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PLANNING REPORT

INCLUDING:

Statement Of Consistency

Community and Social Infrastructure Audit

Response to LRD Opinion

FOR A PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) COMPRISING STUDENT ACCOMMODATION AT 21-23 BLACKPITTS, DUBLIN 8.

Prepared by MCG Planning
On behalf of Blackpitts Residence Unlimited Company
JULY 2025

Contents

Introduction

McGill Planning Limited, 9 Pembroke Street Upper, Dublin 2 is instructed by the applicant Blackpitts Residence Unlimited Company, 12 Merrion Square, Dublin, to submit this Large-Scale Residential Development LRD application under Section 32D of the Planning and Development (Amendment)(Large-scale Residential Development) Act, 2021.

The applicant Blackpitts Residence Unlimited Company has employed a Design Team for this site to deliver the highest quality development in a timely manner and in line with the Development Plan of Dublin City Council.

The application has been prepared by a multidisciplinary team. This includes Horan Rainsford Architects, JBA Consulting Engineers and Scientists Limited, Passive Dynamics, JJ Campbell & Associates Civil and Structural Engineers, Atkins Réalis Consulting Engineers, Altemar Environmental Consultants, ModelWorks, Ayesa Engineering, Archaeology & Built Heritage Ltd, Traynor Environmental, Dynamic Design & Global Apartment Advisors.

Development Statistics

Development	Site Statistics
Site Area	0.24ha Gross 0.19ha Net
Unit Mix	217 student bed spaces (209 single rooms and 4 twin rooms, 213no. rooms in total)
Restaurant/Café	c. 144.5 sq.m at ground floor level
Residential Amenity Space	- Outdoor Communal Space: 673 sqm - Indoor Communal Space: 512 sqm (comprising parcel room, reception/common area, concierge desk, library/study room, multiuse rooms, laundry room, cinema room, and gym) The overall quantum communal amenity space provided is 1185 sqm, exceeding the 1065 sqm required.
Density (net)	c.285uph (based on the Compact Settlement Guidelines advice *"when calculating net densities for shared accommodation, such as student housing, four bed spaces equivalent of one dwelling.")*
Plot Ratio (net)	3.95:1
Site Coverage (net)	59%
Building Height	Up to 6 storeys over basement
Cycle Parking	272 no. cycle parking spaces comprising: - 160 long-stay stacked spaces in basement - 78 Sheffield stands (including 14 for staff) in basement - 12 cargo/oversized spaces in basement - 22 visitor Sheffield stands at surface level * Of which 5% is non-standard bike parking equivalent to 12 parking spaces
Car Parking	1 no. accessible on-street parking space located at ground level and 1no. Loading Bay.

Table 1: Table Statistics

Site Location and Description

Figure 1: Approximate Site Location. Please note the red line is shown for indicative purposes only. Please refer to the architect's drawings for an accurate red line boundary

The subject site is located west of Clanbrassil Street in the Blackpitts area of the southwest inner city. Blackpitts is a relatively wide street with footpaths on both sides and on-street parallel parking along the site boundary and also along Donovan Lane to the north.

Blackpitts is located within the Inner City next to the City Centre. St. Stephen's Green is c.10 mins walk from the site. The site is within walking distance of a range of public transport options and social infrastructure. The site itself contains 3 commercial properties within a single, 2 storey block, well set back from the street and with surface parking and service areas. The boundary treatment along Blackpitts and Donovan Lane comprises low rubble wall with metal railings.

The building, service yard, and boundary fence present are visually intrusive and unattractive appearance. They are considered to undermine the character and visual quality of the surrounding streetscape and broader townscape. The site offers no active frontage to either street, lacking any meaningful entrances or engaging uses, and fails to contribute to passive surveillance of the public realm, thereby diminishing local amenity.

Adjoining properties along Blackpitts are similarly 2-3 storeys in height with apartment blocks to the east along Clanbrassil Street rising to 4-5 storeys. A traditional 2 storey residential area to the west

comprising Greenville Parade, St. John's Street and Hammond Street is also set back from Blackpitts. Further north towards Newmarket Square building height increases within a number of recent developments including The Tannery and New Mill student residences and Aloft Hotel extending up to 8 storeys.

Blackpitts is a mixed-use area with apartments and own door housing sitting alongside commercial/office uses and educational uses. At 25-26 Blackpitts to the north is also the Blackpitts Mosque within a 2-storey building but with planning permission recently granted for a mixed use redevelopment comprising a new mosque and apartments at upper levels up to 7 storeys.

In terms of topography the site is generally quite flat, resting at similar levels to adjoining property and streets. Given that this subject site is an archetypal brownfield site, comprising existing commercial unit and hardstanding, the site in its current form lacks any green infrastructure of significance.

There are no protected structures on site . The site is not located within an Architectural Conservation Area (ACA) nor is it subject to any protected views or prospects. The site however, is just within the Zone of Archaeological Constraint for the Recorded Monument DU018-020 (Dublin City) which is listed on the Record of Monuments and Places (RMP).

Figure 2: View of Existing Building from Blackpitts

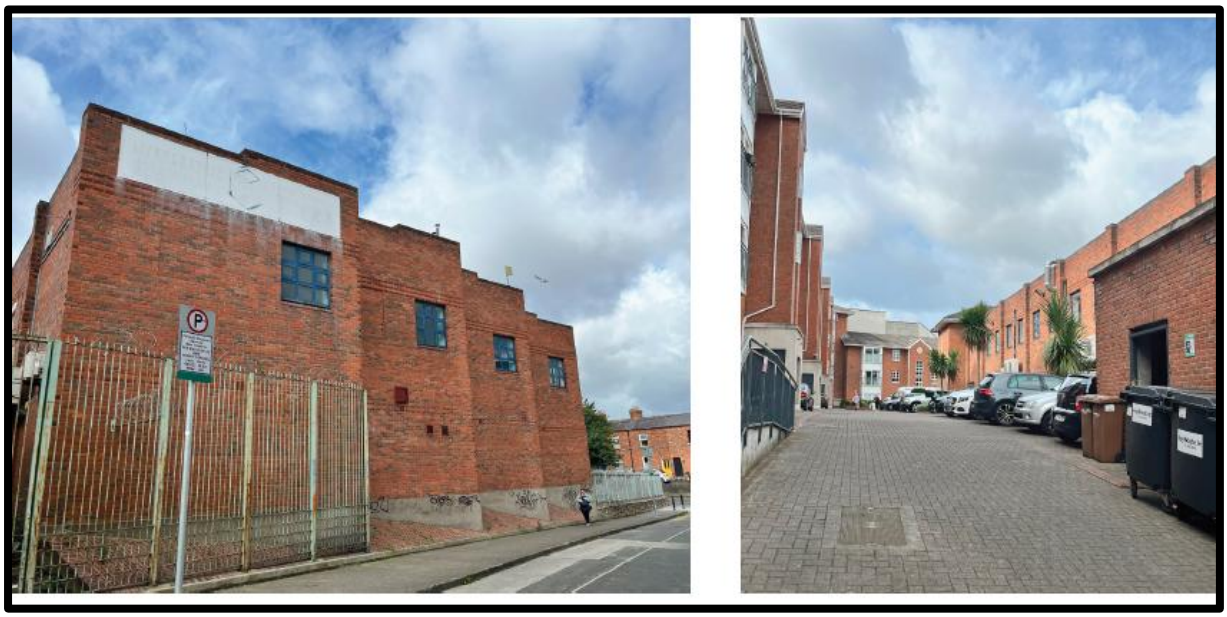


Figure 3: View of existing building from Donovan Lane (left) & View of rear elevation facing onto neighbouring residential block (right)

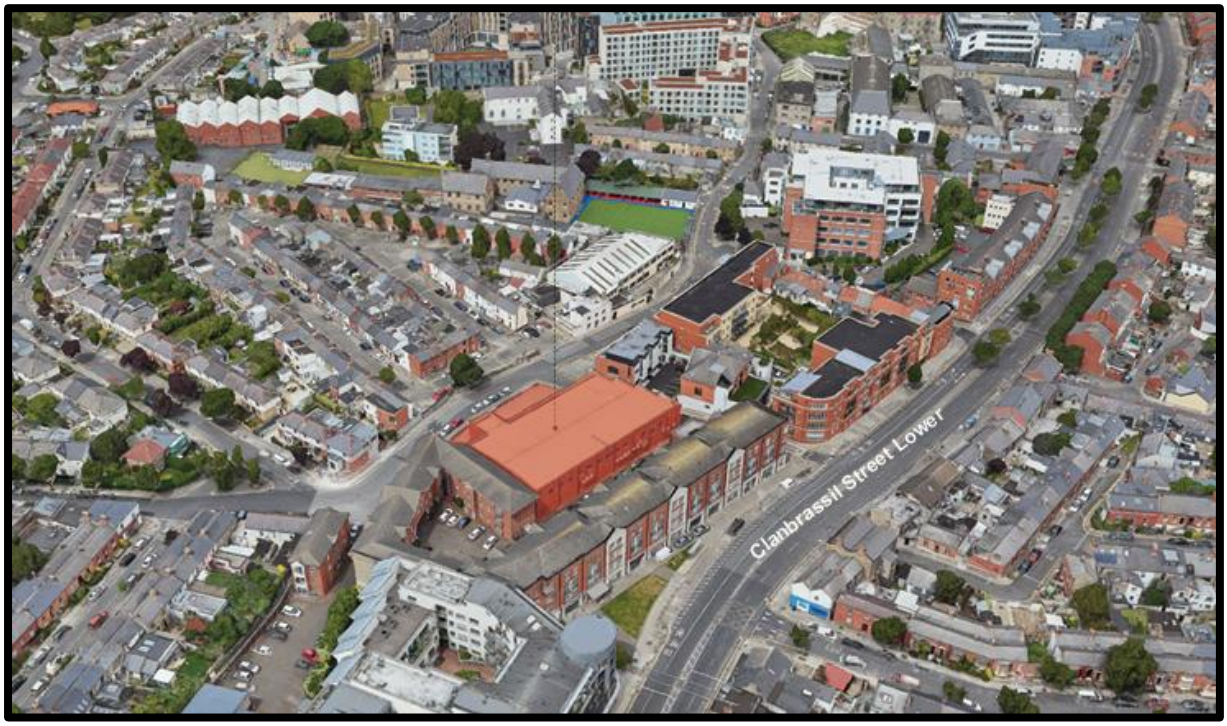


Figure 4: View of the building looking North along Clanbrassil Street Lower

Site Context

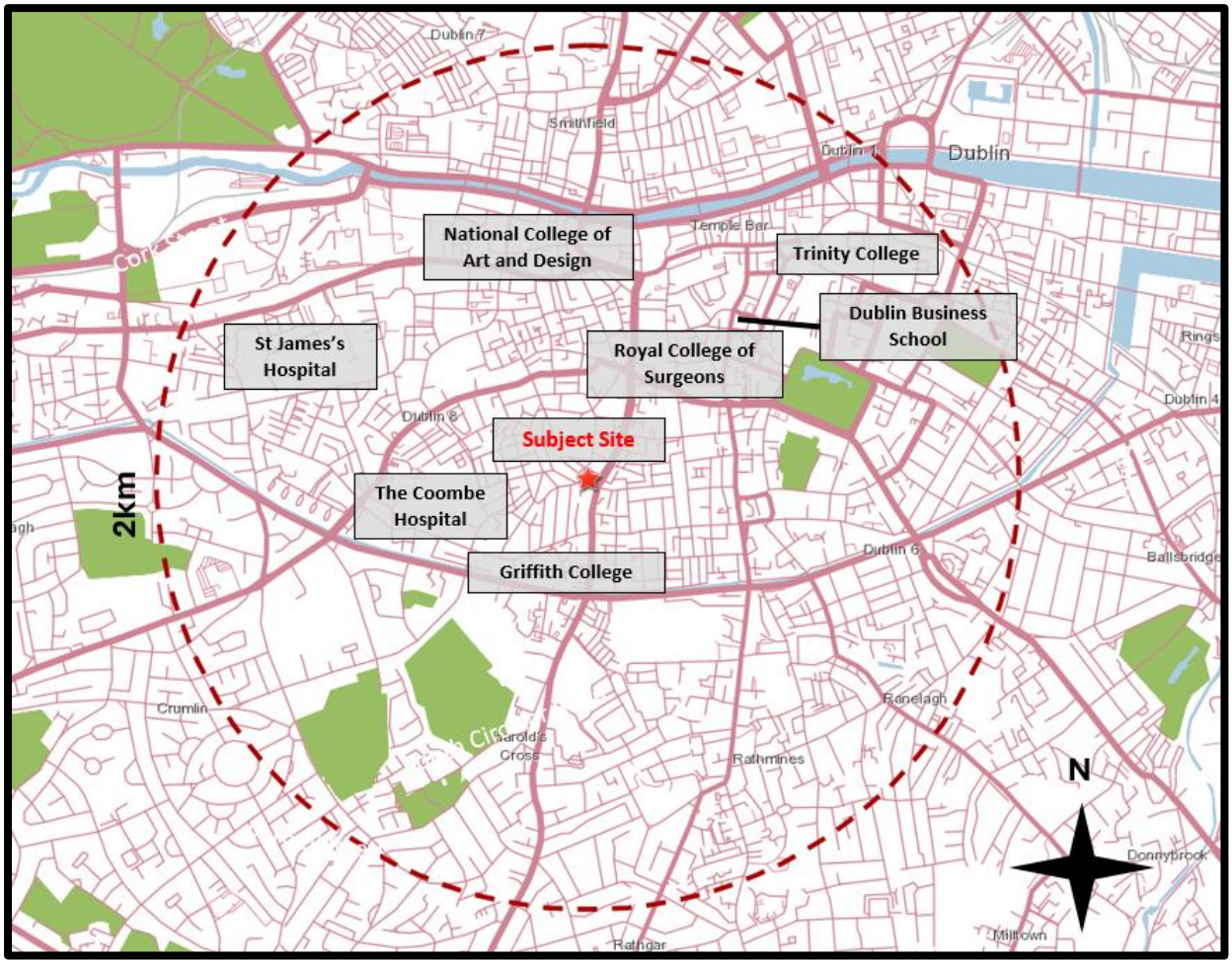


Figure 5: Site Location in Relation to Institutions in the Vicinity

The site is located within a 10-minute cycle of Trinity College Dublin, National College of Art and Design, Royal College of Surgeons, Griffith College, and Dublin Business School which together had a total combined enrolment of 37,635 No. third-level students in 2023. Moreover, it is within a 15-minute cycle of University College Dublin, TUD Grangegorman and NCI Ireland which increase the total combined enrolment to 82,671 No. third-level students. The subject site presents an opportunity to contribute to alleviating the prevailing shortage of suitable student accommodation in Dublin on appropriately zoned lands (as recognised within the National Student Accommodation Strategy, and by Dublin City Council within the CDP). This area contains a strong mix of land-uses with a balance of residential, office, and retail buildings, as well as community and amenity areas within a 1km radius of the site.

The area is currently undergoing significant regeneration with new developments rising to 8 stories nearby. The area is considered to have a strong sense of community, and is within easy reach of the city centre, just 7 minutes to Camden Street and a nearby diverse range of shops, bars and cafes. The property is zoned Objective Zone Z1: Sustainable Residential Neighbourhoods "To protect, provide and improve residential amenities" in the Dublin City Development Plan 2022-2028.

Student Accommodation Concentration

As part of this LRD application, McGill Planning have carried Student Accommodation Concentration Report. The purpose of this report is to provide an assessment of concentration of student development in the local surrounding area in the context of the proposed development.

The subject site presents an opportunity to contribute to alleviating the prevailing shortage of suitable student accommodation in Dublin on appropriately zoned lands (as recognised within the National Student Accommodation Strategy, and by Dublin City Council within the CDP). This area contains a strong mix of land-uses with a balance of residential, office, and retail buildings, as well as community and amenity areas within a 1km radius of the site. It should be noted that nearly one third (c. 28.0%) of all land area within the 1 km catchment is occupied by low density single family dwellings.

The proposed development is located in close proximity to 8 No. of the largest universities and private education institutions in the Country and considered to be highly suitable for student accommodation use. The site is located within a 15-minute cycle of Trinity College Dublin, National College of Art and Design, Royal College of Surgeons, Griffith College, Dublin Business School, University College Dublin, TUD Grangegorman and NCI Ireland which had a total combined enrolment of 82,671 No. third-level students in 2023.

In summary the report demonstrates that there is not an overconcentration of student accommodation or student population in the local area. There is a total of 3,699 No. student accommodation bedspaces currently in operation (April 2024). No further student bedspaces are currently permitted or under construction within the 1 km radius. Some 1,918 No. of these bedspaces (51.9%) have come onstream since 2022.

Description	Ref.	Value	Method
2022 total Census population for the 1km catchment	a	41,168	Census 2022
2022 student Census population for the 1km catchment (Aged 15+ classified Student)	b	5,203	Census 2022
2022 Student Census population as a percentage of total population (%)	**c**	**12.6%**	**b / a * 100 = c**
Number of additional student bed spaces completed/occupied since 2022	d	1,918	Author
Proposed number of student bed spaces in pipeline 2024 (undeveloped)	e	0	Author
Number of units in Blackpitts PBSA proposal	f	217	Author
Total projected new student population	**g**	**2,135**	**d + e + f = g**
Number of additional general housing units completed or in pipeline after 2022	h	2,415	Author
Local household size for the 1km catchment, 2022	i	2.16	Census 2022
Total number of additional projected general housing occupants	j	**5,216**	g * i = j
Total number of additional projected general housing occupants (Aged 15+ classified Student)	k	**658**	j * c = k
Future Population (Census 2022 + All Completed/Consented)	l	48,519	a + g + j = l
Future student Census population for the 1km catchment (Aged 15+ classified Student)	m	7,997	b + g + k = m
Total proposed student population as a percentage of the overall total population (%)	**n**	16.5%	

Table 2: Concentration calculation table for 1 km catchment area adapted from Edinburgh Model (Source: MCG Planning).

Figure 6: Existing PBSA within 1km of subject site.

Considering the existing and proposed PBSA developments within the 1 km catchment, alongside the granted large scale residential developments within the 1 km catchment, and the proposed PBSA development (217 no. bed spaces), the total student population would represent c. 16.5% of the total population when fully occupied (an increase from 12.6% of in 2022). This calculation was derived using the 'PBSA concentration calculation table' (Table 1), as informed by international best practice in Edinburgh, ref. Edinburgh City Council (2015) '*Edinburgh Planning Guidance: Student Housing*', to quantify student concentration/ overconcentration, and ensure sustainable PBSA provision around the city. It is submitted in this report that these figures fall well below a threshold of 30% of the total population to describe overconcentration. On this basis, there is unlikely to be any significant relative increase in the number of students living in the area.

Please refer to the Student Accommodation Concentration Report for full details.

Accessibility

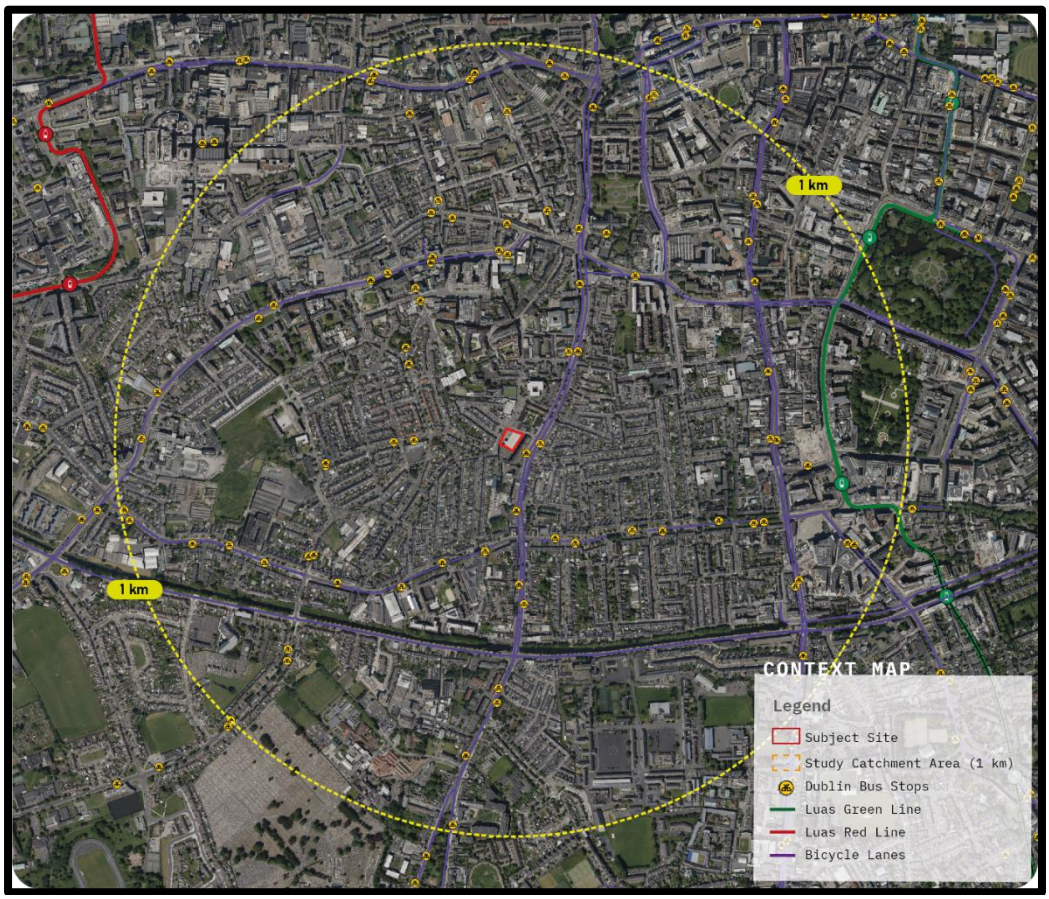


Figure 7: Study Area, with Dublin bus, rail and Luas stops, and cycle lanes identified (Source: Bing Maps, annotated by MCG Planning, 2024)

The catchment area for the student accommodation concentration assessment is defined by a c. 1km radius of the subject site, equivalent to a c. 12-minute walking distance, which is considered suitable in determining overconcentration with respect to the proposed development, as illustrated in the figure above. A distance of c. 1km has been defined by Dublin City Council within the Development Plan (Section 15.13.1) as the suitable standard range to make informed observations on a proposed development, and the likelihood that a proposed development could undermine the principles of achieving a balanced pattern of development in the area. Given that the subject site is located within an urban inner-city context, in some cases Dublin City-wide or Dublin County-wide analysis has been evaluated to make observations on the wider Dublin PBSA and third-level education sectors.

