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Job reference: 26-05/2p

Planning Statement in Support of Planning Application

**9A Abbey Street Lower
Dublin 1
D01 A0W2**

1.0 Introduction

Planning permission is sought to permit stays of less than 14 nights within the six existing residential apartments located on the first, second and third floors of No. 9A Abbey Street Lower, Dublin D01 A0W2.

Planning permission (Ref. 3516/22) was previously granted for the conversion of the upper floors from office accommodation to six residential apartments.

Condition number 10 of that permission requires a separate grant of planning permission before the apartments may be used for stays of less than 14 nights.

This application therefore seeks permission to remove that operational restriction.

No physical alterations to the building or the approved apartment layouts are proposed.

The apartments are operated as professionally managed serviced apartments.

They comprise self-contained residential apartments managed by a single professional operator and are occupied primarily by business visitors and other temporary residents requiring apartment accommodation in Dublin.

As demonstrated in this Planning Statement, permitting stays of less than 14 nights would not result in the loss of long-term residential accommodation.

This is because the apartments have never formed part of Dublin's long-term residential housing stock.

Rather, the proposal would enable an existing residential development to respond more effectively to demonstrated demand while making more efficient use of completed accommodation in a highly sustainable city centre location.

1.1 Location

The property is located on Abbey Street Lower, Dublin 1.



Site location

Source: Google Maps

The site occupies a highly sustainable location with excellent public transport connections.

Luas, Dublin Bus services and Connolly Station are all within easy walking distance.

The property is also close to major employment centres, retail and leisure facilities, cultural attractions and a wide range of other city-centre amenities.

It is particularly well suited to professionals travelling to Dublin on business assignments.

That is due to it being within a 30 minute walk of many technology, finance and consulting offices.

Table 1 – Walking times to selected major employers

Organisation	Sector	Walking Time
Workday	Technology	5 mins
Wells Fargo	Financial Services	9 mins
Klaviyo	Technology	11 mins
Morgan Stanley	Financial Services	11 mins
Northern Trust	Financial Services	11 mins
Citi	Financial Services	13 mins
HubSpot	Technology	14 mins
Barclays	Financial Services	15 mins
PwC	Professional Services	20 mins
TikTok	Technology	21 mins
Deutsche Bank	Financial Services	22 mins
Goldman Sachs	Financial Services	22 mins
Salesforce	Technology	22 mins
Accenture	Professional Services	23 mins
Bank of America	Financial Services	27 mins
EY	Professional Services	27 mins
JP Morgan	Financial Services	27 mins
KPMG	Professional Services	27 mins
Google (Barrow Street)	Technology	29 mins
Deloitte	Professional Services	29 mins
Amazon (St Kevin's)	Technology	30 mins

Source: Google Maps

1.2 Existing Building

The property comprises a mid-terrace building with a basement and ground-floor commercial unit, together with three upper floors containing six apartments.

The building was constructed circa 1920.

Although it is not a protected structure, it forms part of an early Twentieth Century terrace and retains its original architectural character and appearance.

In recent years, the entire building has been comprehensively refurbished and

upgraded in a manner that respects its historic character and fabric.

In turn, that respects the architectural character and special interest of the O'Connell Street Architectural Conservation Area - all while delivering a contemporary mixed-use scheme that reflects the evolving role of Abbey Street Lower within Dublin city centre.

Planning permission was previously granted under Planning Ref. 3516/22 for the conversion of the upper floors from vacant office accommodation to six residential apartments.

The apartment works were completed in March 2025.

The apartments consist of:

- Three studios measuring approximately 37 square meters.
- Three one-bedroom apartments measuring approximately 50 square meters.

Apartments aside, the landlord has sought to activate the street by improving the ground floor retail experience.

On that note, the retail unit has been upgraded to a very high standard and works have included the installation of a new steel shopfront designed by architect Denis Byrne and built by Lambstongue, ensuring historically appropriate finishes & detailing.

The retail unit is now tenanted by Tang cafe which has become a popular daytime and nighttime destination on Abbey Street Lower.

The landlord has undertaken a similar retail upgrade to their building next door at 9B Abbey Street Lower.

The landlord is also planning a similar upgrade next door at 7–8 Abbey Street Lower.

