed development would be likely to have a significant effect, individually, or in combination with other plans or projects, on a European site.

Environmental Impact Assessment (EIA)

It is noted that screening for EIA has been carried out and it is not considered that the development would give rise to significant environmental impacts, by itself or cumulatively with other projects, and therefore it would not require to be subject to Environmental Impact Assessment.

Summary/ Conclusion

In conclusion, the Planning Department is satisfied that the Pre Part 8 Submission for use of the former Parish Centre at 12-14 Carman's Hall, Dublin 8 as emergency accommodation for people experiencing homelessness for a period of 3 years, is in conformity with the City Development Plan 2016-22 and that the Part 8 application can be lodged.

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16th August 2021

Rhona Naughton Senior Planner, 16th August 2021