The subject site is a well-located and enjoys a high level of access within its locational context to all the sustainable transport modes. For pedestrians, there are footpaths/public lighting on the surrounding street network with signalised pedestrian crossing throughout. The area has extensive designated cycle lanes leading to each of the main academic institutions. The site is within walking distance of both the Red Line Luas (Fatima Station, 20-minute walk) and the Green Line Luas (Harcourt Street Station, 15-minute walk). It is also within walking distance of a variety of bus routes operated by Dublin Bus. Dublin Bus Stop 2388 at St Kevin's Parade located 50 metres from the site provides links from the city centre to the site, and onwards through local suburban neighbourhoods towards Tallaght (No. 49 and 54a).

Bus Routes, Road Networks & Public Transport

Bus Services

The existing public transport facilities within the vicinity of the proposed development can be seen in Figure 6. The nearest pair of bus stops to the site are approximately 150m away (bus stop 2635 Warrenmount Lombard Street West). The 54A and 49 routes both depart from these stops and connect the development to Tallaght and Trinity College. Table 3 summarises the timetable of these routes. Student residents at Blackpitts will be able to travel to Trinity College in approximately 15 minutes via these routes.

Bus Stop 1348 (Leonard's Corner Spencer Street South), is located c. 450m south east of the site located along South Circular Road, which is served by a total of 6no. bus routes, operated by Dublin Bus provides links from the city centre to the site, and onwards through local suburban neighbourhoods towards Drimnagh and Ballinteer.

Bus Route	Operator	Locations	Peak Frequency
54A	Dublin Bus	Kiltipper Way – Tallaght – Kimmage Road – Harold's Cross – Clanbrassil Street – Pearse Street	AM – 3 services PM – 4 Services
49	Dublin Bus	Tallaght – Templogue – Terenure – Harlod's Cross – Clanbrassil Street Pearse Street	AM – 3 services PM – 4 Services
151	Dublin Bus	Tallaght – Templogue – Terenure – Harlod's Cross – Clanbrassil Street Pearse Street	AM – 3 services PM – 3 Services
56a	Dublin Bus	Kiltipper Way – Tallaght – Kimmage Road – Harold's Cross – Clanbrassil Street – Pearse Street	AM – 4 services PM – 4 Services
9	Dublin Bus	Limekiln Avenue - Charlestown	AM – 5 services PM – 5 Services
16	Dublin Bus	Ballinteer – Dublin Airport	AM – 5 services PM – 5 Services
68	Dublin Bus	Newcastle - Hawkins St	18 daily services
68A	Dublin Bus	Hawkins Street - Bulfin Road	2 daily services
122	Dublin Bus	Drimnagh - Ashington	AM – 5 services PM – 5 Services
720	Dublin Bus	Watling Street - Heuston Station	3 daily services

Table 3: Bus Frequency (Source: MCG Planning).

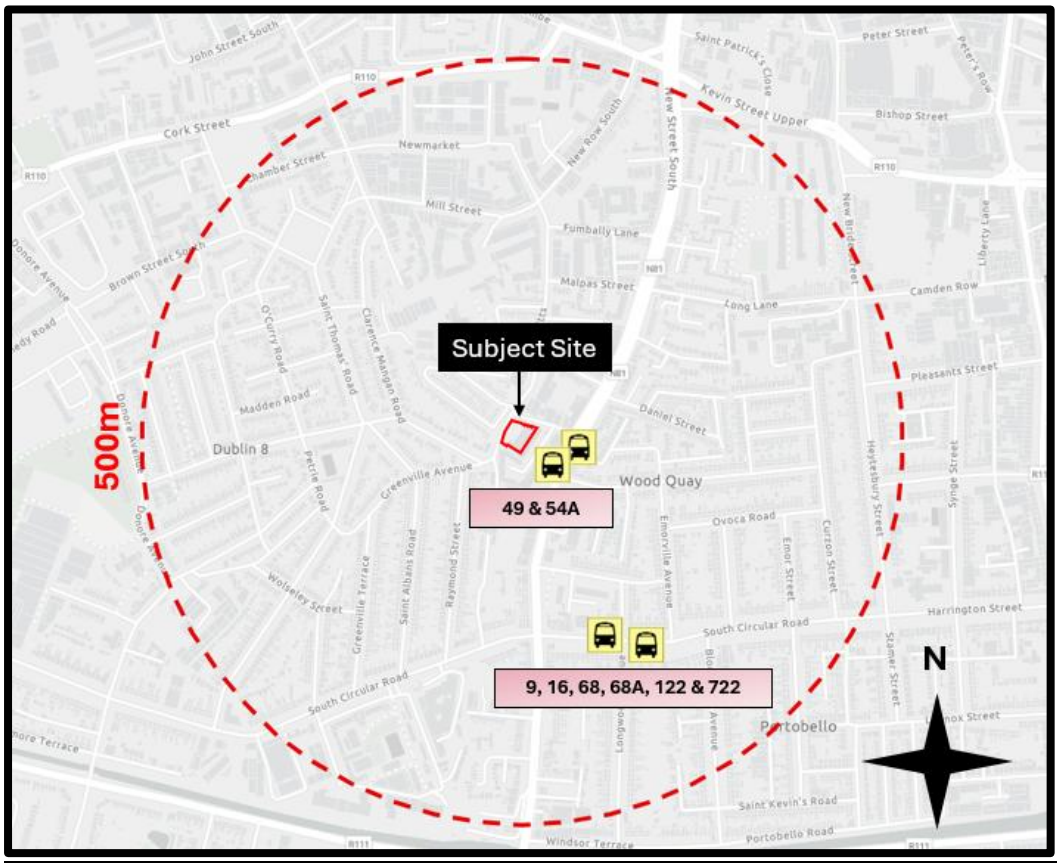


Figure 8: Bus Stops 1348 (Leonard's Corner Spencer Street) and 2635 (Warrenmount Lombard Street West)

Bus Connects

The BusConnects project will further enhance accessibility when fully introduced connecting the subject site to a range of Spine, Orbital and Local Routes satisfying local and commuting needs (Figure 2). For the subject site, the most relevant future routes will be the proposed F (F1, F2, F3) spine routes connecting Charlestown on the north side of the city, through the City Centre and near each of the major Third Level institutions, towards Tallaght on the south side of the city. This service aims to improve frequency and quality of service for the neighbourhoods of Tallaght, Terenure, Templeogue, Harold's Cross, Knocklyon and Firehouse, Broadstone, Drumcondra and Whitehall to the City Centre. Equally it aims to connect the F-Spine at various locations to Orbital Routes that facilitate direct connections to Third Level institutions outside of walkable or cyclable distances (such as DCU and IADT). This will provide significantly improved bus transport access to the subject site in the coming years.

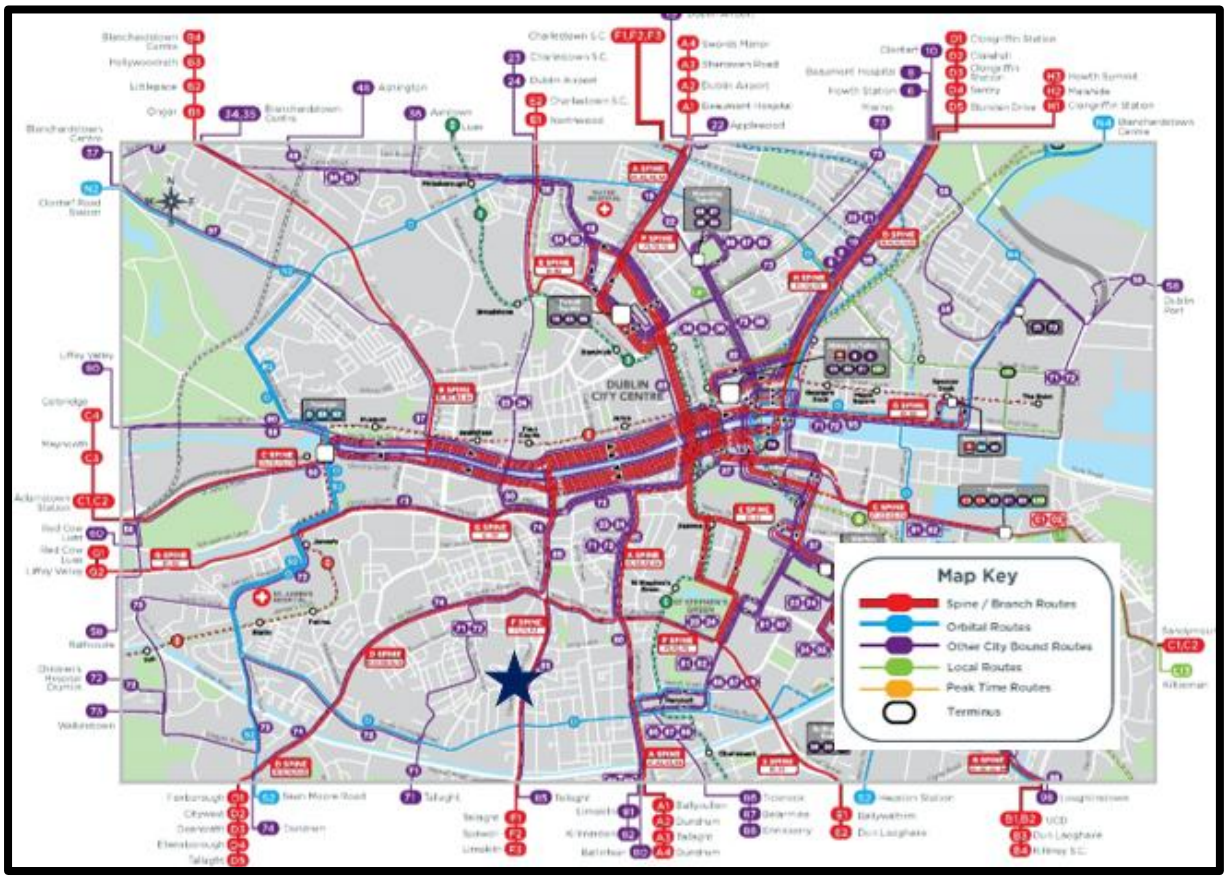


Figure 9: BusConnects Network (Indicative Location of the Subject Site Denotated by Red Star) (Source: BusConnects.ie, Annotated by MCG Planning, 2024

Light Rail Services

The Luas light rail network consists of two principal lines, which connect to one another at Abbey Street/Marlborough Street/O'Connell Street in Dublin City Centre.

- LUAS Red Line - (E-W) Dublin Docklands to Tallaght/Saggart
- LUAS Green Line (N-S) Broombridge to Bride's Glen

The site is within walking distance of both the Red Line Luas (Fatima Station, 20-minute walk) and the Green Line Luas (Harcourt Street Station, 15-minute walk).

Light rail services operating to and from this stop connect it directly Connolly or to the Point in the north-east (via Dubin city centre) and to Tallaght / Saggart in the south; interchange with the Luas Green Line is possible at Abbey Street. The Red Line Luas is a high frequency, high capacity and regular service, with trams at 3–5-minute frequency during peaks hours and 12-15 minutes frequency during off peak hours.

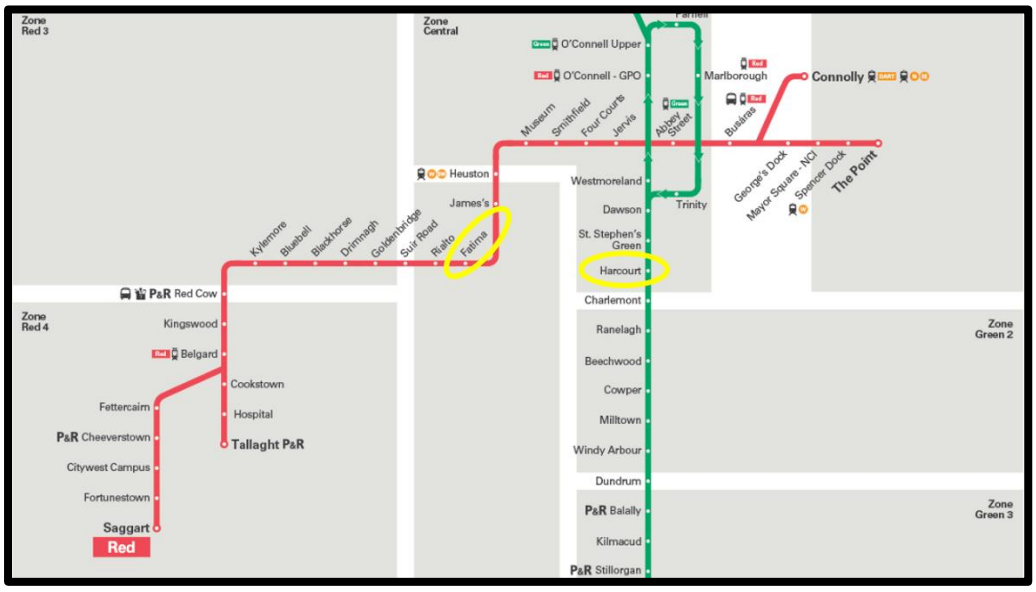


Figure 10: Luas Light rail map with nears stop highlighted in yellow

Cycle Infrastructure

At present the site has good pedestrian access with high quality footpaths present along Clanbrassil Street Lower (R137) to the east of the site. The southbound side of the road has a cycle lane, separated from general traffic by bollards. Donovan Lane is located adjacent to the site, to the north. The lane is narrow and facilitates eastbound traffic only, however footpaths are provided on both sides. There are no dedicated cycle facilities along the road. At present, access to the site is facilitated along Blackpitts which is flanked by footpaths on both sides. There are no dedicated cycle facilities along the road and therefore cyclists share this stretch of road with other traffic.

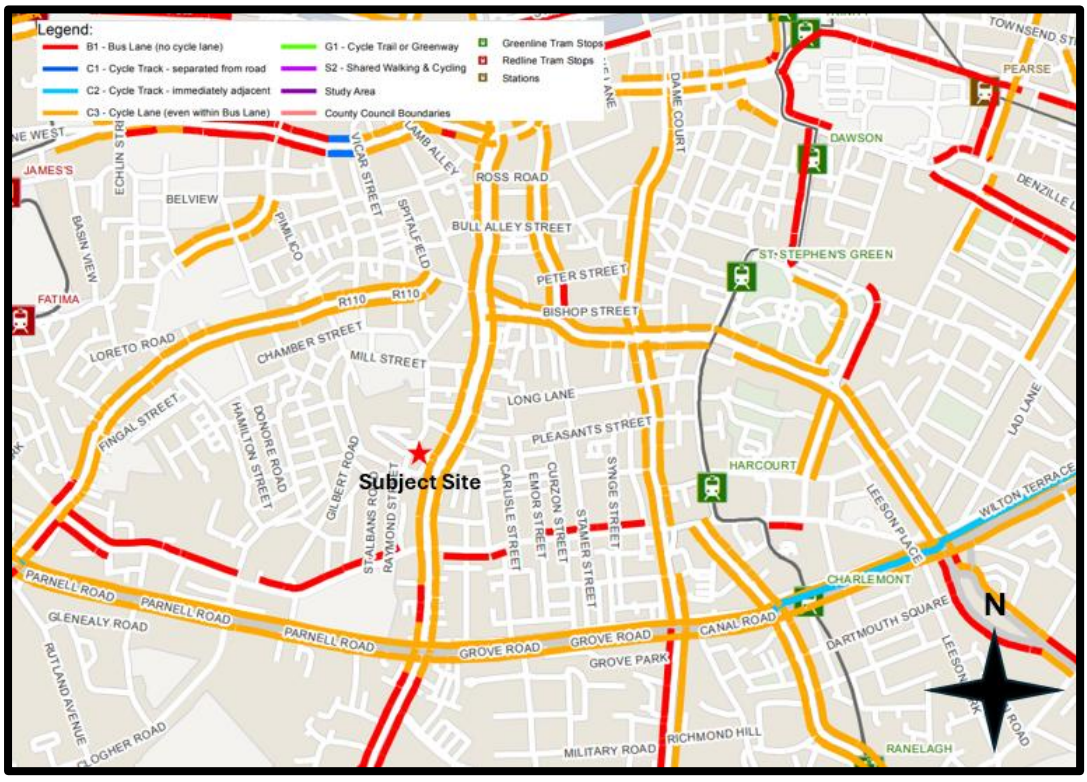


Figure 11: Greater Dublin Area Cycle Network Existing Facility (Ref: NTA, Aecom, Roughan & O' Donovan, 2013)

The National Transport Authority in conjunction with DCC has proposals to upgrade the cycle network as shown in Fig 11 below.

The National Transport Authority has instigated the Greater Dublin Area Cycle Network Plan to identify and determine in a consistent, clear and logical manner the following cycle networks within the GDA comprising:

• The Urban Cycle Network at the Primary, Secondary and Feeder level;

• The Inter-Urban Cycle Network linking the relevant sections of the Urban Network and including the elements of the National Cycle Network within the GDA. It shall also include linkages to key transport locations outside of urban areas such as airports and ports; and

• The Green Route Network being cycle routes developed predominately for tourist, recreational and leisure purposes.

Unlike area-based plans prepared previously by Local Authorities, this Cycle Network Plan is to be consistent across county boundaries such that there is continuity of route networks across these administrative boundaries.

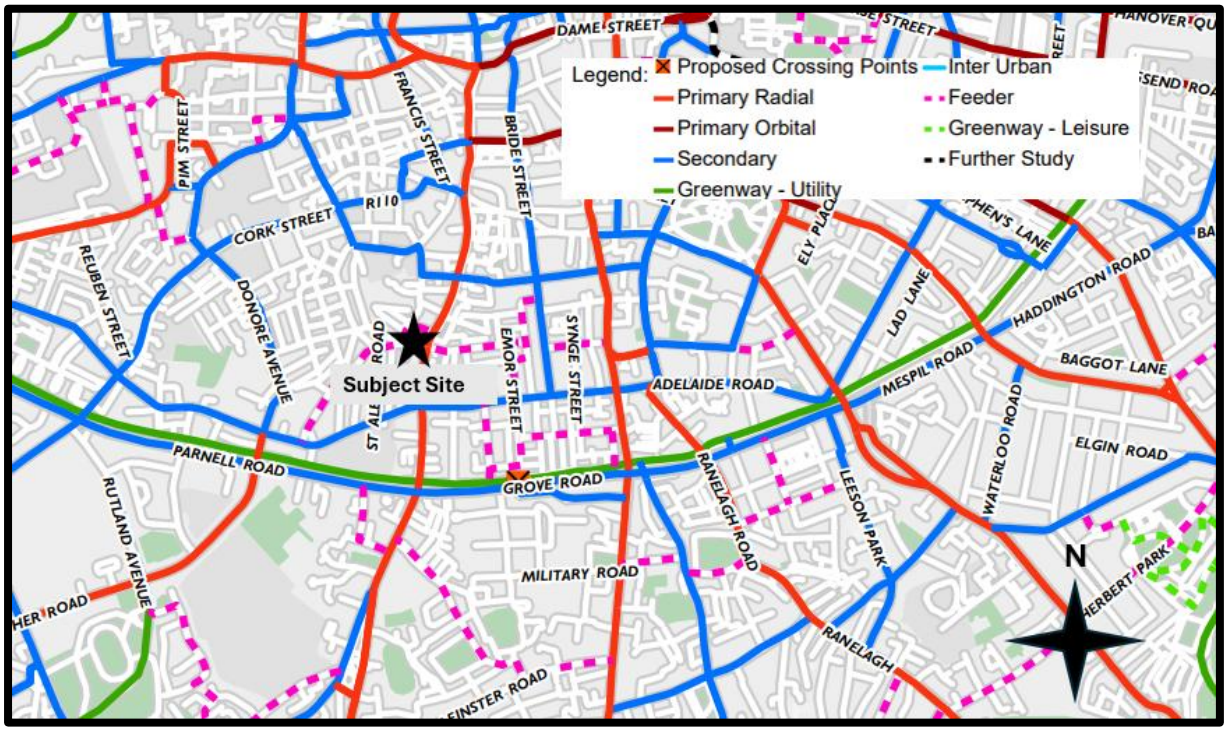


Figure 12: Greater Dublin Area Cycle Network Proposed Facility

There are large-scale existing cycle networks in place by DCC across the city and suburbs. It is noted that there are dedicated existing bicycle lanes running northwards along S Clanbrassil Street Lower (R137) to the east of the site and a network of urban cycle routes surrounding the development, facilitating the use of this sustainable form of transport (see Figure 10).