2.0 Planning History

Planning permission file ref: 3516/22 was granted on 16th June 2022 and was subject to 14 conditions which could be described as standard in nature.

Condition number 10 noted that:

“The development shall not be used for short term residential letting without prior grant of planning permission.”

The applicants now seek planning permission for the use of the residential units as professionally managed serviced apartments for stays of less than 14 nights, rather than as unregulated short-term tourist lettings.

3.0 Planning Context

The site is zoned Z5: City Centre which aims to:

“consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity”

Permitted uses within this zoning include inter alia bed and breakfast, guesthouse, home-based economic activity, hostel (tourist), hotel, live-work units, student accommodation and residential, with uses ‘open for consideration’ including Build to Rent residential.

At its core, and as outlined in the Dublin City Development Plan 2022–2028, the purpose of the Z5 Zoning is to:

“sustain life within the centre of the city through intensive mixed-use development..... to provide a dynamic mix of uses which interact with each other, help create a sense of community, and which sustain the vitality of the inner city both by day and night.”

The Development Plan also recognises *“the growing residential communities in the city centre”*.

And that *“a mix of uses should occur both vertically through the floors of buildings as well as horizontally along the street frontage. A general mix of uses, e.g. retail, commercial, residential, will be desirable throughout the area and active, vibrant ground floor uses promoted.”*

The proposed use is permissible under the Dublin City Development Plan and is consistent with the Z5 zoning of the site.

4.0 Existing Use

Since August 2025, the dwellings have been operated as professionally managed serviced apartments. They have been operated by the international serviced apartment operator, Urban Rest. The target customers have been business travellers visiting Dublin for work purposes.

Recent guests have included people working for:

- Google
- Salesforce
- BNP Paribas
- EssilorLuxottica
- ING
- Fidelity Investments
- BMO Capital Markets
- Klaviyo

- Twilio

For the first three months of operation, stays of under 14 nights were inadvertently offered to guests.

This was due to the overseas-based landlord relying on (erroneous) advice published on the Citizens Information website.

The website contains a page entitled '**Renting your property for short-term lets**'¹.

That page contains a sub-headline reading '**Exemptions from the planning permission requirements**'.

Under that sub-headline, the text reads: *'You do not have to apply for planning permission for your short-term let if:'*

The subsequent list of exemptions includes:

'Your property is used for corporate or executive lets. For example, lettings provided for people coming to Ireland under employment contracts.'

The landlord considered that the apartments fell within what the Citizens Information website described as 'corporate or executive lets'.

However, subsequent communications with the Dublin City Council's Planning Enforcement/Short Term Letting department confirmed that the advice on Citizens Information is, in fact, wrong.

And that only stays of 14 nights or more are allowed in the apartments under the existing planning permission.

On that note, the property has operated in compliance with the 14 night minimum stay requirement since October 2025.

This confusion over the minimum stay requirement has given rise to useful data.

That data reveals strong demand for professionally managed short-term corporate lets for stays of less than 14 nights at this location.

During the initial three months of operation, when short stays were accommodated, average occupancy reached 74% (and 78% next door at 9B Abbey Street Lower).

But since the introduction of the requirement that guests stay for a minimum of 14 nights, average occupancy has fallen to 23% (and 11% at 9B Abbey Street Lower).

As a result, the upper floors of the property are now significantly underutilised.

5.0 Operational Experience

Since the dwellings began operating as professionally managed serviced apartments, there have been no complaints from neighbouring occupiers or other stakeholders regarding their operation.

Nor has the use given rise to any known issues relating to noise, anti-social behaviour, waste management, servicing or the amenity of neighbouring properties.

The apartments are professionally managed by a single operator responsible for bookings, guest communications, housekeeping and compliance with house rules.

This centralised management distinguishes the development from unregulated short-term letting and ensures consistent operational standards.

The experience of operating the apartments demonstrates that professionally managed serviced accommodation can successfully accommodate shorter-stay business visitors within a mixed-use city centre environment without giving rise to adverse impacts on neighbouring occupiers or the surrounding area.

6.0 No Loss of Long-Term Residential Housing Stock

The proposal to allow stays of less than 14 nights would not result in the loss of long-term residential housing stock.

That is because, although planning permission was granted for residential use, the apartments have never formed part of Dublin's long-term residential housing stock.