Social and Community Infrastructure Audit

This section of the report will assess the Social & Community infrastructure in the area which includes a range of services that contribute to the quality of life of residents of an area. They form a key element for the fabric of the area in terms of the social, physical, and mental wellbeing of a community.

This study is informed by a set of inventories that assess the availability and quality of services for the proposed Purpose-Built Student Accommodation in relation to community facilities, healthcare, retail and recreation. The services and facilities within a 1km and 2km buffer of the site have also been mapped.

This Social and Community Infrastructure Audit has been prepared in response to Table 15.1 of the Dublin City Development Plan 2022-2028 which states:

"Community facilities, such as local parks and playgrounds, community centres, local hubs, schools, childcare are an integral component of a successful neighbourhood. Applications for large residential developments or mixed-use developments should include provision for community type uses. All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development."

Demographic Profile

The demographic profile of the area was examined using the results from the Census 2011, 2016 and 2022 (the latest available on the CSO website). The scope of the assessment is determined by overlaying the 1 km radius buffer zone over the subject site and assessing the relevant spatial unit in demographic analysis. For the subject site, the CSO defined Small Areas were used to develop the relevant catchment area boundary (as outlined in white in Figure 12).

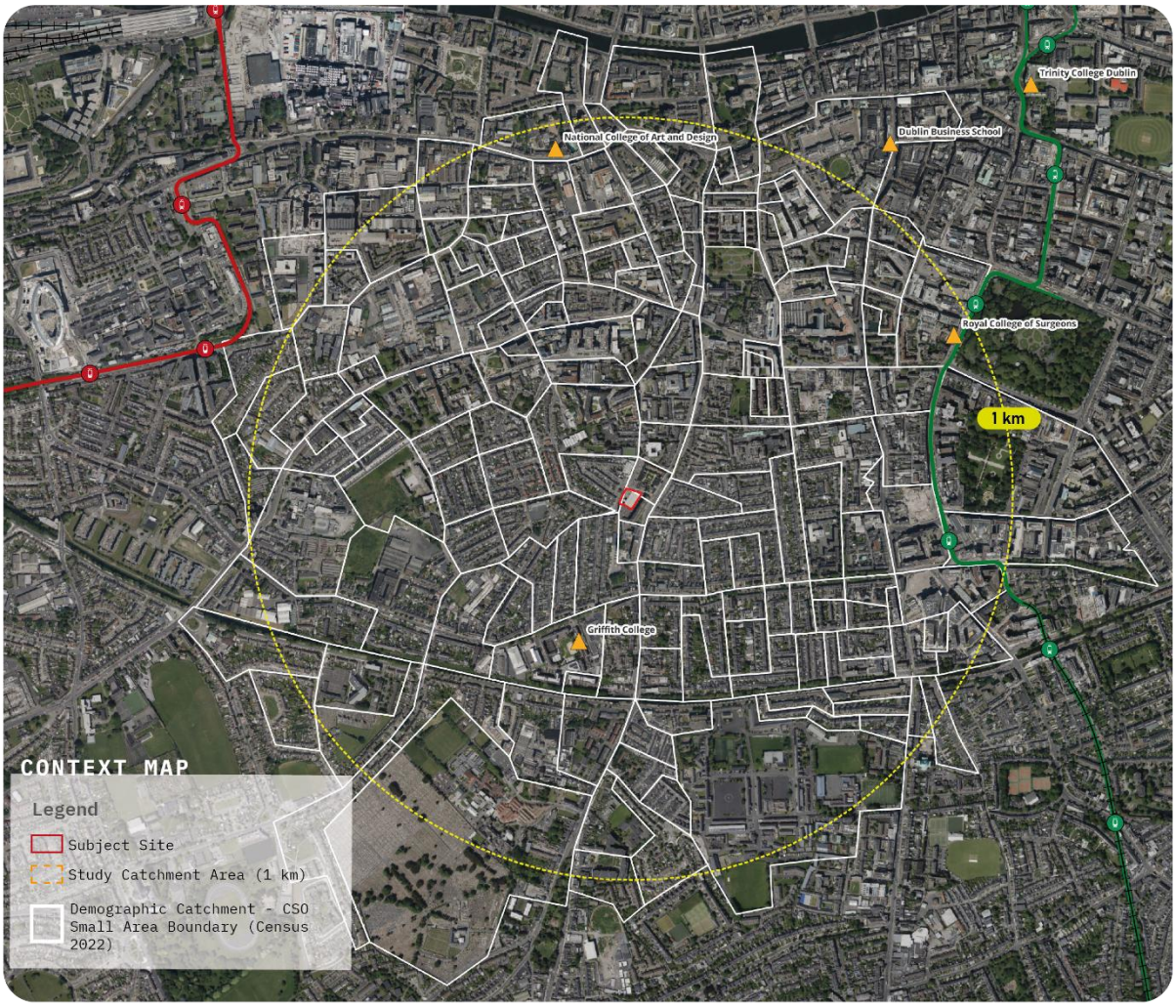


Figure 13: Extent of Demographic Study Area Comprising 169 No. of the CSO Defined Small Area Boundaries relevant to the Subject Site (Source: CSO, 2022, Bing Maps, annotated by MCG Planning, 2024)

As stated above, the CSO defined *Small Areas* were used to develop the demographic profile of the relevant catchment by overlaying the 1 km radius buffer zone over the subject site. The catchment contains 169 No. small areas with a total population of 41,168 persons in 2022.

	2016 Population	2022 Population	Population Change 2016-2022	Percentage Change 2016-2022
Study Area	36,800	41,168	+4,386	11.2%
Dublin	1,347,359	1,458,154	+110,795	8.2%
Ireland	4,761,865	5,149,139	+387,274	8.13%

The total population of the Local Catchment Area is 41,168 persons which was established from the CSO Census Data 2022. This is a 11.2% increase from the 2016 CSO Census Data. This is a considerably higher population increase compared to the nation and Dublin average. The census data shows that the population of Ireland increased by 8.13% from 2016-2022 to a total population of 5,149,139.

Age	Year 2016	Year 2022	Change	Percentage Change
0-4	1,649	1,834	+185	+10.6%
5-19	3,477	5,082	+ 1,605	37.5%
20-34	15,052	14,941	-111	-0.74%
35-64	13,243	15,516	+ 2,273	+15.8%
65+	3,379	3,795	+416	+11.6%

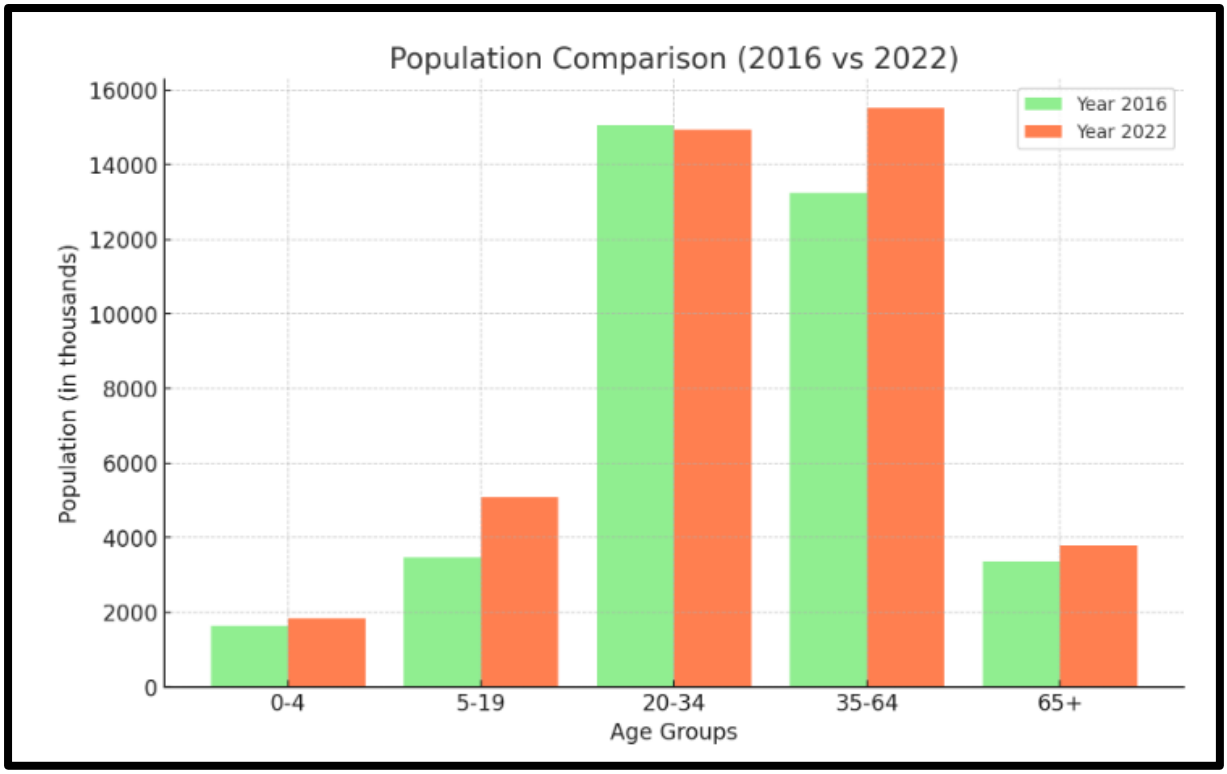


Figure 14: Population Changes 2016-2022

The 2022 census shows us that within the study area 4.45% of the residential population were aged between 0-4, or a total of 1,834 children. A further 5,082 persons are aged between 5 and 19 years old or 12.34% of the total population. The 20 to 34 years old cohort comprises 14,941 persons or 36.29% of the total population. The 35-64 age group comprised of 15,516 persons which is 37.69% of the 2022 Local Catchment area. The remaining 3,795 (9.22%) persons were aged 65+ within the Local Catchment Area in 2022.

In 2022, there were 5,203 persons aged 15+ years old and classified as a student in the catchment, accounting for 12.6% of the total population. For the purposes of this study, these persons are classified as the student population[1]. In 2022, the proportion of population aged 15+ years old and

[1] The methodology employed by Edinburgh City Council uses persons 16+ years old still in education. This exact cohort delineation in data could not be provided by the CSO, and so all persons aged 15+ years old still in education are included. For the purposes of this analysis, these are considered to be directly comparable.

classified as a student in the wider Dublin City administrative area was 9.1% (or 54,195 persons). Notably, the population aged 15+ years old and classified as a student was larger in 2011 (6,037 persons), and a much higher proportion of total population than it is currently (at 16.6%).

Table 4 Study area population percentages compared to the Dublin and National standards

Age	Study Area Population 2022	% of Study Area	% of Dublin	% of National
0-4	1,834	**4.45%**	5.6%	5.7%
5-19	5,082	**12.34%**	19%	20.5%
20-34 Adults	14,941	**36.29%**	22.4%	18.2%
35-64 Adults	15,516	**37.69%**	40%	40.6%
65+ Adults	3,795	**9.22%**	13.4%	15.1%

Assessment of Existing Community Facilities

This Social and Community Infrastructure Audit assesses a range of services and facilities that would be expected in a community, conducive to enabling a high-quality standard of living for the existing and future residents, whether they are students, homeowners or renters. This audit will address key themes that constitute community facilities as outlined below. The themes will be analysed with regard to their context within the defined study area, with several varying buffer radii from the subject site.

The majority of the facilities are within 1 km from the site. This area is generated by a 1km "as the crow flies" buffer zone. It is worth noting that while the majority of the audit identified infrastructure within 1 km of the subject site, some facilities extend just beyond this range into 2km.

Table 5 Categories considered for the Social and Community Infrastructure Audit

Category	Description
Health Services	GPs, Pharmacies, Health Centres, Hospitals
Open Space / Sports and Recreation	Parks, Pitches, Residential Green Areas, Playgrounds
Retail Services	Supermarkets, Convenience Shops, Speciality Services, Restaurants/Takeaways, Pubs
Community/Cultural Facilities	Community Centres, Libraries, Theatres, Museums/Galleries, Concert Halls, Memorials, Religious Facilities

The walking time map below identifies the areas that can be reached within a 5, 10, 15-minute walk from the subject site.

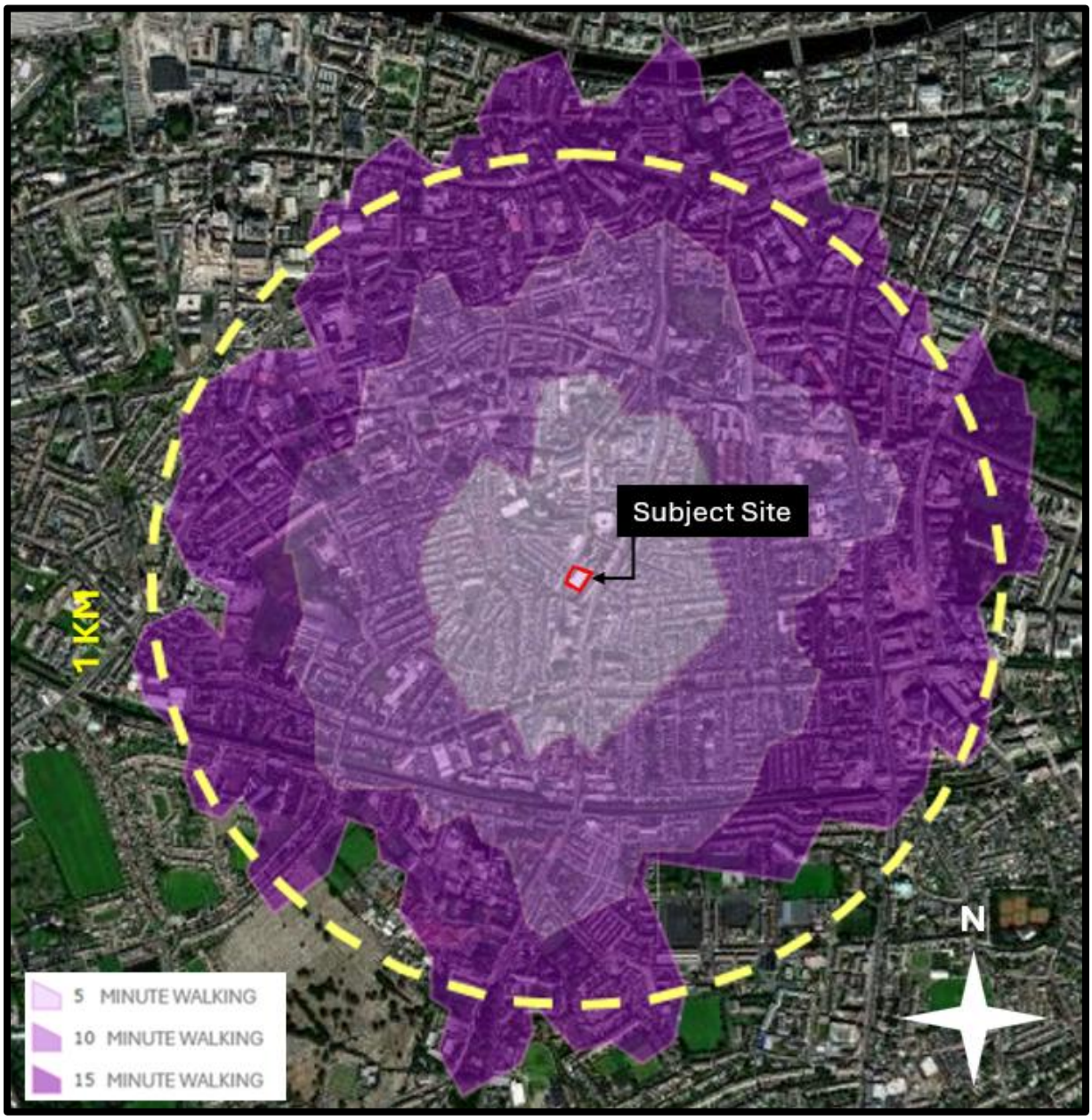


Figure 15: Walking times from Subject site

Health Services

The availability of, and access to, quality health services and facilities is a key element to creating sustainable neighbourhoods. Given this inner-city location and proximity to the city centre, there is a well-established network of multiple types of healthcare services including GPs, pharmacies and other health facilities such as acupuncture, holistic medicine, foot care, physical therapy and naturopathy.

A total of 24 health facilities were identified within 2km of the subject site. These facilities are illustrated in figure 15 below and listed in table 6 below under each category. The table and map below demonstrate the accessibility of the site to a wide range of healthcare facilities within 1km and 2km of the site.

No. on Map	Health Facility	Location
General Practitioner		
1.	Camden Medical Doctors	Heytesbury St, Dublin 8
2.	Lowell Medical	Dublin City GP
3.	Doctor Bradys Medical Practice	12 Camden Street Upper
4.	South Circular Road GP	106a S Circular Rd, Wood Quay
5.	Eldon Family practice	119 S Circular Rd, Dublin, D08 VC0H
Pharmacies		
6.	Phelans Pharmacy	22 Clanbrassil Street Lower
7.	Leonards Corner Pharmacy	106 S Circular Rd, Wood Quay
8.	McCabes Pharmacy	11 Heytesbury St, Wood Quay
9.	Pure Pharmacy Camden Street	11-12 Redmond's Hill
10.	Foody's Pharmacy	The Harcourt Buildings, Harcourt St
11.	McCauley Pharmacy	Charlemont St, Charlemont Sq
12.	Coombe Community Pharmacy	Earls Court, Unit 2 Dolphin's Barn St
13.	Your Local Pharmacy	McGoverns Corner, 2 Cork St, The Liberties
14.	Foley's Pharmacy	39 Meath St, The Liberties
15.	Patrick Street Pharmacy	Ardilaun Court, Patrick St, The Liberties
16.	Thomas Court Pharmacy	Hanbury Ln, The Liberties
17.	Liberties CarePlus Pharmacy Thomas Street	36, Thomas Street
18.	Morgan's Chemist	55 Thomas St, The Liberties
19.	Reilly's Pharmacy Thomas Street	Thomas St, The Liberties
Medical Centre		
20.	The Meath Primary Care	1-9 Heytesbury St, Portobello
21.	RCSI Hospitals Group	111 St Stephen's Green
22.	Our Lady's Hospice	Harold's Cross Road,
23.	Thomas Court Medical Centre	1 St Catherine's Ln W, The Liberties
Hospital		
24.	The Coombe Hospital	Cork St, Saint James

Table 6: Health Services within 1km of subject site

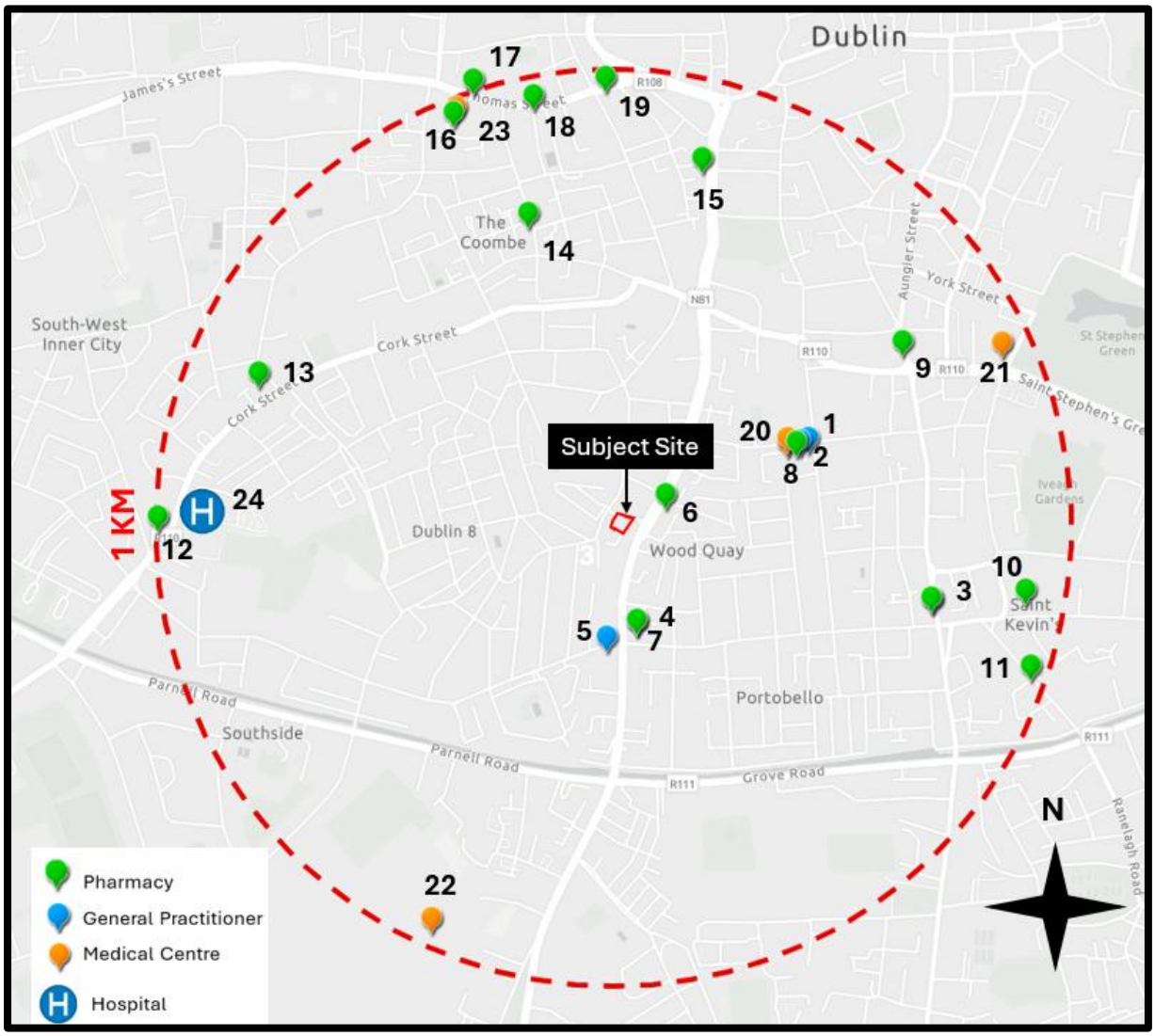


Figure 16: Health Services within 1km of subject site

Open Space and Recreation

The availability of, and access to, open spaces, affordable sports and recreation facilities that are within easy reach by walking, cycling and public transport is of considerable importance. The subject site is within km of St Stephens Green Park, which is a is a Victorian public park, with tree lined walks, shrubberies, colourful flowerbeds, herbaceous borders, rockeries, and ornamental lake and a garden for the visually impaired. The scheme is also a short distance from Iveagh Gardens and number of smaller urban pocket pocks. St Catherine's Community Sports Centre is easily accessible, which is a Council operated multi-functional facility serving the social and recreational life of communities in the Dublin 8 area.