This is demonstrated by the following:

1. They have never been inhabited by an owner-occupier.
2. They have never been rented to long-term tenants.
3. They have never been registered with the Residential Tenancies Board.

Since their completion, they have operated solely as professionally managed serviced apartments.

Accordingly, permitting stays of less than 14 nights would alter only the operational parameters of the existing residential use, while leaving Dublin's long-term residential housing stock unchanged.

Meanwhile, it would enable completed residential accommodation to be used more efficiently in response to demonstrated demand.

7.0 Using City Centre Accommodation More Efficiently

The operation of the apartments has provided clear evidence of strong demand for professionally managed serviced apartments for business visitors staying for less than 14 nights.

This is consistent with broader market evidence.

According to the Irish Tourism Industry Confederation's 2025 report, *Behind the Data: A Dive into Annual Irish Tourism*, Central Statistics Office tourism data shows business visitors to Ireland stayed for an average of 5.2 nights during 2024 ².

The current 14-night minimum stay requirement therefore excludes the majority of international business travellers from staying in the apartments.

The resulting underutilisation is particularly striking when viewed against prevailing market conditions.

According to Savills' *Market in Minutes: Ireland & Scotland Hotel Markets – June 2026* report, Dublin hotels achieved average occupancy of 84.1% during 2025 and experienced 146 nights during which hotel occupancy exceeded 90%.

Savills describes these as "compression nights", reflecting periods of exceptionally strong demand when finding suitable hotel accommodation becomes increasingly difficult ³.

These figures demonstrate sustained demand for short-stay accommodation in Dublin. Yet, because of the 14-night minimum stay requirement, the subject apartments were unable to accommodate many business travellers requiring shorter stays.

Allowing stays of less than 14 nights would enable the completed development to respond more effectively to demonstrated market demand without any increase in floorspace, building height or physical development. It would also make more efficient use of completed accommodation in a highly sustainable city centre location.

8.0 Assessment Against the Dublin City Development Plan 2022–2028

The preceding sections describe the existing use of the property and the operational evidence supporting this application.

The proposal is assessed below against the relevant objectives and policies of the Dublin City Development Plan 2022–2028.

8.1 Compact City

The strategic approach of the Dublin City Development Plan is to promote:

"...the consolidation of the city, maximising efficient use of land..."

Section 4 of the Development Plan expands upon this objective by promoting:

"...the creation of a consolidated city... where underutilised sites and buildings are actively reused and intensified..."

The operational evidence presented in this Planning Statement demonstrates that the current 14-night minimum stay requirement has resulted in the completed apartments being significantly underutilised despite strong demand from business visitors requiring shorter stays.

Permitting stays of less than 14 nights would remove this operational constraint without any increase in floorspace, building height or physical development.

The proposal therefore directly supports the Development Plan's objective of making more efficient use of existing city centre development.

8.2 Z5 City Centre

The site is located within lands zoned Z5.

The 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."

The Development Plan explains that the purpose of the Z5 zoning is:

"...to provide a dynamic mix of uses which interact with each other, help create a sense of community, and which sustain the vitality of the inner city both by day and night."

The proposal directly advances these objectives.

It retains the approved residential use of the upper floors while enabling a completed mixed-use development to respond more effectively to established demand from business visitors.

By increasing the utilisation of existing accommodation, the proposal will contribute to the vitality of Abbey Street Lower throughout the year without altering the physical character of the building.

8.3 Economic Competitiveness

Chapter 6 of the Development Plan recognises Dublin as the State's principal economic engine.

Policy CEE1 seeks:

"To promote and enhance the role of Dublin as the national economic engine and driver of economic recovery and growth, with the city centre as its core economic generator."

Policy CEE26(ii) seeks:

"To promote and enhance Dublin as a world class tourist destination for leisure, culture, business and student visitors and to promote Dublin as a setting for conventions and cultural events."

The proposal supports these objectives by broadening the range of professionally managed serviced apartments available to business visitors.

Earlier sections demonstrate that the overwhelming majority of overseas business visitors stay for substantially less than 14 nights.

Permitting shorter stays would therefore better align the operation of the apartments with the accommodation requirements of modern international business travel.

8.4 Visitor Accommodation

Policy CEE28 sets out the following assessment criteria for visitor accommodation:

- 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; and
- 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.

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8.5 Residential Amenity

The operational experience described in Section 5 demonstrates that professionally managed serviced apartments are compatible with this mixed-use city centre location.

Since commencing operation, no complaints have been received regarding noise, anti-social behaviour, waste management, servicing arrangements or the amenity of neighbouring occupiers.

The apartments continue to be managed by a single professional operator responsible for bookings, guest communications, housekeeping, maintenance and compliance with house rules.

Accordingly, the operational evidence demonstrates that permitting stays of less than 14 nights would not adversely affect the amenity of neighbouring occupiers and would remain consistent with the wider objectives of the Dublin City Development Plan.

8.6 Supporting Dublin's Economic and Regeneration Objectives

The completed refurbishment of the building has transformed vacant upper floors into high-quality residential accommodation while improving the appearance and functionality of the ground floor commercial unit.

This application seeks to build upon that successful regeneration project by enabling the completed apartments to respond more effectively to demonstrated demand.

As described in Section 4, the apartments have accommodated employees of a wide range of multinational companies, demonstrating clear demand in this location for professionally managed serviced apartment accommodation from business visitors to Dublin.

Permitting stays of less than 14 nights will enable this existing development to continue supporting Dublin's role as an internationally competitive business location.

The proposal will also contribute to the continued regeneration of the North Inner City.

Increased occupation of the apartments will generate additional activity throughout the year, supporting cafés, restaurants, retailers and cultural venues in the immediate vicinity.

This reflects the Development Plan's vision of a city centre with:
"...a dynamic mix of uses..."

that:

"...sustain[s] the vitality of the inner city both by day and night."

The apartments occupy an exceptional location immediately opposite the Abbey Theatre, adjacent to the future home of Irish National Opera and within a short walk of the Gate Theatre, the Academy, the Savoy Cinema and the Hugh Lane Gallery.

By increasing occupation within this cultural quarter, the proposal will make a modest but meaningful contribution to the continued regeneration and vitality of Abbey Street Lower and surrounding streets.

9.0 Distinction from Short-Term Tourist Accommodation

The Development Plan contains a clear policy concern regarding dedicated short-term tourist rental accommodation because of its impact on housing supply.

However, the proposed development is materially different from tourist accommodation for the following reasons:

- Occupation is primarily linked to employment, relocation, academic or professional purposes
- The accommodation as provided remains residential in nature (with no material changes proposed to that already constructed)
- The proposal will not operate as holiday accommodation in the normal or traditional sense
- The property will be professionally managed serviced apartments with occupancy controls and management procedures, as evidenced by the supporting documentation and the track record of the applicants
- The use generates significantly lower turnover and activity levels than typical or normal tourist accommodation.

Accordingly, the concerns underlying policies relating to short-term tourist rentals do not arise in this case.

Appendix A contains correspondence from Urban Rest describing the operational constraints created by the current 14-night minimum stay requirement and the effect those constraints have had on the viability of the apartments.

10.0 Strategic Planning Balance

In assessing the application, the Planning Authority is requested to recognise the distinction between tourist accommodation and professionally managed serviced apartment accommodation for business visitors.

The proposal:

- Retains the residential function of the property
- Supports Dublin's economic and employment objectives
- Provides for a recognised accommodation need of temporary workers and relocating professionals
- Promotes efficient use of existing housing stock
- Supports sustainable urban development and compact growth principles
- Protects residential amenity
- Does not create dedicated tourist accommodation

For these reasons, the proposal represents an appropriate and sustainable form of residential accommodation that accords with the broader objectives of the Dublin City Development Plan 2022–2028.

It is therefore respectfully submitted that the proposed change of use is consistent with the proper planning and sustainable development of the area and that planning permission should be granted.

11.0 Conclusion

This application seeks permission to remove an operational restriction that currently prevents an existing professionally managed residential development from responding efficiently to demonstrated market demand.

The proposal does not involve any physical alteration to the building and would not result in the loss of long-term residential accommodation.

Instead, it would enable completed city centre accommodation to be used more efficiently, broaden the range of professionally managed accommodation available to business visitors and support the compact city, economic competitiveness and regeneration objectives of the Dublin City Development Plan.

Operational experience demonstrates that the apartments can successfully accommodate shorter-stay business visitors without adverse impacts upon neighbouring occupiers or the surrounding area.