No. on Map	Open Space and Sports Facility	Location
1.	Cabbage Garden	Cathedral Ln, Portobello
2.	St. Patrick's Park	Bull Alley Street
3.	St Stephen's Green	St Stephen's Green
4.	Iveagh Gardens	St Stephen's Green, Park, Dublin 2
5.	Weaver Park	128 Cork St, The Liberties
6.	Oscar Square	Oscar Square, The Liberties

7.	St Catherine's Community Sports Centre	Marrowbone Ln, The Liberties
8.	Harold's Cross Park	Harold's Cross Rd, Harold's Cross

Table 7: Open space & Recreation within 1km of subject site

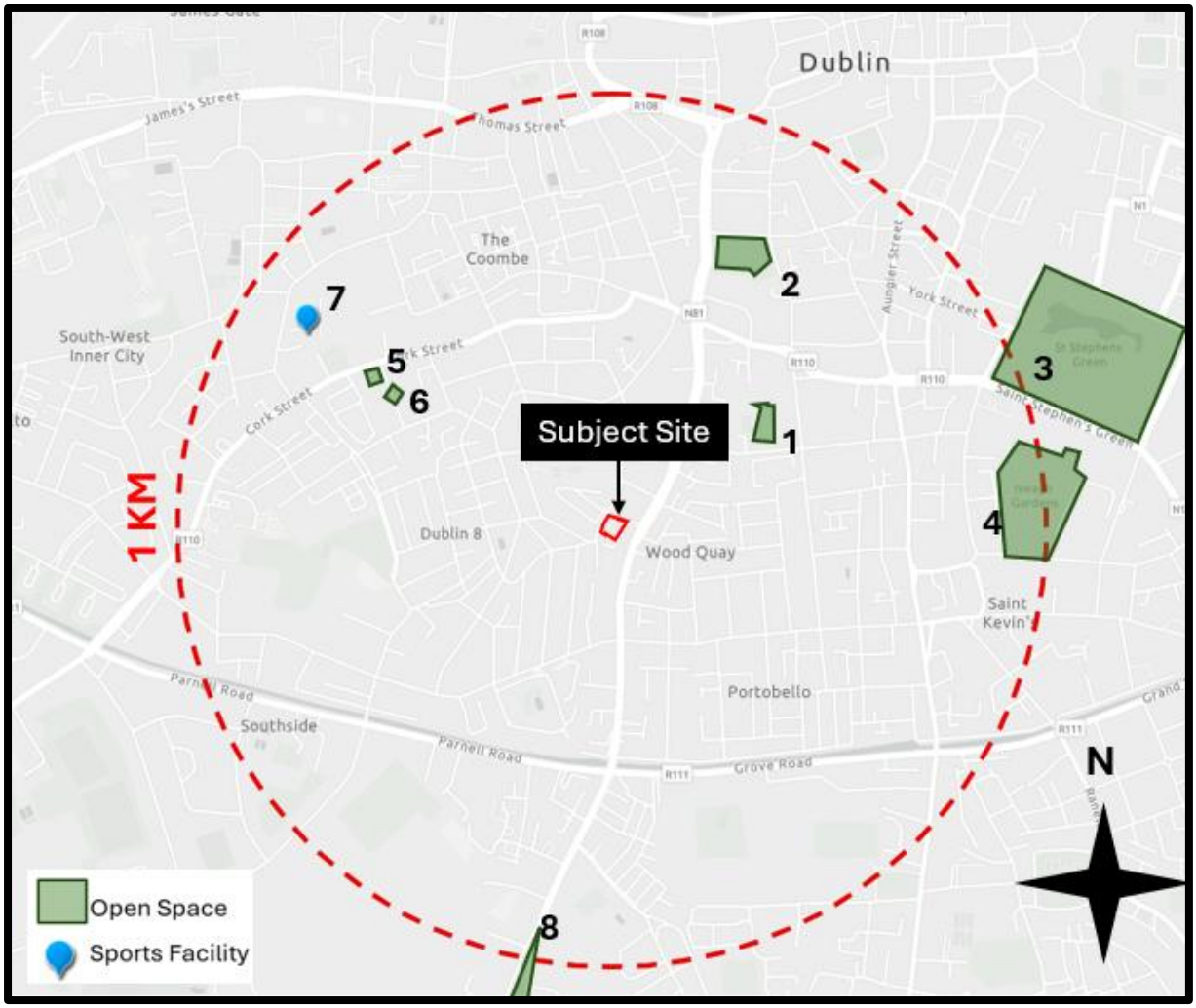


Figure 17: Open space & Recreation within 1km of subject site

Retail

The subject site is easily accessible to a range of retail and entertainment services along Clanbrassil Road and the surrounding area. Surrounding areas include for neighbourhood centres and smaller independent boutique type retail units. Given the inner-city location and the general requirement of critical mass allows for a wide range of retail facilities, services, entertainment options to form around the core of the town. St Stephens Green Shopping Centre and Grafton Street are located within 1.5km of the subject site.

No. on Map	Grocery/Convenience Store	Location
1.	Mace	Saint Patricks Court, Clanbrassil Street Lower
2.	Shop Easi	Clanbrassil Street Lower, Merchants Quay,
3.	Spar	176 S Circular Rd, Saint Catherine's

4.	Timgad Grocery and Halal Meats	205 S Circular Rd
5.	Lidl	Cathedral House, 52 Patrick St
6.	Centra	McGoverns Corner, Cork St, The Liberties
7.	Tesco Express	2 Creation House, & 6, Newmarket Yards
8.	Spar	Cathedral House, 52 Patrick St
9.	Tesco Express	Aungier St, Redmond's Hill
10.	Fresh	1-4 Camden Street Lower, Saint Kevin's
11.	Tesco Express	41 Camden Street Upper, Saint Kevin's
12.	Spar	Unit 1, Richmond St S, Saint Kevin's
13.	Lennox Street Grocer	38 Lennox St, Portobello
14.	Spar	13 S Circular Rd, Wood Quay
15.	Lidl	71 Aungier Street
16.	Neighbourhood Centre	Clanbrassil St Lower/South Circular Road

Table 8: Retail provision within 1km

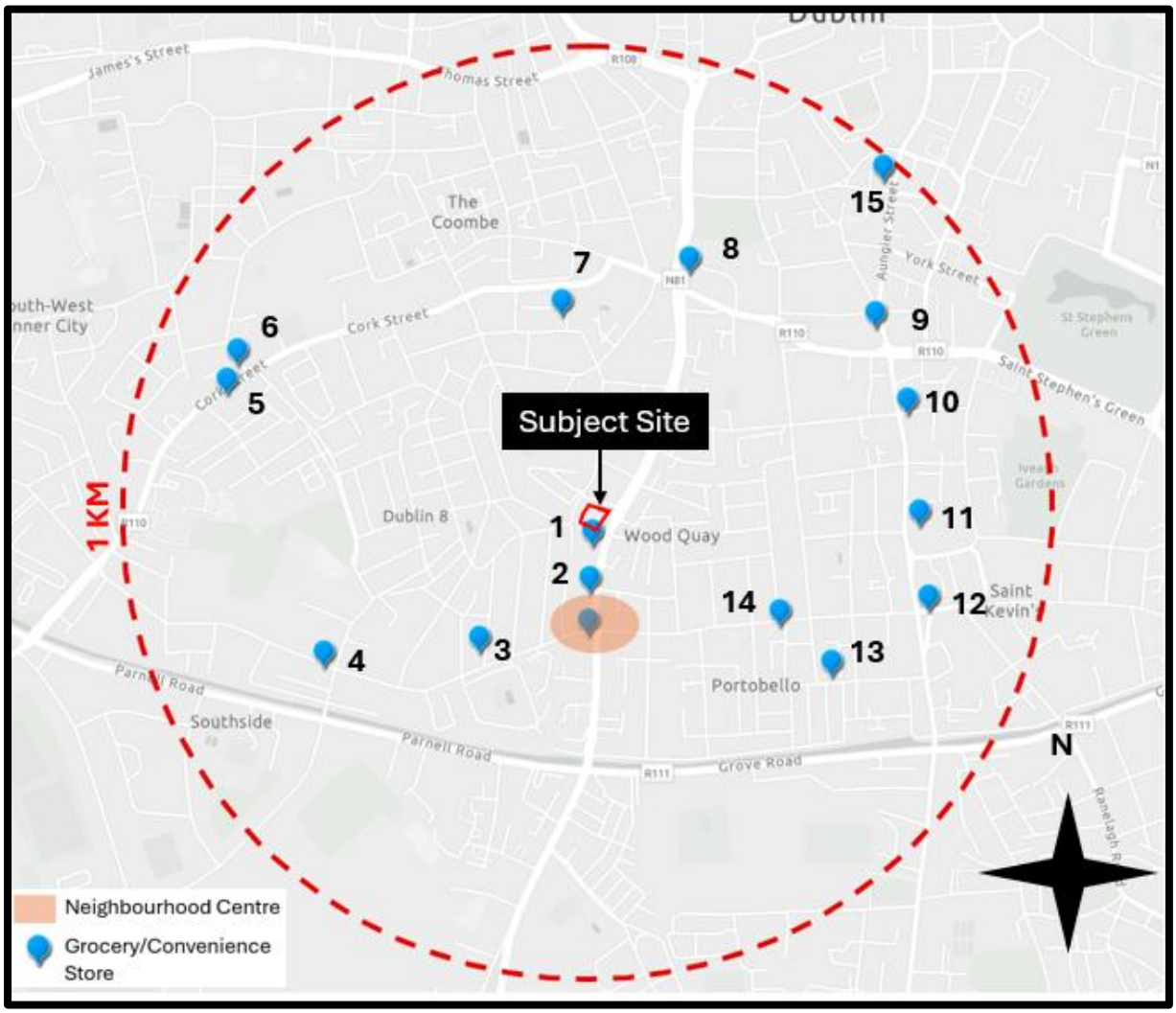


Figure 18: Retail provision within 1km

Community Centres, Cultural and Religious Facilities

The subject site's surrounding area has an extensive network of community facilities and places of worship. The timely provision of faith facilities is of considerable importance to ensuring the religious needs of the existing and future population is met. Churches, burial grounds and other places of worship form a focal point for the local population and often provide not only a religious service but also meeting places and other cultural services. A number of concert venues, performing arts centre and Libraries are also located within 1km catchment of the site, for example Vicar Street and Marshes Library.

No. on Map	Community Centres, Cultural and Religious Facilities	Location
1.	Griffith College Library	8 S Circular Road
2.	The National Stadium	145 S Circular Road
3.	St. Teresa's Church	Donore Avenue
4.	UCKG Helpcentre - The Universal Church	The Watkins Building, 8 Ardee St, The Liberties
5.	Southwest Inner-City Network (SWICN)	Digital Court, Rainsford St, The Liberties
6.	SICCDA South Inner City Community Development Association	90 Meath St, The Liberties
7.	St. Catherine's Church	Meath St, The Liberties
8.	Vicar Street	58-59, Thomas St, The Liberties
9.	Carman's Hall Community Centre	Carman's Hall, The Liberties
10.	St. Nicholas of Myra Church	Francis St, The Liberties
11.	The Iveagh Trust Museum Flat / Nellie's Flat	Patrick Street
12.	Chester Beatty	Dublin Castle, Dublin 2
13.	St Patrick's Cathedral	St Patrick's Close
14.	Marsh's Library	St Patrick's Close, Dublin 8
15.	Kevin Street Garda Station	41 Kevin Street Upper
16.	Carmelite Community Centre	56 Aungier St, Dublin 2
17.	Whitefriar Street Church	56 Aungier St, Dublin 2
18.	Kevin Street Library	18 Lower Kevin Street Lower
19.	Dublin Unitarian Church	112 St Stephen's Green
20.	UCD Newman House	86 Newman House, St Stephen's Green
21.	Christ City Church Central	Synge St, Dublin
22.	St. Kevin's Church	Harrington St, Saint Kevin's
23.	St Kevin's Community Centre	45 Bloomfield Ave, Portobello
24.	Charlemont Community Resource Centre	French Mullen House, Charlemont St, Saint Kevin's

Table 9: Community Centres, Cultural and Religious Facilities within 1km of subject site

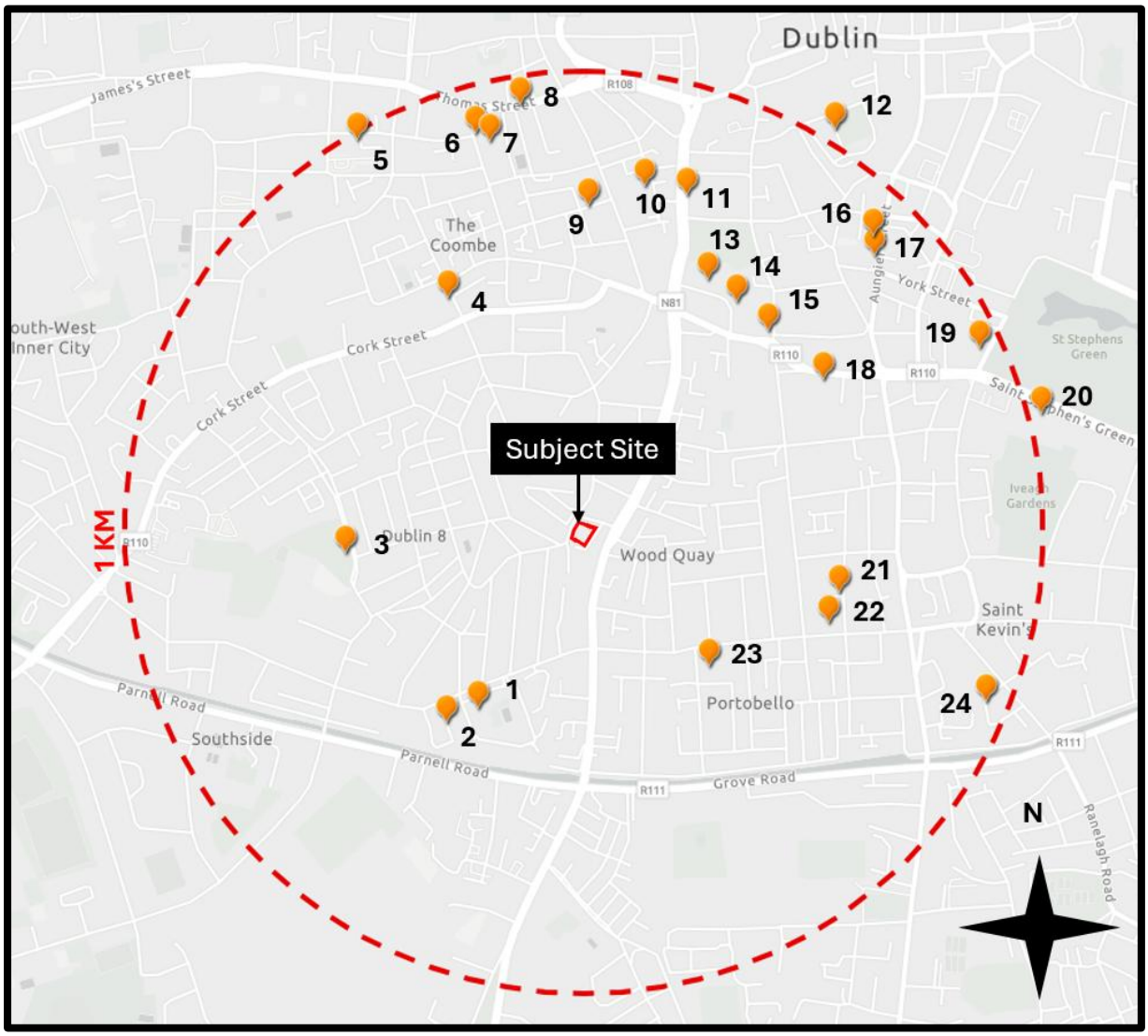


Figure 19: Community Centres, Cultural and Religious Facilities within 1km of subject site

Conclusion

The Social and Community Infrastructure Audit has demonstrated that the subject site is located in close proximity to a range of facilities that will meet the needs of future student residents of the proposed development. The subject site is also well served by healthcare facilities within a short distance from the site. In addition, there are an extensive range of GP clinics and pharmacies located in the area which will serve the needs of future student residents at the subject site.

There are excellent retail provisions in the area including St Stephens Green Shopping Centre, Grafton Street, along with public houses and restaurants around the Liberties and Portobello.

This area contains a strong mix of land-uses with a balance of residential, office, and retail buildings, as well as community and amenity areas within a 1km radius of the site. Given the strategic location of the subject site near the core city centre area, with resident populations within walkable distance of safe cycle routes, local public transport, health facilities, parks, shops, and other infrastructure, the lower density residential area pertaining in part of the catchment, where possible, should be prioritised to contribute towards core CDP objectives aligning with the 15-minute city and compact

growth. In this case, an underutilised site currently comprising light industrial units offers a huge opportunity to increase population density and provide much needed housing to the area, while not displacing any existing resident populations.

The proposed development will generate a demand on the existing services and facilities, such as public open space and natural amenities and has ease of access to large open spaces such as St Stephens Green. The site is also well located in relation to community facilities with a wide range of clubs and amenities being located in the surrounding areas.

The proposed student accommodation is expected to contribute positively by fostering social benefits, including increased cultural diversity and vibrancy, which can, in turn, support the growth of community, cultural, and arts activities in the area.

Therefore, it is submitted that the current provision of social services and community amenities in the area can accommodate the future student residents.

Planning History

McGill Planning have carried out a review of the planning history of the site. Dublin City Council planning files indicated that permission was originally granted in 1991 (DCC Ref. 1350/91) to develop a "cash and carry enterprise centre" on the site. In 2005 permission was granted to change the use of one of the units to offices (Ref. 2904/05). In 2015 permission was also granted for "upgrading and improvement works at the existing enterprise centre, consisting of reinstatement of four original windows to the rear first floor elevation, internal alterations and refurbishment" (Ref. 3682/15).

In the wider Blackpitts/Newmarket and wider Dublin 8 area there have been a number of significant, high-density developments permitted in recent years on brownfield sites for a variety of uses, including apartments (Build to Rent and Build to Sell), student accommodation and hotels, with a number of these built or under construction.

Subject Site

Previously approved planning applications on site are listed below:

DCC Reg. Ref:	1350/91
Decision:	Granted Permission subject to 10 conditions
Description:	Permission granted on 22nd October 1991 for a Cash and Carry Enterprise Centre on part of former McHenry Site.

DCC Reg. Ref:	2179/99
Decision:	Granted Permission subject to 3 conditions
Description:	Permission was granted on 22 March 2000 to erect a mansard type roof to existing building to form offices in new roof space.

DCC Reg. Ref:	2904/05
Decision:	Granted Permission subject to 4 conditions
Description:	Permission was granted on 16 August 2005 for the change of use of retail warehouse to office use including alterations to existing ground floor external facade and internal remodelling at Unit 3, Enterprise House, Blackpitts, Dublin 8.

DCC Reg. Ref:	3682/15
Decision:	Granted Permission subject to 7 conditions
Description:	Permission was granted on 16 February 2016 for upgrade and improvement works at existing enterprise centre (approved under Reg Ref. 1359/91) consisting of reinstatement of 4 no. original windows to rear 1st floor elevation, internal alteration and overall refurbishment of existing enterprise centre.

Developments in the Vicinity

The former Scholars Bar along Donovan Lane for the change of use of an existing bar/restaurant to residential apartments. At the time of writing these works appear fully completed. Other nearby development of note is a mixed used development at 25-26 Blackpitts, for the construction of a Mosque and 27no residential apartments ranging in height up to 7 storeys.

DCC Reg. Ref:	2025/18
Decision:	Granted Permission subject to 12 conditions
Address:	Former Scholars Bar, Donovan Lane, Dublin 8
Description:	Permission was granted on 27th July 2018 for construction of a terrace of 3 no. three storey townhouses to the front (west) of the former Scholar's Bar, associated alterations to the parking area of the previous application Reg. Ref. 4142/16 for the change of use of the former Scholar's Bar into 4 no. apartments, proposed vehicular access will be from Donovan Lane, total car parking quantity for the existing granted 4 no. apartments and the proposed 3 no. townhouses will be 7 no. (one each per unit), all to existing two storey building at the former Scholar's Bar, Donovan Lane, Dublin 8.

DCC Reg. Ref:	4142/16
Decision:	Granted Permission subject to 7 conditions
Address:	Former Scholars Bar, Donovan Lane, Dublin 8
Description:	Permission was granted on 28 September 2016 for refurbishment and change of use of existing two storey bar/restaurant into apartments within the existing building. The height and windows will largely remain unchanged with some additions. The building will accommodate three number 3-bedroom apartments and one number 2-bedroom apartment with 3 roof terraces and 3 gardens facing south/east and a communal open space to the north/west. Permission is sought to demolish a front extension porch to the west elevation, and for partial demolition of a rear extension to the east to form new gardens. It is proposed to lower a block on the south/east corner to form a floor terrace and extend and continue the roof profile to access the same roof terrace. It is proposed to add an escape stair from this upper roof terrace to the lower roof terrace. Permission is sought for the construction of an escape stairs to the southeast from the lower roof terrace to an escape lane at the rear of the site. Permission is sought to construct a dormer to the north/east and for raised parapet walls to the roof terrace at same location. Permission is sought of 6 new skylights to the roof. Permission sought for two new opens to the west elevation. Vehicular access will be via the existing entrance to the former Scholar's Bar, Blackpitts. Parking is provided on site for up to 7 cars. Pedestrian access will be retained form Donovan Lane to the site via a gate on the Southern boundary. Total number of apartments is 4.

DCC Reg. Ref:	3454/14
Decision:	Split Decision (Permission & Refusal)
Address:	Former Scholars Bar, Donovan Lane, Dublin 8
Description:	A split Decision was issue on 05 May 2015 for the conversion of the existing 2 storey Bar into 3 storey within the existing building with the overall height to remain as is and to accommodate 4no. 2 bedroom apartments at ground, first and second floors together with balconies facing South / East with a glass link bridge at first floor to link into new proposed 3 storey building to the North West of the site with roof garden, cafe/bar/restaurant at ground floor and 1 no. 3 bed apartment at first and second floor with 1no 2 bed apartment at third floor together with roof garden and lift, with Balconies facing South / East and North / West all with onsite bin storage, cycle racks, communal open space, signage and

	associated site development works, total number of apartments 7. The apartment block was omitted from the development.

DCC Reg. Ref:	2654/20
Decision:	Granted Permission subject to 17 conditions
Address:	25-26, Blackpitts, Dublin 8
Description:	Permission for a mix development consisting of demolition of the existing 2-storey warehouse type structure that is currently in permitted use as a religious, cultural and community building; construction of a mixed-use development in a building ranging from 3 to7 storeys over basement level; Mosque located at ground floor and mezzanine level; 27 no. residential apartment units with balconies located on first to sixth floor consisting of 6 no 1-bed units 20 no.2-bed units; 1 no. 3 bed unit. The development will include cycle parking, plant rooms and storage areas for apartment and mosque at basement level, bin store at ground floor level and all associated development works, signage, landscaping, boundary treatments and services.

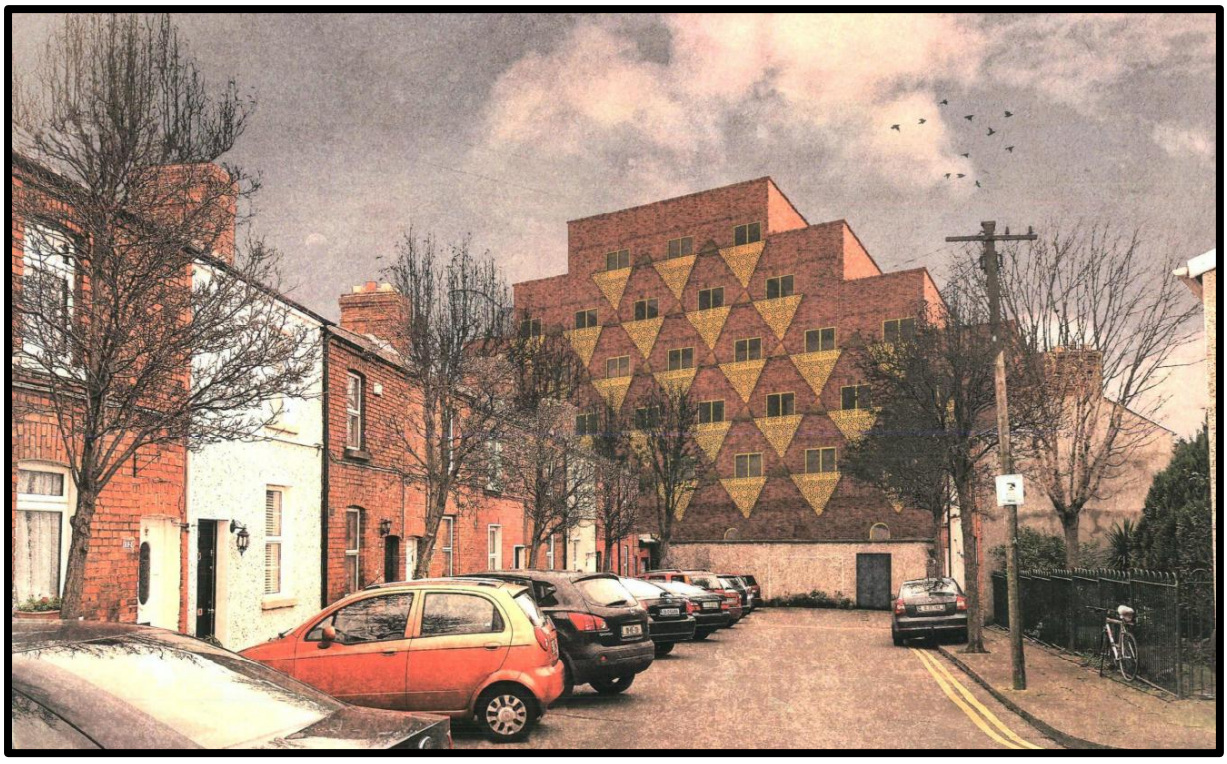


Figure 20: Proposed CGI Views Reg Ref: 2654/20 Source: JFOC Architects

Figure 21: Proposed CGI Views Reg Ref: 2654/20 Source: JFOC Architects

Surrounding Area

McGill Planning have reviewed recent residential developments within close proximity to the subject site. We note a number of relatively recently permitted residential developments within approx. 750m from the subject site.

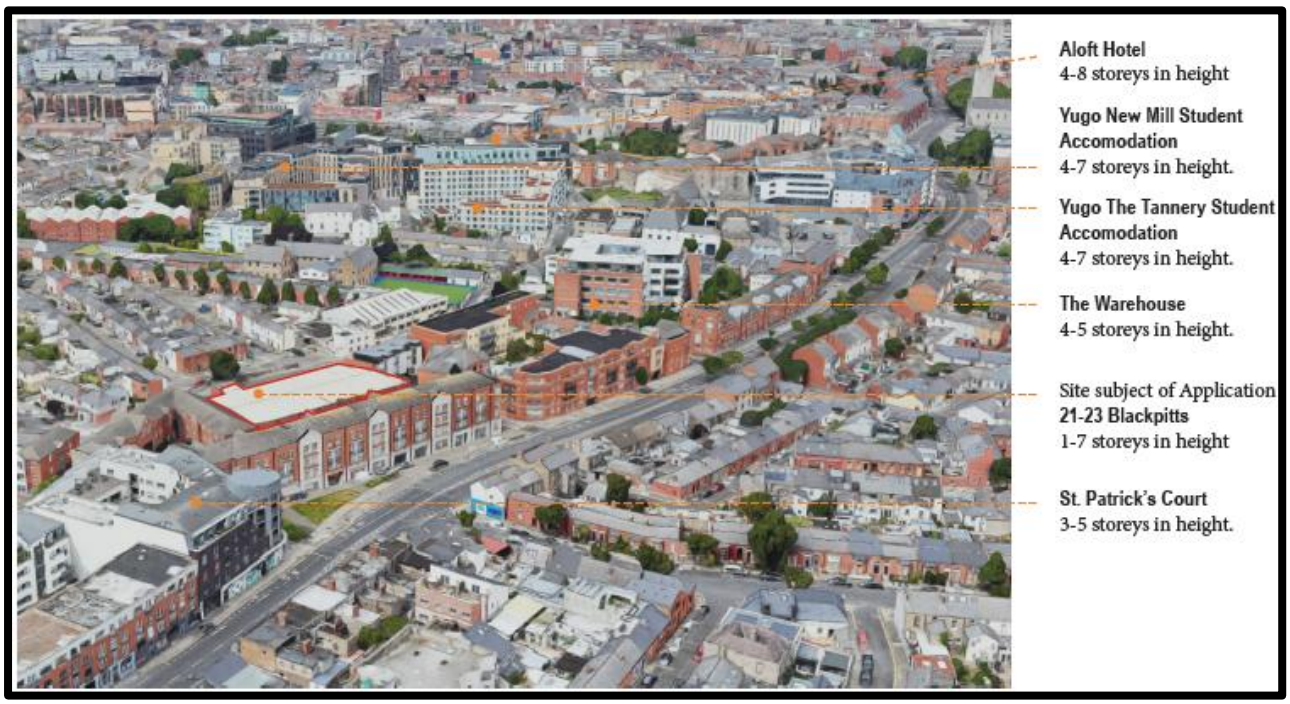


Figure 22: Surrounding Developments

These developments are considered of direct relevance to the current proposal given the broad similarities as examples of modern brownfield infill development within wider Blackpitts/Newmarket/Cork Street and wider Dublin 8 area and at heights and densities similar to the current proposal, and also with reduced car parking. The ability to integrate with the existing urban character of the area is a further consideration.

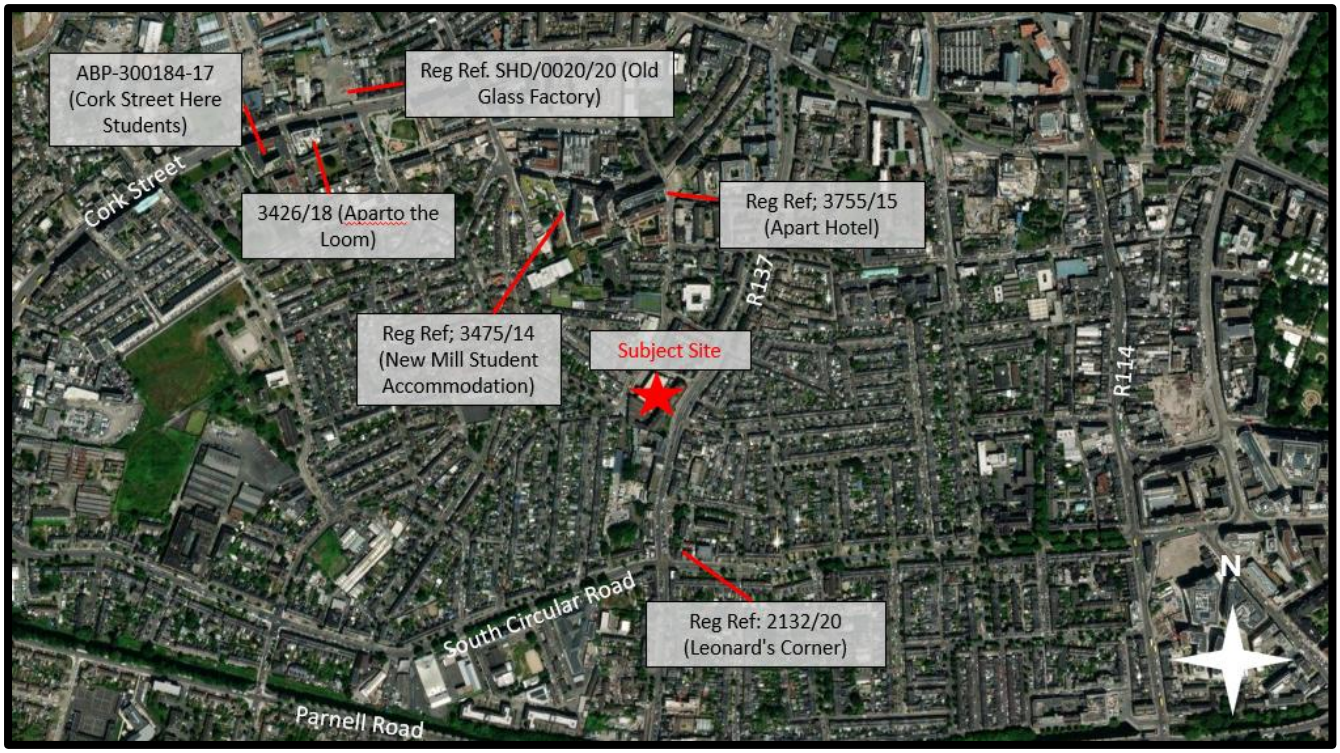


Figure 23: Locations of Significant Developments in Vicinity of Subject Site

DCC Reg. Ref:	SHD0020/20
Decision:	Granted Permission subject to 26 conditions
Address:	The Old Glass Factory at rear 113-115 Cork Street; No. 118 Cork Street and lands at rear; No. 119, 120, 121, 122 Cork Street, all with adjoining lands to the rear; No. 56 John Street South and adjacent laneway, Dublin 8 (ABP-308162-20)
Description:	Permission was granted on 22nd December 2020 for a strategic housing development at this c. 0.45 ha (4,504 sq m) site comprised of The Old Glass Factory at the rear of Nos. 113, 114 and 115 Cork Street (no eircode); No. 118 Cork Street (D08 E7PD) and lands to the rear of No. 118 Cork Street (D08 DR0K); No. 119 Cork Street (D08 EK44), No. 120 Cork Street (D08 X763), No. 121 Cork Street (D08 VH36) and No. 122 Cork Street (D08 K52Y), all with adjoining lands to the rear; and No. 56 John Street South (D08 KA99) and the adjacent laneway, Dublin 8. The development will principally consist of: the demolition of all existing buildings on the subject site (2,243 sq m) and the construction of a part 4 No. to part 7 No. storey over basement Build-to-Rent Shared Living Residential Development comprising 397 No. bedspaces (377 No. single occupancy rooms, 8 No. single occupancy accessible rooms and 6 No. double occupancy rooms) with circulation cores, providing a Gross Floor Space of 14,047 sq m (plus an ancillary basement of 513 sq m). The Gross Floor Area of the scheme above ground is 13,224 sq m over a basement of 1,336 sq m.

Figure 24: Proposed CGI Views Reg Ref: SHD0020/20 Source: 3D Design Bureau

DCC Reg. Ref:	2132/20
Decision:	Granted Permission subject to 12 conditions
Address:	Leonard's Corner - No.s 52, 52A, 53, 54 and 55 Clanbrassil Street Lower and No.s 110/112 and 108, South Circular Road, Dublin 8
Description:	Permission was granted on 14th January 2021 for demolition of the single storey storage shed to the rear of the vacant plots at no. 52, 52A and 53 Clanbrassil Street Lower, the 2-storey retail/cafe building at 54 and 55 Clanbrassil Street Lower, the 3-storey building with 2 no. apartments over retail at no. 110/112 South Circular Road & the single storey launderette building 108 South Circular Road. Construction of a 5-storey with part 6-storey over basement mixed use building consisting of 2 no. retail units at ground floor and basement: Unit no. 1 (c.221sqm) fronting Clanbrassil Street Lower and Unit no. 2 (c.291 sqm) fronting the corner of Clanbrassil Street Lower and South Circular Road with service access to both units off Clanbrassil Street Lower with communal lift, plant room and bin store provided at basement level; 19 no. apartment units with associated balconies/winter-gardens/terraces to the north/south/east/west elevations comprising of 6 no. studio type apartments, 8 no. 1 bed apartments, 4 no. 2 bed apartments and 1 no. 3 bed apartment; 2 no. communal east facing roof terraces to the rear located at first floor and fourth floor level; residential bin store and 40 no. secure bicycle spaces at ground level with communal residential storage at basement; all accessed from Clanbrassil Street Lower; and all associated site works.

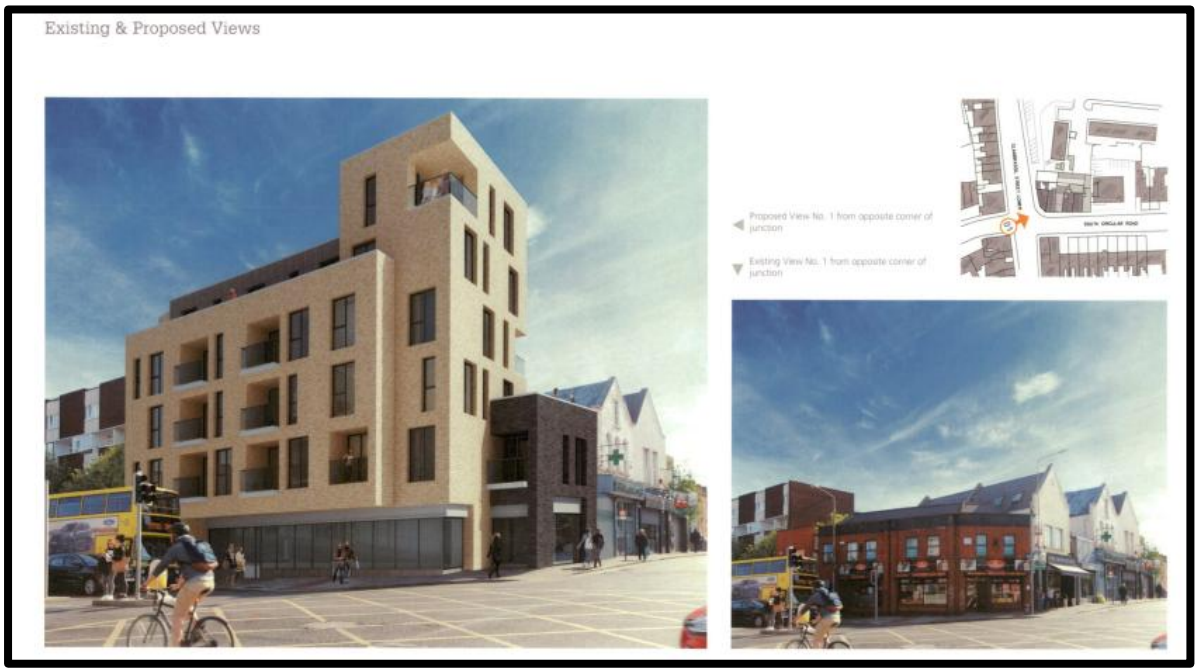


Figure 25: Existing and Proposed Views Reg Ref: 2132/20 Source: Darmody Architecture

DCC Reg. Ref:	3426/18 (Aparto the Loom Scheme)
Decision:	Granted Permission subject to 18 conditions
Address:	The Donnelly Centre Phase 2 Building, Cork Street/Brickfield Lane, Dublin 8
Description:	Permission was granted on 17th December 2018 for Demolition of the building on site known as The Donnelly Centre Phase 2 (totalling c.728 sq.m) -Construction of a development comprising 166 student accommodation bed spaces with associated ancillary areas and a retail/enterprise unit (119 sq.m), in a five to seven storey high building over basement with frontage onto Cork Street and Brickfield Lane. The development has a maximum height of 23.5m over ground level. -The proposed student accommodation development includes indoor ancillary services for occupants at ground floor level including a gym, common room, management office, reception and storeroom. -Open space is provided within a courtyard at ground floor level (234 sq.m.) and podium level landscaped terrace at first floor level (238sq.m.) Accessible landscaped roof terraces are also located at 5th floor level (138 sq.m.) and 6th floor level (99 sq.m.). -The student accommodation will be available for short-term stays for tourists or other visitors outside of term time. -The proposal includes signage, all ancillary site works, hard and soft landscaping and boundary treatments. An ESB substation and switchroom are proposed at ground floor level. A plant room and storage room are proposed at basement level. -82 no. cycle parking spaces are proposed at ground floor level, which are accessed via the internal courtyard area. -A set down parking area and disabled car parking space will be provided along Brickfield Lane.

	-Access to the student accommodation development and retail / enterprise unit is to be provided from Cork Street. Service access is to be provided from Brickfield Lane.

Figure 26: Proposed Views Reg Ref: 3426/18 Source: Henry J Lyons

ABP Reg. Ref:	ABP-300184-17 (Cork Street Here Students)
Decision:	Granted Permission subject to 20 conditions
Address:	The Donnelly Centre, Cork Street, Dublin 8.
Description:	399 student accommodation bed spaces with associated ancillary services and a retail/cafe unit with frontage onto Cork Street and Brickfield Lane. The overall building is arranged around a central courtyard and is between six and seven storeys, with a total height of 23 metres.

Figure 27: ABP-300184-17 As Built. Source Google Street View

DCC Reg. Ref:	3755/15 (Apart Hotel)
Decision:	Granted Permission subject to 13 conditions
Address:	Junction of Mill Street and Blackpitts, Dublin 8
Description:	Permission was granted on 13th Jan 2016 to undertake modifications to a permitted mixed-use development (Reg. Ref. 2768/09, as extended to 27th August 2019 under Reg. Ref. 2768/09/x1) at the junction of Blackpitts and Mill Street in Dublin 8 (Tenter's Pub). Permission is sought to modify the hotel element of the permission at the north end of the site (Blocks A, C & D under the permitted development). There are no changes to the height of the permitted hotel (Block A). The facades of the Tenter's Pub (Block C) and craftworks building (Block D) remain as part of the permitted scheme. The modifications involve increasing the number of bedrooms to 202 (from 188) primarily achieved by replacing the first floor level meeting rooms with bedrooms; minor increase of floor area at all floor levels; removing the double height link between Mill Street and the internal street to the south and replacing same with new floorspace (resulting in revised layout at ground floor level for food and beverage / retail units / gym and additional bedrooms at first floor level); providing the reception area at the top (seventh) floor (along with meeting room, food and beverage) and outdoor roof terrace to

	east/south side; minor changes to bedroom sizes and layouts; modification to external facades on all four sides; reconfiguration of the hotel lobby area; introducing new taxi drop off area to south side; adjustment of floor to ceiling height at first and seventh floor levels; decreasing the footprint of the basement under the hotel (now smaller sized double height basement). The gross floor area of the amended hotel is c.9, 577sq.m including basement of c.543sq.m. The total increase in gross floor area compared to the permitted hotel amounts to c.468sq.m. The modification also seeks to remove the lower-level basement (level -2) under the science and technology block (Block B) to the south of the scheme which contains the parking for the permitted hotel. All associated site works including new bicycle spaces and revised landscaping of the internal street to the south side.