The development clearly complies with and is supported by the relevant National, Regional and Local Policies and Guidelines and has been conceived to a high standard in all respects, including the amenity of the adjoining properties, and will contribute significantly to the location and the surrounding urban context.

Furthermore, as has been clearly demonstrated, the development does not cause any negative impact on the neighbouring properties.

For these reasons, it is respectfully submitted that the proposal represents proper planning and sustainable development, accords with the objectives and policies of the Dublin City Development Plan 2022–2028 and that planning permission should be granted.



Patrick M. Kerr

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References

1. Citizens Information (2026). Renting your property for short-term lets. Available at: <https://www.citizensinformation.ie/en/housing/owning-a-home/home-owners/renting-your-property-for-shortterm-lets/> (Accessed: 6 August 2026)
2. Irish Tourism Industry Confederation (2025). Behind the Data: A Dive into Annual Irish Tourism Statistics. Available at: <https://www.itic.ie/btd2024/>
3. Savills (2026). Market in Minutes: Ireland & Scotland Hotel Markets – June 2026. Savills Research. Available at: https://www.savills.com/research_articles/255800/392348-0
4. Dublin City Council (2026). Deputy Planning Officer's Report. Planning Application WEB5551/25. Proposed 44-bedroom aparthotel, 14–17 O'Connell Street Lower, Dublin 1. Dated 17 February 2026
5. Dublin City Council (2023). Deputy Planning Officer's Report. Planning Application 3781/23. Proposed 125-bedroom tourist hostel, 6–12 Sackville Place and 107A Marlborough Street, Dublin 1. Dated 8 September 2023

RECEIVED: 13/08/2026

Appendix A:

Correspondence from URBAN REST

To Whom It May Concern,

Re: Letter of Support for the Change of Use Application – Lower Abbey Street, Dublin

I am writing on behalf of Urban Rest in support of the application to change the use of the Lower Abbey Street property from residential to commercial accommodation.

Urban Rest is a corporate accommodation provider operating across Australia, New Zealand, the United Kingdom and Ireland. Our business is primarily focused on servicing business travellers, with approximately 70% of our revenue generated through corporate channels. We cater to a broad range of business travel requirements, from transient stays of 2–5 nights through to medium and longer-term accommodation for project teams, relocations and extended assignments.

Urban Rest has operated the Lower Abbey Street asset over the past 12 months (July 2025 – July 2026). During this period, we have observed consistent demand from both corporate and leisure guests, with stay patterns demonstrating that the property is well suited to a range of accommodation requirements.

Our booking data shows demand generated through a combination of:

- Corporate clients travelling for business purposes.
- Corporate housing partners supporting employee relocation programmes, including bookings such as a 59-night stay from Oasis Corporate Housing.
- Online travel agency (OTA) channels, which generate shorter-duration stays and help maximise occupancy between longer corporate bookings.

The property's location is a significant contributor to this demand. Situated within walking distance of the IFSC (Irish Financial Services Centre) and with excellent connectivity via the LUAS and DART networks, the asset is particularly well positioned to accommodate visitors travelling to Dublin for business, whether for a few nights or for extended project work.

From an operational perspective, we have found that the property requires occupancy levels in excess of approximately 85% to operate sustainably, reflecting the tight margins within the serviced accommodation and hospitality sector. Achieving this level of occupancy is dependent on maintaining a mix of booking lengths. While extended corporate stays form an important part of demand, shorter stays—particularly those under 14 nights—are essential for filling gaps between longer bookings and maintaining commercially viable occupancy throughout the year.

Based on our operational experience, restricting the property to longer residential-style occupancy would significantly reduce its ability to meet the demonstrated demand from business travellers and would adversely impact the commercial viability of the asset. In contrast, operating the property as commercial accommodation enables it to serve a broader spectrum of visitors to Dublin while making effective use of its central location and transport connectivity.

In our experience, Lower Abbey Street is well suited to commercial accommodation, particularly for corporate travellers and business visitors requiring flexible, high-quality accommodation in Dublin city centre. We therefore support the proposed change of use and believe it reflects both the operational realities of the asset and the nature of the demand it serves.

Should you require any further information regarding our experience operating the property, we would be pleased to provide it.

Yours faithfully,

Izabela Szumierz
Managing Director – Europe
Urban Rest