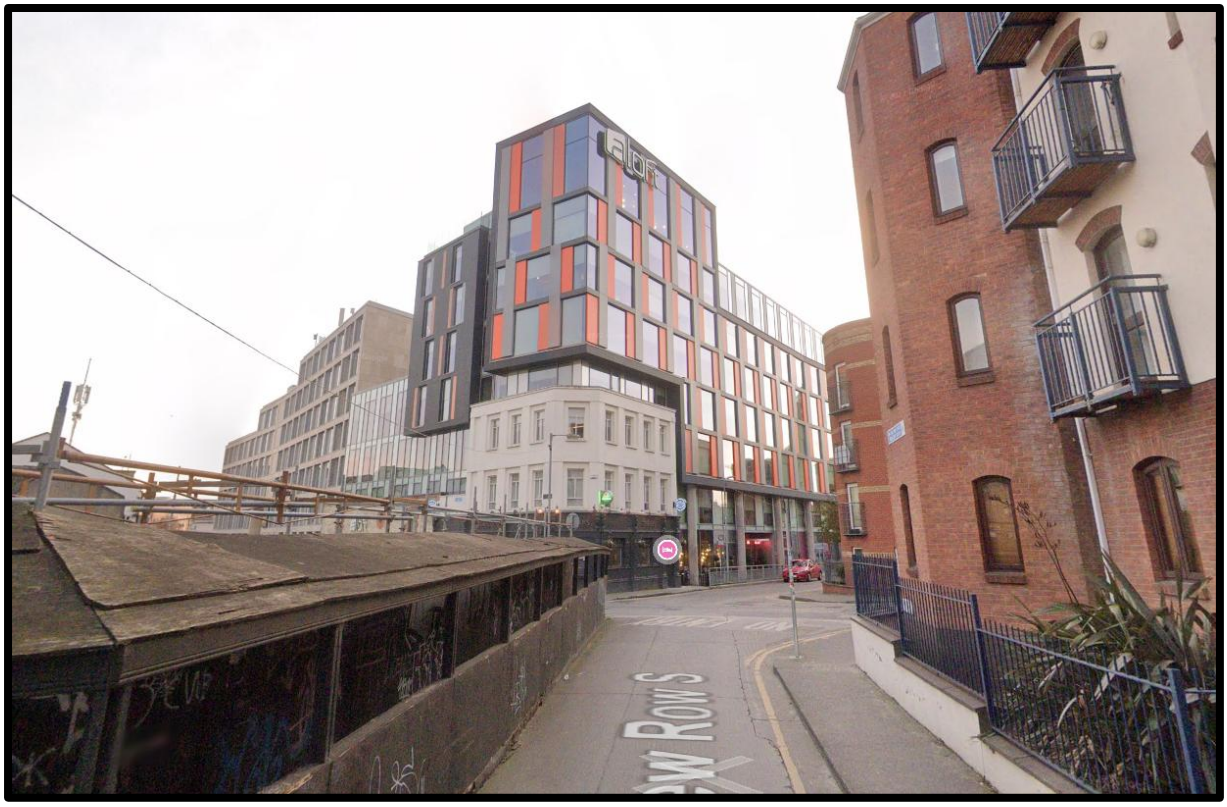


Figure 28: Reg Ref 3755/15 (Apart Hotel) As Built. Source Google Street View

DCC Reg. Ref:	3475/14 (New Mill Student Accommodation)
Decision:	Granted Permission subject to 22 conditions
Address:	Lands bound by Mill Street (to the north), Sweeney's Terrace/Clarence Mangan Road (to the west), Warrenmount Lane (to the east) and grounds of Warrenmount Convent (to the south), Including, 10, Mill Street, Newmarket, Dublin 8
Description:	Permission was granted on 04th September 2015 for construction of a mixed-use Student Accommodation, Office, Retail and Restaurant/ Event Space development totalling 18,796 sq.m gross floor area (GFA) and including the restoration of No. 10 Mill Street (Protected Structure) and the adjoining former Mission Hall. The proposed development will comprise of a total of 96 no. Student

	Accommodation units (including 36 no. Studio units) providing a total of 406 no. student bedspaces, together with ancillary student accommodation facilities including social space, gym, laundry facilities, management office, (15,093 sq.m GFA in total), including the provision of a single storey pavilion building for student and community uses (65 sq.m); 4 no. retail/ commercial units ranging in size from 35 sq.m to 201 sq.m GFA (539 sq.m GFA in total); new office space (2,137 sq.m GFA); the restoration, adaptation and reuse of No. 10 Mill Street (a Protected Structure) as a restaurant/ café/ multi-purpose event space (507 sq.m) and adjoining former Mission Hall for office use (520 sq.m GFA). The proposed development is arranged in a total of 5 new blocks (A, B, C, D, E) which range in height from 4 no. storeys to 7 no. storeys with setbacks at various levels, and a basement plant area (313 sq.m) under Block C (located centrally within the site).

Figure 29: 3475/14 (New Mill Student Accommodation) As Built. Source Google Street View

Proposed development and Rationale

Description of Proposed Development

As set out within the Statutory Notices, the proposed development will comprise the following:

- Demolition of the existing commercial/industrial building on site (c. 2,140 sq.m in total).
- Construction of a Purpose-Built Student Accommodation scheme (c. 7,675 sq.m in total) within one block ranging in height from 4 to 6 storeys (over basement), comprising 217 no. student bedspaces (209 no. single rooms and 4 no. twin rooms) within 32 clusters.
- Provision of internal communal amenity space at basement and ground level, including parcel room, reception/common area, concierge desk, library/study room, multiuse rooms, laundry room, cinema room, and gym.
- Provision of external amenity spaces including outdoor courtyard area at ground floor level and external rooftop terrace.
- A café-restaurant (c. 144.5 sq.m) at ground floor level.
- Provision of cycle parking at basement and surface levels, a pedestrian and service entrance along Donovan Lane and a pedestrian and bike/service entrances along Blackpitts.
- Landscaping, boundary treatments, waste management areas, and services provision (including ESB substation), as well as all associated works required to facilitate the development, including connection to the Uisce Éireann network.
- Plant areas at basement and roof level.
- Associated public realm improvement works along Donovan Lane and Blackpitts, including alterations to the existing footpaths/public road, provision of 5 no. set-down spaces (including 1no. DAC-compliant space) and 1no. loading bay along Donovan Lane.

Proposal

The proposed development is to deliver 213 no. bedrooms within 32 clusters amounting to a total of 217 bedspaces, within a 'U' shaped block up ranging in height up to 6 storeys over basement. Associated amenity space and facilities, communal open space, bicycle parking will also be available. Each floor will have a generous en-suite, ample storage/desk space and in general, exceed the minimum standards set out in the Dublin City Council Development Plan 2022-2028. Large windows are provided to these rooms which address either the adjoining streets or the internal courtyard while also gathering as much natural light as possible. The bedrooms are grouped together in clusters of no more than 8, with each cluster sharing an appropriately sized kitchen-common area. The levels above ground floor house the majority of the student rooms.

The proposed development includes a range of internal and external facilities for residents' use.

<u>Resident support facilities:</u>

- Management desk, lobby/reception space with seating (ground floor)
- Parcel room (ground floor)
- Laundry room (basement)
- Waste room (basement)
- Secure bicycle storage (basement)

<u>Resident services and amenities:</u>

- Café/restaurant (ground floor)
- Gym (basement)

- Library/study room (ground floor)
- 2x multi-use room (ground floor and basement)
- Cinema room (basement)
- Kitchen/living/dining area within each cluster

External facilities:

- External courtyard
- Roof terrace

The reception desk, parcel room, library/study room, multi-use room and café/restaurant will be in the lobby on the ground floor of the building. This area provides the central point of contact for residents and visitors. It is near the main entrance, facilitating easy access to the building and other communal areas.

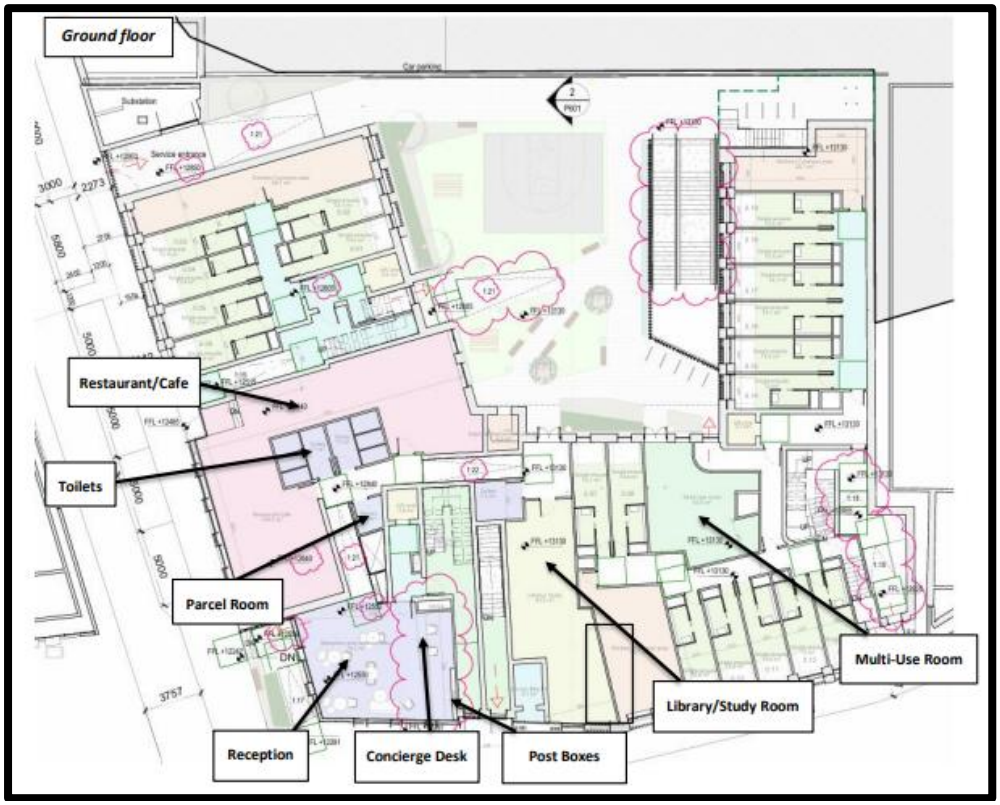


Figure 30: Ground Floor Amenities and Services

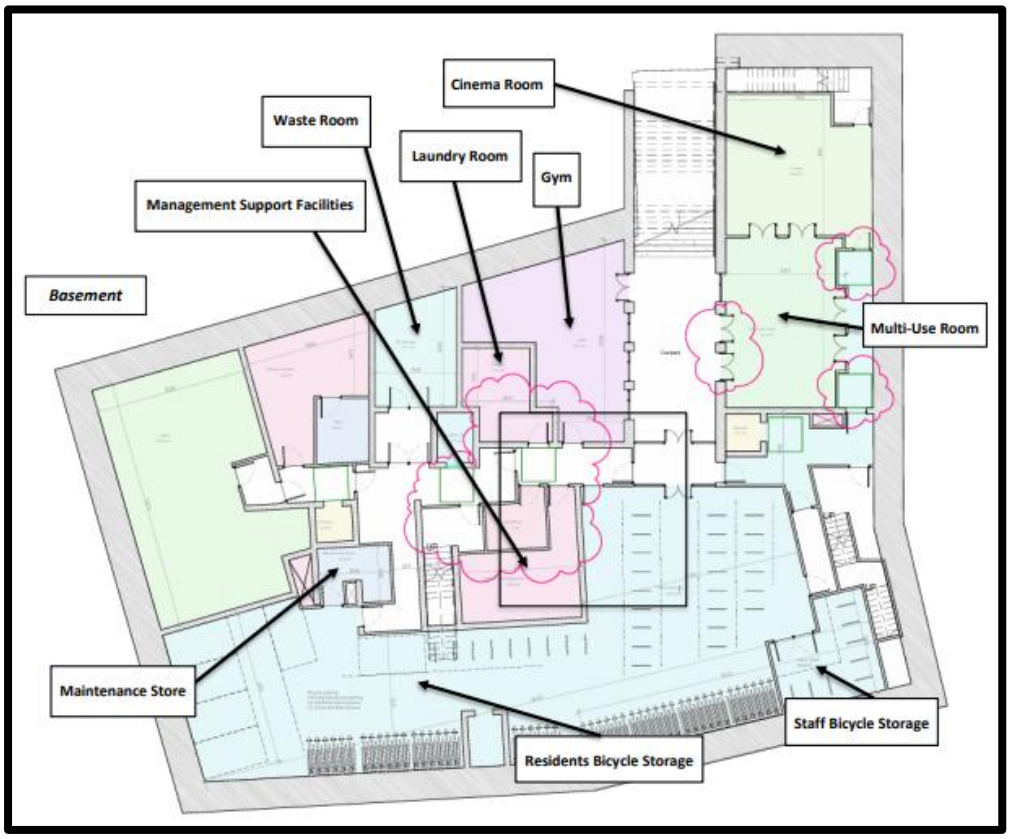


Figure 31: Basement level Amenities and Services

Rationale

The proposed development is located in Dublin's inner city and seeks to deliver purpose-built student accommodation (PBSA) in a central and accessible location. The site is in reasonable proximity to several of the country's major third-level institutions and is considered highly suitable for this form of residential use, helping to meet an identified need for student housing in the area.

The site is within a 15-minute cycle of Trinity College Dublin, the National College of Art and Design, the Royal College of Surgeons, Griffith College, Dublin Business School, University College Dublin, Technological University Dublin (Grangegorman), and the National College of Ireland. Together, these institutions had a combined enrolment of over 82,000 students in 2023, underscoring the ongoing demand for student accommodation in this part of the city.

National, regional, and local planning policy supports the reuse of brownfield and infill sites for residential development. The Dublin City Development Plan 2022–2028 encourages the provision of PBSA to help relieve pressure on the wider housing market and to ensure that student housing is appropriately located and managed. Under the Z1 zoning designation – "Sustainable Residential Neighbourhoods" – student accommodation is an "Open for Consideration" use. The proposed development is consistent with this zoning objective, which seeks to support residential uses and enhance local amenity.

The subject site is a brownfield plot located within a wider area undergrow significant regeneration in the south inner city. It is within walking distance of Dublin city centre, multiple higher education institutions, well-served public transport options (bus, Luas, and rail), and a broad range of services

and amenities. The development supports broader planning objectives for compact, well-connected urban growth as outlined in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES).

More specifically, the site lies within the Blackpitts–Newmarket area, which has experienced significant change in recent years, including the redevelopment of similar brownfield sites for mixed-use and higher-density schemes. These include residential (such as build-to-rent and PBSA), cultural, tourism, and institutional uses – for example, the recently approved mosque development at Blackpitts. (Please refer to figure 20 & 21). The location on Clanbrassil Street Lower, a key approach route to the city centre, presenting a unique opportunity to establish a new urban edge and activation to the street integrating with the adjoining apartment development to the south. The proposal will also improve connectivity and activity along Donovan Lane, contributing to improved passive surveillance and public realm use.

The design has evolved following engagement with the Planning Authority through the Section 247 and Large-scale Residential Development (LRD) processes. The revised height, scale and massing of the proposal have been adjusted to respond to the prevailing urban context and are considered consistent with comparable schemes in the area.

Technical assessments including sunlight/daylight analysis, visual impact, and overshadowing reports confirm that the proposed development will not give rise to significant adverse impacts on the amenity of nearby properties. Where impacts occur, they remain within acceptable parameters for a centrally located, high-density brownfield urban site. The proposed PBSA units themselves will benefit from good access to natural light and internal amenity standards appropriate to their use. While the development will introduce a new built form to the immediate area, the architectural approach is designed to respect the evolving character of the inner city, where older and newer buildings of varying scale and design coexist. The proposal incorporates active frontages and improvements to the public realm, which are expected to contribute positively to the local streetscape and improve the quality of the surrounding environment.

In summary, the proposed student accommodation development makes use of a well-located brownfield site within an area of ongoing regeneration. It is in line with relevant planning policy at national and local levels, supports sustainable urban development, and provides accommodation in close proximity to a significant concentration of higher education institutions. The design approach reflects its context and aims to contribute to the wider transformation of the area in a considered and balanced manner.

Demolition

To accommodate the proposed development, the existing industrial/warehouse building in-situ is to be demolished, amounting to c. 2140m2. The existing building is a two-storey building, that features a modern red brick façade. The building is rectangular in shape, with a protrusion at the front to Blackpitts street, and three regular steps on the northwest elevation to Donoval Lane. We note again that the subject building is not a protected structure, and the site is not an ACA or a candidate ACA.

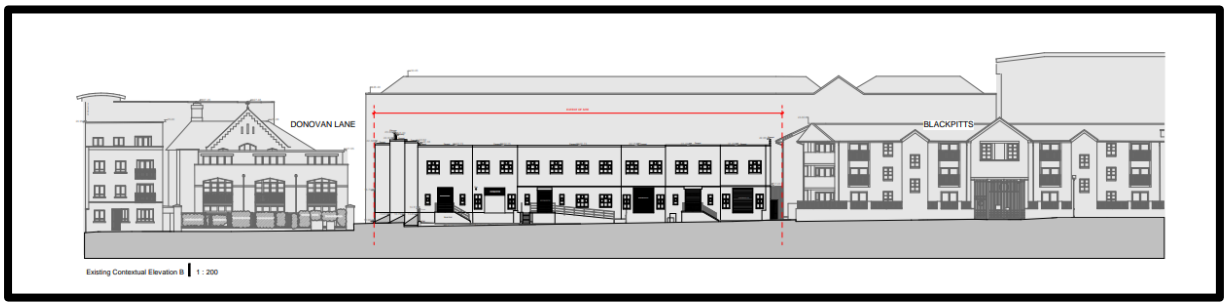


Figure 32: Existing Structure

Passive Dynamics have prepared a Demolition Justification Report which addresses the requirements outlined in Chapter 15, Section 15.7.1 of the Dublin City Development Plan 2022-2028 regarding the re-use of existing buildings. This study concludes that Scenario B (Demolish and Rebuild), provides the best results in terms of Whole Life Carbon over a period of 50 years both on a m2/bed space basis, unless when a decarbonised grid is considered, and the buildings are examined on a m2 basis. This is because from an operational point of view a completely new build will perform better in this instance.

Archaeological Impact

The site does not contain any protected structures or features above ground. The site lies within the zone of archaeological potential for the historic city (DU018-020), although there are no discrete recorded monuments within the red line boundary. The Archaeological Assessment prepared by Archaeology and Built Heritage Ltd notes the following:

"This assessment has examined the trajectory of historical settlement on the development site, where there is little likelihood that modern development has substantially truncated into underlying strata. The likelihood of there surviving archaeological deposits of significance at this location is nonetheless considered slim.

It is nonetheless recommended that the substrates under the existing slab be inspected as the ground is being broken out and that the footprints of the structures fronting Donovan's Lane are recorded under licence as an archaeological exercise.

It is also recommended that given the proximity of the Poddle, that the area to the front of the existing structure be test excavated to investigate for economic activity on the riverside which may predate the creation of the Abbey Stream."

Conservation Impact

As noted, there are no red-lined Conservation Areas (CAs) or Architectural Conservation Areas (ACAs) in the vicinity of the site. The nearest such area is Newmarket Square (CA) beyond the northern end of Blackpitts. The proposed development could have no impact on that area. There are however Z2 Residential Conservation Areas in the vicinity of the site, which could be affected by the proposed development.

The application is accompanied with an Architectural Heritage Impact assessment which concluded,

"There is no potential for the proposed development to have any direct physical impact on any structure of architectural heritage significance. Having walked the streets and roads in the area, it is

my assessment, as a conservation architect, that there is very little potential for visibility of the proposed development from within any Z2 Residential Conservation Areas and that there is little or no potential for impacts on the architectural heritage of these areas. There is potential of impacts on the setting of buildings on Hammond Street, St. John Street and St. Michaels Terrace…. The buildings on these streets are small and their architectural treatment and detail is very plain. They have very little architectural heritage significance".

Layout and Design

The application site is bounded to the north by Donovan Lane with residential units (St Kevin's Place), to the west is Blackpitts with residential development along the opposite site of the road (Greenville Parade), residential apartments to the south (Greenville Place) and a 4no. storey residential apartment block to east of the development (Greenville Place).

The scale and massing of the development has been re-assessed resulting in a reduced quantum of bedspaces (previously 250 at S247 stage and refined to 222no. at the LRD Opinion) now to 217no. In particular the 6th floor has been significantly reduced in extent. It now does not extend along the sixth floor has been removed in its entirety to address concerns related to scale, massing, and overall bulk. In addition, the massing along the Blackpitts frontage has been revised to strengthen the relationship with the adjoining residential properties and to further mitigate visual impact.

The below figure illustrates the design evolution of the proposal setting out how the scale and massing has been significantly, as the scheme progressed through the LRD process.

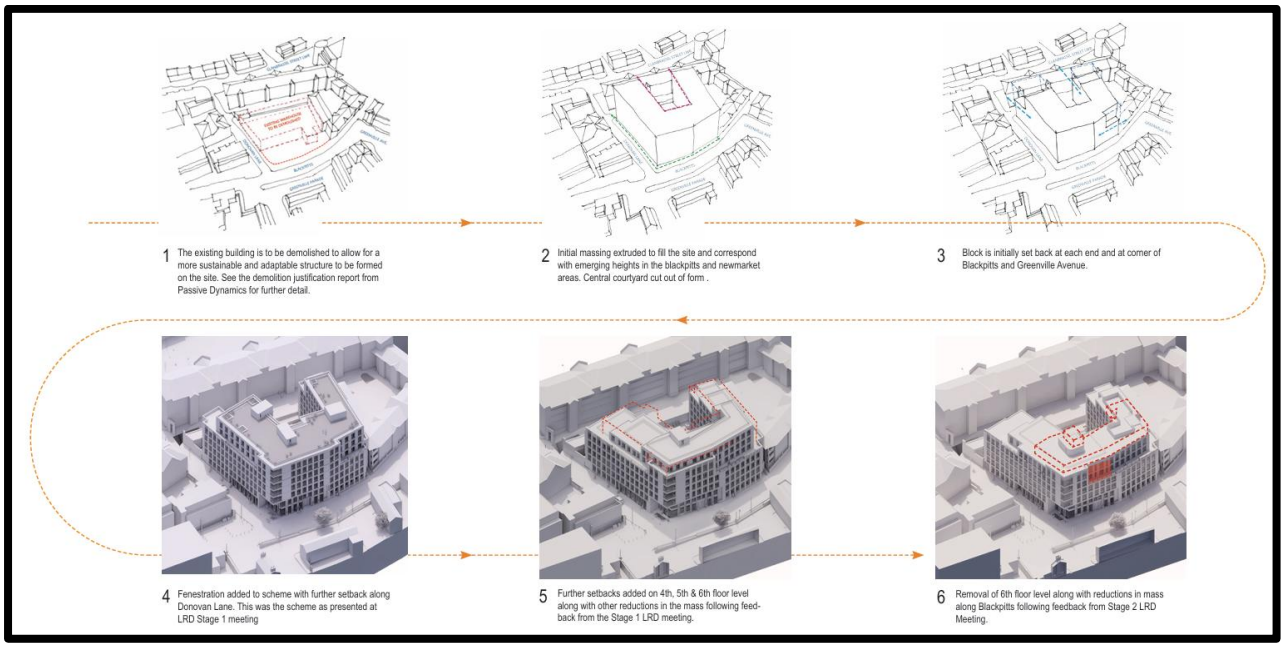


Figure 33: Design Evolution Through the LRD Process

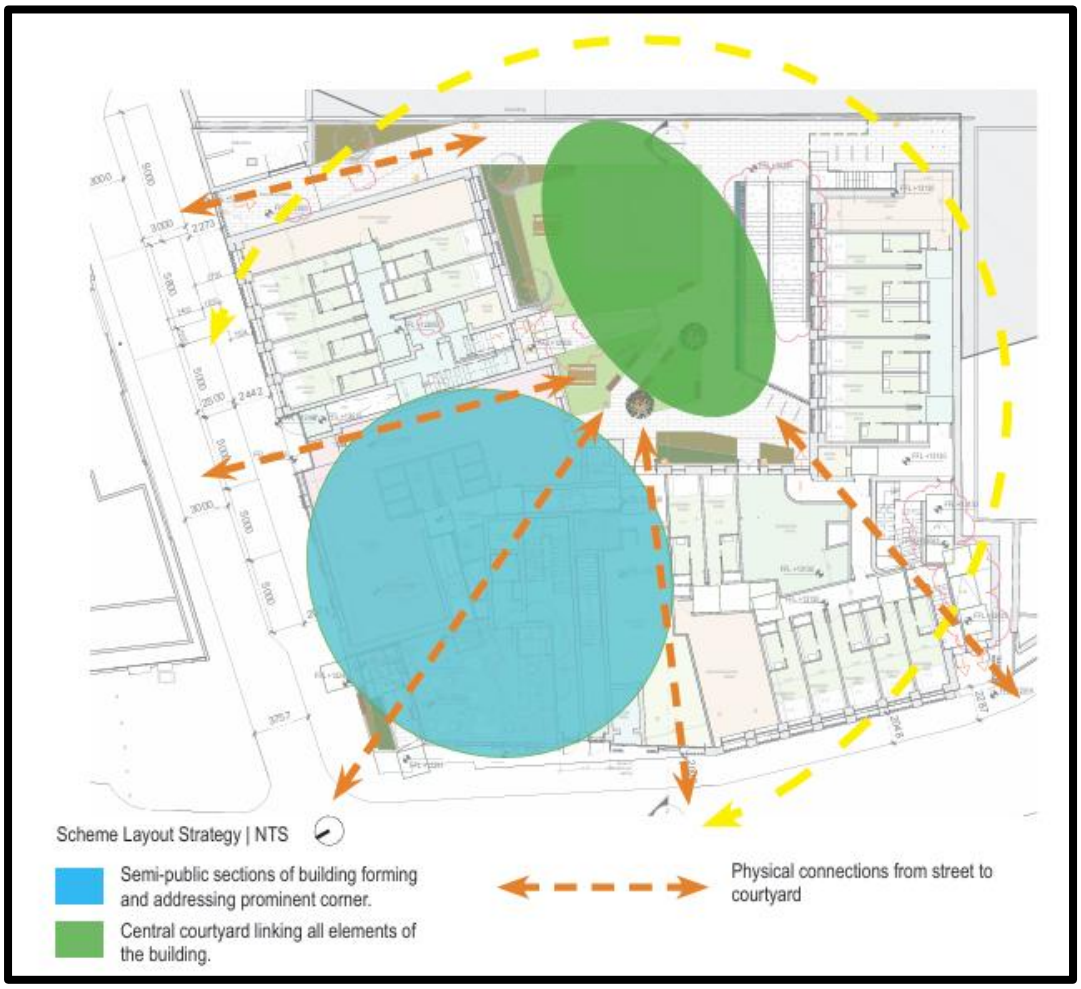


Figure 34: Proposed Layout Strategy

The building's main entrance is located on the corner of Blackpitts and Donovan Lane and is defined by a change in material and a two-storey setback in the elevation. This entrance leads to a reception and the central core of the building as well as the adjoining cafe-restaurant and library spaces with an exit out onto the central courtyard.

The courtyard at the centre of the scheme not only provides an invaluable amenity space for the students and a much-improved visual outlook for the neighbouring apartments but also acts as means of circulating between the various cores, linking and tying the whole development together.

Provision of Communal Amenity Space

The scheme is thoughtfully designed to bring together students from a variety of ages, courses, backgrounds, and cultures. By incorporating generous communal areas, the layout encourages interaction beyond individual house clusters or floors, fostering a wider sense of community.

A diverse range of shared amenities is proposed to promote wellbeing by encouraging resident interaction and a sense of belonging. These spaces are intended for relaxation, group dining, or collaborative work, effectively serving as extensions of residents' bedrooms. Acting as social hubs, they provide welcoming environments where students can meet friends, relax, or gather to watch

sporting events. Resident-led clubs can also convene here, and the space will host regular events organised by both staff and the students themselves.

The wellness benefits of these amenities are multi-faceted:

- Comfortable, accessible spaces beyond the private bedroom for everyday use.
- Dedicated quiet zones to support focused study and academic collaboration.
- Extensive landscaped outdoor areas for leisure and connection with nature.
- Most importantly, spaces that encourage social interaction and support mental health.
-

By offering such inclusive communal areas, the development helps residents connect, socialise, and build meaningful relationships—particularly important for those living away from home for the first time. The design deliberately integrates internal and external spaces to support this social and emotional wellbeing.

The operational team will curate a programme of events, while also empowering residents to initiate their own activities and form clubs around shared interests—whether that's running, painting, cycling, or cooking.

Additionally, a dedicated library and study space is provided to meet academic needs. It offers a quiet, comfortable alternative to working in private rooms or cluster areas, complete with free Wi-Fi and complimentary tea and coffee to support productive study sessions and group collaboration.

The proposed external communal open space provides c.673sqm predominantly at ground floor level within a central courtyard. This is landscaped to provide attractive spaces to relax, this space also provides a basketball practice hoop and seating areas. The scheme also provides a communal roof terrace for the enjoyment of the building's students.

The overall quantum communal amenity space provided is 1194 sqm exceeding the 1065 sqm required.

Figure 35: Proposed Ground Floor Layout Plan

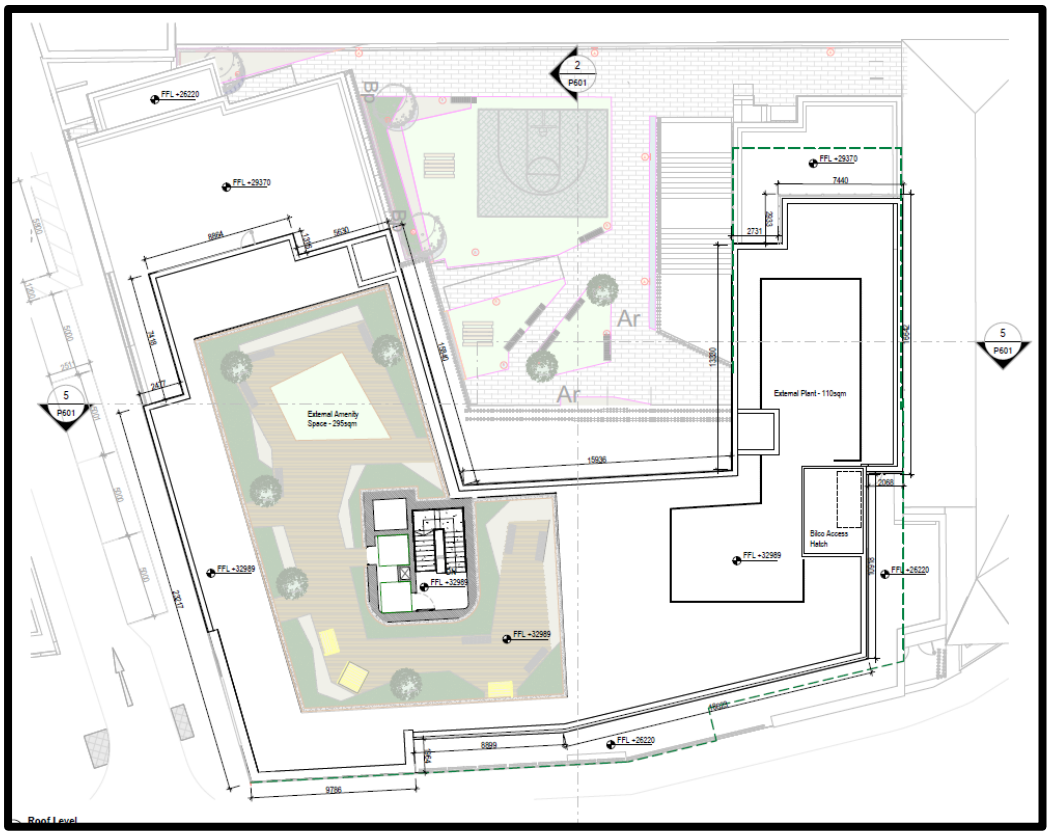


Figure 36: Proposed Roof Plan

Building Height, Design, Scale and Massing

The proposed building ranges in height up to 6 stories over basement. The design responds to the context of Blackpitts, Newmarket and Clanbrassil Road to inform the height and density. As set out in the Architectural Design Statement, neighbouring buildings revealed a predominant use of brick in various colours and tones, often complemented by banding, detailing, or sections of stone. The facade's design, overall structure, and choice of materials have been thoughtfully planned to accord with the surrounding architecture and local context.

As such, the proposed scheme primarily incorporates red brick, with red sandstone banding along the facade which forms a colonnade at street level. Key entrance points and public areas of the development are positioned at the corner of Blackpitts and Donovan Lane. This corner features a two-storey brick base at ground level, distinguished by green ceramic faience to set it apart from the rest of the building.

Throughout, windows feature green detailing to add visual interest and reduce the building's massing. The upper-level setbacks on the 4th and 5th floors introduce a contrasting material palette while maintaining a consistent architectural style. This approach ensures alignment with the established character of the local area.

Figure 37: Blackpitts Elevation - Two Storey Setback Facade and Green Faience defining Entrance Source: HRA Architects

Figure 38: Proposed Verified View no. 13 with Outline of Proposal at LRD Stage 2 illustrated in blue dashing.

Daylight, Sunlight and Shadowing

It is important to acknowledge that an overriding objective of both the NPF and the RSES, is the need to achieve ambitious targets for compact growth in urban areas. The Core Strategy of the Dublin City Development Plan 2022-2028 seeks to promote the delivery of residential development and compact growth on brownfield sites, stating that compact growth will be promoted throughout the city through appropriate infill development and consolidation of brownfield sites and targeted growth along key transport corridors.

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) in relation to daylight provision, states:

"In drawing conclusions in relation to daylight performance, planning authorities must weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision, against the location of the site and the general presumption in favour of increased scales of urban residential development. Poor performance may arise due to design constraints associated with the site or location and there is a need to balance that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution."

Model Works was commissioned to undertake a Daylight, Sunlight, and Overshadowing Assessment for a proposed large-scale residential development comprising 217 student bed spaces within a single block, rising up to 6 storeys with a basement level.

The assessment evaluates both the daylight and sunlight levels within the proposed development and the potential impacts on surrounding properties, in line with the BRE *Site Layout Planning for Daylight and Sunlight* (3rd Edition, 2022) and BS EN 17037 National Annex standards.

Proposed Development

Daylight:

In terms of daylighting all 245 habitable rooms within the development were assessed and 89% complied with the BRE Guide for Daylight illuminance. As states within the report, *"this is an excellent result for a higher density scheme on a compact brownfield site."*

Table 3 Daylight Provision Results Summary (BRE/BS EN 17037)

Room Type	Habitable Rooms	Rooms Meeting Criteria	Achieved Target (%)
All Rooms	245	218	89%

Table 10: Daylight Provision Results Summary (BRE/BS EN 17037)

Sunlight:

The proposed "U"-shaped building surrounds a central courtyard, with its southern side directly adjoining Grenville Place. As a result, lower floors cannot have south-facing windows, and upper floors exclude them to prevent overlooking. This limits access to optimal sunlight from the south. Instead, nearly half the rooms (47%) have predominantly north-facing windows, including those along Donovan Lane. Consequently, only 49% of all rooms meet the BRE guideline of 1.5 hours of sunlight on March 21. However, excluding the north-facing rooms, 92% of the remaining rooms meet the standard.

Amenity Areas:

The development provides two amenity spaces totalling approximately 628 sqm, a rear courtyard and a rooftop terrace (excluding courtyard at basement level which amounts to c. 45sqm). Both meet BRE sunlight criteria, with the rooftop terrace achieving 99% compliance and the courtyard 53%, aided by upper-floor setbacks and strategic placement of features to maximise sunlight.

Please refer to this assessment for a full breakdown of the sunlight exposure and % of Area Meeting Required level of Lux for the proposed development.

Daylight and Sunlight Impacts on Neighbouring Buildings

Four neighbouring buildings were assessed for daylight which include, 1 Hammond Street, St Kevin's Place, Greenville Parade and Greenville Place.

Daylight

Four neighbouring buildings were assessed for daylight, two had a Minor impact, one a Moderate and Greenville Place experienced a Major impact.

Table 11: Daylight Provision to Existing Buildings

Buildings	No of Windows Assessed	Meets BRE Criteria	Meets BRE Criteria %	Building Use	Impact Assessment
All Buildings	75	37	49%		
Individual Buildings					
1 Hammond Street	3	1	33%	Residential	Minor
Greenville Parade	10	2	20%	Residential	Moderate
St Kevin's Place	2	1	50%	Residential	Minor
Greenville Place	60	33	55%	Residential	Major

It noted that the baseline condition currently experienced by the surrounding buildings is very favourable with respect to daylight and sunlight, as the site is currently occupied by a two-storey warehouse of only c. 9m in height and a 16m deep surface carpark to the front.

Whilst the Daylight and Sunlight Assessment modelled the impacts on neighbouring buildings based on current site conditions; to reflect a more realistic urban environment, the modelling also included an additional assessment whereby mirroring that of the Greenville Place apartments on the proposal site, equidistant from the boundary.

When applying this supplementary assessment and "fair share" scenario, the report found that 92% of the assessed windows of Grenville Place would meet the BRE criteria, resulting in an impact assessment of Minor.

Buildings	No of Windows Assessed	Meets BRE Criteria	Meets BRE Criteria %	Building Use	Impact Assessment
All Buildings	75	60	80%		
Individual Buildings					
1 Hammond Street	3	1	33%	Residential	Minor
Greenville Parade	10	3	30%	Residential	Moderate
St Kevin's Place	2	1	50%	Residential	Minor
Greenville Place	60	55	92%	Residential	Minor

Table 12: Daylight Provision to Existing Buildings - Adjusted to include Typical Urban Block

Sunlight

A total of 76 windows were assessed for sunlight with 75% meeting the Annual Probable Sunlight Hours target and 92% meeting the Winter Probable Sunlight Hours target.

Buildings	No. of Windows	Meet APSH Criteria	Meet WPSH Criteria	Meet Both Criteria	Building Use	Impact Assessment
All Buildings	76	90%	93%	86%		
Individual Buildings						
1 Hammond Street	3	33%	100%	33%	Residential	Minor
Greenville Parade	10	100%	100%	100%	Residential	Negligible
St Kevin's Place	3	100%	33%	33%	Residential	Minor
Greenville Place	60	88%	95%	88%	Residential	Minor

Table 13 Provision to Existing Buildings - Adjusted to include Typical Urban Block

Amenity Areas

Three neighbouring amenity areas required a detailed assessment and all three easily meet the BRE criteria for sunlight on the ground.

Amenity Area	Area m^2	Area Receiving 2 Hrs of Sunlight - Existing %	Area Receiving 2 Hrs of Sunlight - Proposed %	Existing Vs Proposed	Meets BRE Criteria
01 Hammond St	59	12%	10%	86%	Yes
66A Clarence Mangan Rd	26	0%	0%	0%	Yes
St Kevin's Terrace	72	100%	100%	100%	Yes
Total Areas Meeting Criteria			**Yes**	**3**	**100%**
			No	**0**	**0%**
Total Amenity Areas Tested				**3**	

Table 14: Sunlight to Existing Amenity Areas Results Summary

Bin Storage & Servicing Arrangements

The position and capacity of the bin store has been designed to ensure that waste collections are frequent and at times of day that avoid disturbance to neighbours and the risk of odours from food waste.

1no. bin storage space has been provided within the development at basement level. This will be accessed via a service lift that exits in the courtyard. On collection days, the bins will be brought up to ground level to the service entrance where they will be collected by the selected service provider.

With regards to servicing, a 9m x 3m loading / drop off bay is included to accommodate the needs of the development.

Car and Cycle Parking

Car parking

As set out in the Atkins Réalis Consulting Engineering Report, the proposed provision of a new DAC parking space, a loading bay and the reconfiguration of the existing spaces are considered acceptable due to:

- nature of student accommodation,
- the site's inner city location,
- its proximity to City Centre providing a range of community, retail and other amenity facilities,
- and the site's proximity to high frequency public transport.

The set down spaces and loading bay, are provided along Donovan Lane, will provide space for servicing/deliveries/drop-off and pick-up of residents at term times. The bays are for short term parking only and no long-term car parking is provided. Please refer to the enclosed Traffic and Transport and Road Safety Audit by Atkins Réalis Consulting Engineers for further details.

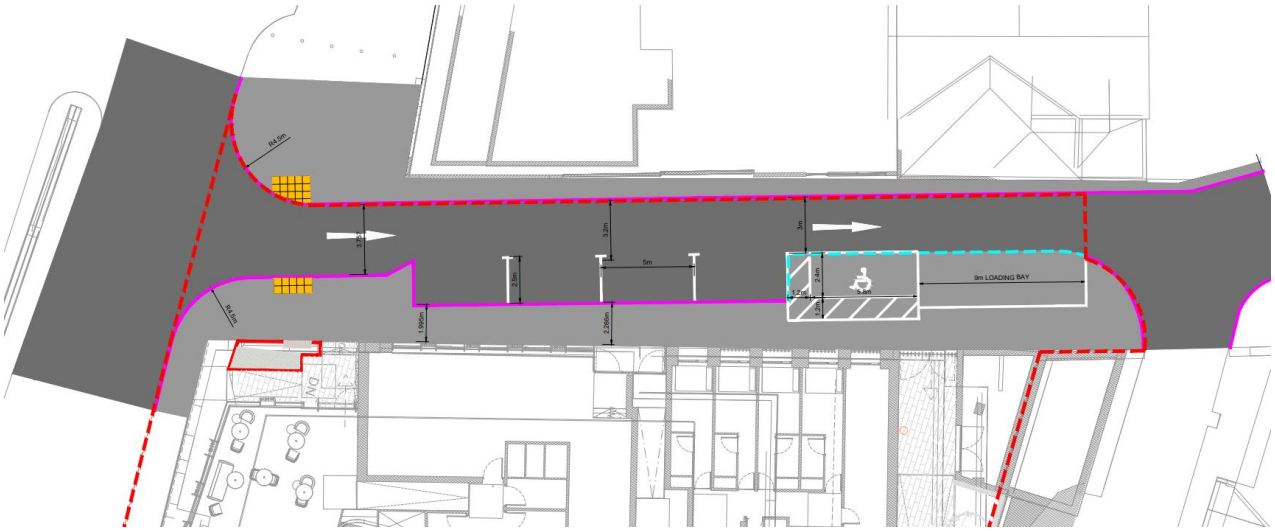


Figure 39:Proposed Parking Provision and Public Realm Works along Donovan Lane

Cycle parking

The proposed cycle parking is proposed to deliver 272no. spaces on site both in long- and short-term facilities. 5% is non-standard bicycle parking, the equivalent to 12 parking spaces, distributed across the site which is fully in accordance with the DCC Development Plan.

The 272 no. of cycle spaces, consisting of;

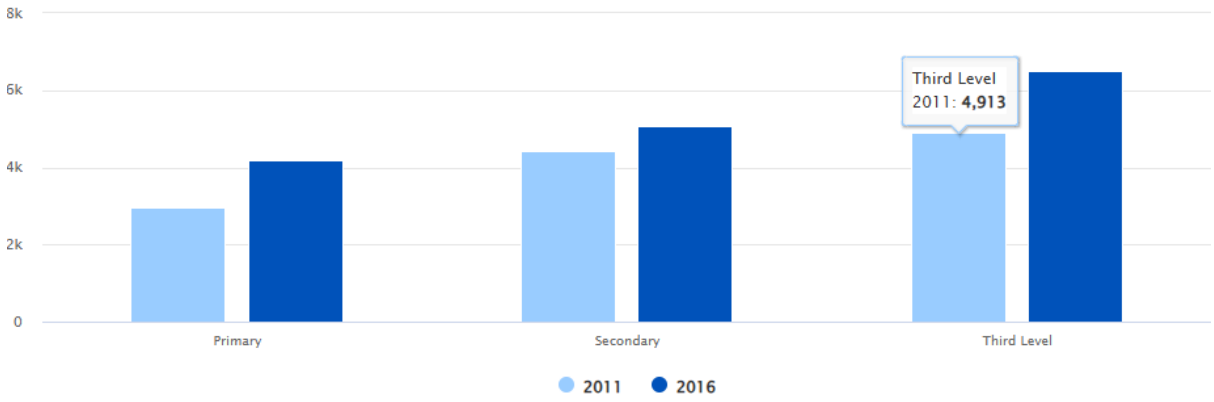
- 160 long-stay stacked spaces in basement
- 78 Sheffield stands (including 14 for staff) in basement
- 12 cargo/oversized spaces in basement
- 22 visitor Sheffield stands at surface level

In terms of accessing the site, pedestrian entry will be available through dedicated entrances on Donovan Lane and Blackpitts. A cycle lift from Blackpitts Lane will provide direct access to the basement for cyclists. Additionally, the service entrance on Donovan Lane will accommodate both pedestrian and cycle access to the inner courtyard. From there, access to the basement will be facilitated by "Bike Stair Ramps" installed on either side of the staircase.

As noted above this PBSA is located in close proximity to 8 No. of the largest universities and private institutions in the Country and considered to be highly suitable for student accommodation use. Future student residents of this development will have the choice of walking or cycling given the site's strategic inner-city location. This level of proposed cycle parking will provide options for students whether they chose to walk, cycle or use public transport.

Census analysis for Commuting in Ireland, dating from 2016 (this information has not been compiled for 2022 Census) demonstrates that the number of student cyclists is steadily increasing during each census period. Student Travel Patterns Census of Population 2016 – Profile 6 Commuting in Ireland - Central Statistics Office

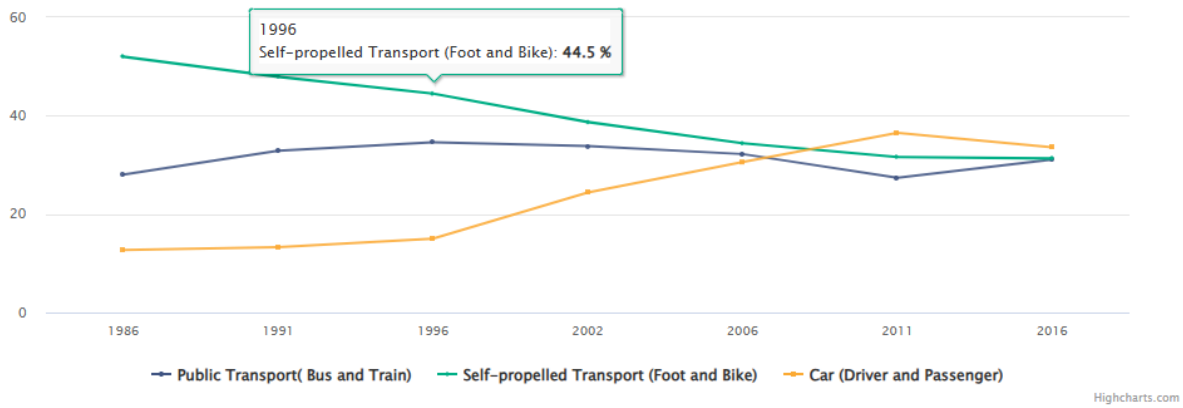
Figure 5.4 Dublin Student cyclists, 2011 - 2016



This analysis also demonstrates how student travel patterns to college have changed over a 30 year period since 1986. It is noted that students using car options has also increased in the same period, but this could be a reflection in the increase in students attending college who are now travelling greater distances daily from their family homes due to the price of student accommodation within the cities. Furthermore, the analysis found that those commuting by car, whether as a passenger or driver, fell by c. 2.9% in the 5-year period between 2011 to 2016. The proposed development will further enable this modal shift by:

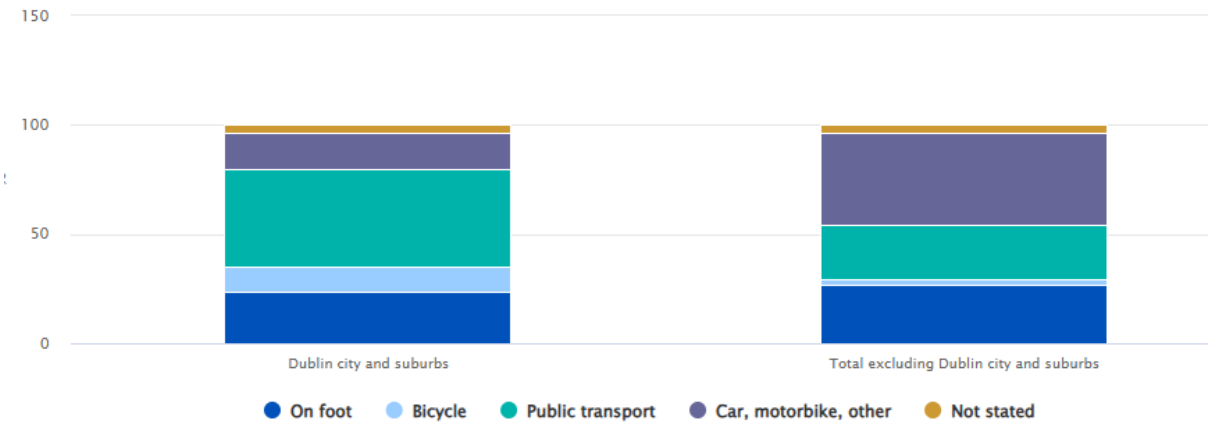
- providing affordable and accessible accommodation close to a large educational facility served.
- Providing a Mobility Management Plan to all student residents making them aware of the cycle facilities on site, the public transport availability and also the walking routes within the area.
- Forcing a modal shift by not accommodating car parking on site.

Figure 5.8 Modes of travel for college students 1986-2016



The study also demonstrates that reliance on public transport by students has remained relatively static over this period. Given this site's proximity to public transport, including bus and rail, it can be expected that this will be a preferred option for this site. Despite the drop in self-propelled transport the analysis found that walking "*was the most common method of travel to college, representing 1 in 4 (48,812 - 26%) third level commuters. This was followed closely by third level bus commuters, who at 24 per cent (45,943), represented an increase of 5,473 (13.5%) commuters on the 2011 figure of 40,470.*"

Figure 5.9 Means of travel for third level students, Dublin city and suburbs and elsewhere, 2016

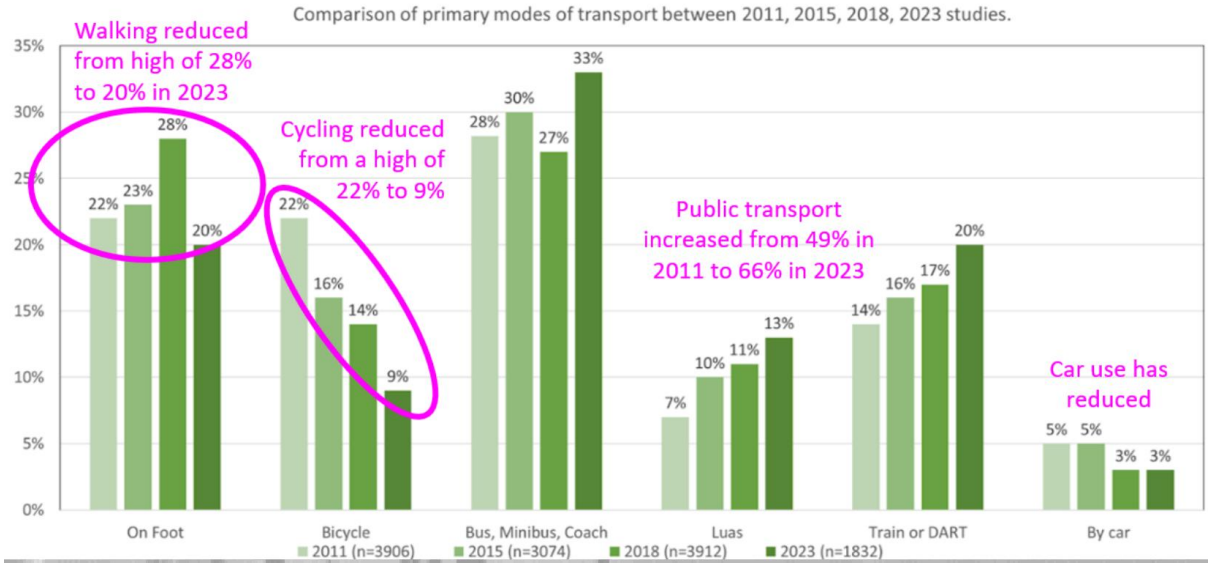


It is noted that within Dublin city and suburbs, the vast majority of students commute by public transport, followed by walking. 11.1% commute by bike and 16.5% commute by car, motorbike or other. This level of transport by private vehicle is significantly less than the 42.4% for students who are commuting from outside of Dublin city and suburbs. Therefore, this approach of reduced car parking is a reflection of the existing situation, in which the use of private vehicles to commute to third level is in the minority.

Trinity College Dublin have also been monitoring their students and staff mode of travel since 2011 as part of the Healthy Trinity Smarter Travel group (Living Lab - Healthy Trinity - Trinity College Dublin (tcd.ie)). This group has found that generally travel distances to college have increased, with people living within 4 to 10km of Trinity dropping by c. 16% in the 4 years since 2019. Again, this could be a

result of shortage of student accommodation, along with increasing prices for accommodation in these areas resulting in longer commutes for students.

This report also found that there was a drop in the number of people walking and cycling into college, as well as a decrease in the number of car trips. However, the reliance on public transport has increased. This increase in the need to travel by public transport could be attributed to the increased commuting distances removing the opportunity to walk or cycle. Again, this proposed student accommodation will address this need for the future student residents of this block given its proximity to a range of educational facilities within 30-40 minutes' walk or twenty minutes cycle of the site.



Engineering Services and Flood Risk

The proposed development has been assessed in relation to Sustainable Urban Drainage Systems (SuDS) and designed in accordance with DCC Development Plan and the UK SUDS Manual. The

proposed development shall incorporate a number of different SuDS components adapted to the local context ensuring that runoff is manged at source:

- The top most roof and lower terraces shall be a minimum of 70% Green and 100% Blue roofs, intercepting / treating the first 5mm of rainfall and also attenuating storm water.
- All paving in the central courtyard shall be permeable paving, intercepting /treating the first 5mm of rainfall. Even if the soil has poor infiltration some infiltration will take place in the stone below the areas and the overflow pipe will retain flow which will slowly infiltrate or evaporate.
- Soft landscaping shall allow interception / treatment. Soft landscaping shall also incorporate tree pits which provide long term SuDS benefits such as attenuating surface water and filtering out pollutants.
- 3 No SuDS tree pits are proposed for the development.
- Rainwater harvesting tank for irrigation of ground floor landscaping.

The Flood Risk assessment prepared by JBA Consulting Engineers and Scientists Limited found there are no historical records indicating any flood events at the subject site in recent times. The River Poddle is a culverted watercourse that runs adjacent to the western boundary of the proposed development. Based on review of the CFRAM flood maps, the site is classified within Flood Zone C, indicating a low risk of both fluvial and coastal flooding based on available flood mapping data, and is therefore excluded from further flood risk assessment at this stage.

Ecological Assessment

Appropriate Assessment

An Appropriate Assessment Screening Report prepared by Altemar Environmental accompanies this preapplication consultation. The report concluded that;

"It is considered that in combination effects with other existing and proposed developments in proximity to the application area would be unlikely, neutral, not significant and localised. It is concluded that no significant effects on Natura 2000 sites are likely as a result of the proposed development in combination with other projects. No in combination effects are foreseen. ***No projects in the vicinity of the proposed development would be seen to have a significant in combination effect on Natura 2000 sites."***

Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that the proposed development would not give rise to any significant effects to designated sites.

The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites."

Bat Fauna Impact Assessment

To accommodate the proposed development, the demolition of the existing building in-situ is required. As such, a bat survey was commissioned and carried out by Altemar Environmental which

accompanies this LRD Application. Site surveys were carried out 20th September 2024, 24th September 2024, 15th November 2024, & 07th July 2025.

The surveys concluded;

"No confirmed bat roosts will be lost. No trees of bat roosting potential are noted on site. The site is brightly lit by street lighting. The proposed development will change the local environment as new structures are to be erected. No bat activity was noted on site. No bat roosts or potential bat roosts will be lost due to this development. The potential for collision risk and impact on flight paths in relation to bats is considered low due to the low level of bat activity on site and the buildings would be deemed to be clearly visible to bats. The proposed development will have a neutral long-term impact on bat populations."

Statement of Response to S247 Comments by Dublin County Council

An S247 Pre-Planning meeting took place with Dublin Council (SDCC) on 27th August 2024 online via Teams. The following items were discussed and the response by the design team is set out below.

Dubin County Council comment	Applicant response
Planning	
Scale & massing of proposed building.	The scale and massing of the development has been re-assessed resulting in a reduced quantum (222 bedspaces, previously 250) and scale of development. In particular the 6th floor has been significantly reduced in extent. It now does not extend along the two wings and has also been set back from the main Blackpitts elevation. The building has also been recessed at 4th to 6th floors at the southwest boundary with the existing Greenville Avenue apartment block. The entire southern wing has been set back to the eastern boundary with the Clanbrassil Street apartments. A comprehensive set of verified views (13 no.) from various vantage points in the vicinity of the site is provided. These illustrate the visual impact of the development. From a number of locations to the east, north and south the scheme will not be visible or only partially visible. The development will be considerably screened by existing developments when viewed from vantage points along Clanbrassil Street Lower, St Vincents Street South and Lombard Steet West to the east and southeast of the site. From vantage points to north-west, west and south-west the development will be visible, and highly visible in a number of cases. This is to be expected given the specific setting west of Blackpitts where a number of residential streets with 1-2 storey terraced houses exist. It's important to note that these streets are generally perpendicular to Blackpitts and most of the houses face north south and don't interact with the Blackpitts streetscape.

	Furthermore, the 4 houses at Greenville Parade that do face Blackpitts are set back c.13m from same and with Greenville Parade elevated and set behind a retaining wall with railing and street tree. The development will form a significant new insertion into the streetscape and setting of the area. Whilst prominent, the visual impact will not be exceptional when considered within its inner-city context where modern and historic developments of varying forms and scales converge on the same and adjoining streets. In particular the impact on the Z2 residential conservation area to the south-west comprising Clarence Mangan Road, Greenville Avenue and Raymond Street is not considered incongruous or atypical within Dublin City and the planning documentation notes similar developments in the area in this regard. Overall, the development is considered in compliance with the zoning and development objectives for the site and the local area, and which will deliver an appropriate use on an highly accessible and well serviced site close to the city centre centre and a number of third level institutions. The development will also physically and visually improve the streetscape of Blackpitts at this location and will bring additional life, animation and footfall to the area within a well-considered architectural design.
All rooms should be compliant with standards. Floor plans and layouts are required with details of furniture proposed in living spaces and bedrooms. Bedspaces must be included in the planning application as this will have a knock-on effect in terms of open spaces / guidelines requirements for K/L/D spaces.	We refer to the Housing Quality Assessment and Schedule of Accommodation which demonstrate compliance with the relevant student accommodation standards. There are also floor plans and typical plans for each of the 34 clusters proposed. All standards are met for internal rooms and also for open space provision quantifiable based on number of bedspaces.
Conservation	
Demolition of existing building.	Passive Dynamics have prepared a Demolition Justification Report which addresses the requirements outlined in Chapter 15, Section 15.7.1 of the Dublin City Development Plan

	2022-2028 regarding the re-use of existing buildings.
Residential Amenity	
Require daylight and sunlight study.	A comprehensive Daylight & Sunlight Report by ModelWorks has been completed. This demonstrates that the proposed development will provide good levels of daylight and sunlight within the development and will not significantly impact neighbouring properties. In terms of daylight provision, it is noted that the report concludes that, *"this is an excellent result for a higher density scheme on a compact brownfield site."*
Drainage	
SuDS is welcomed and surface water requirements are more stringent in the Development Plan. Green and blue roof is required. Basement Impact Assessment. SSFRA.	Drainage has been designed in line with the Development Plan and and standard DCC water services requirements. Extensive blue/green roofs are proposed as detailed by JJ Campbell Engineers. A Basement Impact Assessment prepared by Ayesa is also submitted and which outlines a number of measures to be incorporated including retaining walls and localised propping when constructing the basement. A SSFRA prepared by JBA Consulting is also submitted and which concludes that the site is in Zone C and that the proposed use is suitable for this site and without the need for the Justification Test.
Transport	
Cycle parking is acceptable and in line with appendix 5, table 1. Details on types of bikes stands proposed is required.	268 cycle parking spaces are provided within the scheme. This is considered an acceptable provision given the highly accessible inner-city location and its proximity to the City Centre and high-quality public transport provisions.
Parks	
Landscape Masterplan will be required. AA Screening	A landscape masterplan by JBA is submitted with this application. An AA Screening has been submitted with this pre-application request.

Statement of Response to Dublin County Council Opinion

A Section 32C pre-planning consultation meeting with Dublin City Council took place on the 17th January 2024 via Microsoft Teams. Following on from this, Dublin Council issued an Opinion under Section 32D. This opinion advised that the '*the submitted particulars alone and in their present form do constitute a reasonable basis for making an LRD planning application, subject to further consideration and amendment based on the recommendations and assessment contained in this report'.*

This Stage 2 information has been assessed against Section 32D(2) of the Planning and Development Act 2000, as amended, no issues are raised in respect of the documents submitted.

In accordance with Article 16(A) of the Planning and Development Regulations 2001, as amended, in addition to the requirements as specified in Articles 20A, 22 and 23, the following information should be submitted with any LRD application for permission'.

Dubin County Council comment	Applicant response
Planning	
a) The Planning Authority raise concern regarding the height, scale and massing of the building and the undue negative visual impact of the proposal on the wider vicinity of the site. A reduction in height and massing should be explored given the site context, the infill nature of the site & Z1 zoning of the site.	In response to the feedback received during the LRD Stage 2 meeting and the subsequent opinion issued, the sixth floor has been removed in its entirety to address concerns related to scale, massing, and overall bulk. In addition, the massing along the Blackpitts frontage has been revised to strengthen the relationship with the adjoining residential properties and to further mitigate visual impact. The LRD planning application is accompanied with a Townscape and Visual Impact Assessment prepared by Modelworks, which assessed the potential townscape and visual impacts of a proposed student accommodation development on a site at Blackpitts and Donovan Lane. The report found, the receiving environment has been assessed as having medium townscape sensitivity, meaning it contains some valued elements but generally features a mixed or weak character with potential for change or improvement. The site is an underutilised brownfield plot in the city centre, currently occupied by an unsightly 20th-century warehouse/office building. This building detracts from the character and visual amenity of the surrounding streetscapes and offers no active street frontage, presenting a dead edge to Blackpitts and Donovan Lane.

	The site is zoned as Z1 'Sustainable Residential Neighbourhoods', which encourages high-quality, well-connected housing developments with good access to public transport, open space, and local services. The surrounding townscape is varied in age, use, and scale, featuring both modern, high-density mixed-use developments to the east and older, lower-scale Victorian housing to the west. The contrast in character and building types highlights the opportunity for redevelopment to better integrate the site into its urban context, enhance the public realm, and support sustainable neighbourhood growth. The application is accompanied with an Architectural Heritage Impact assessment which concluded, *"There is no potential for the proposed development to have any direct physical impact on any structure of architectural heritage significance. Having walked the streets and roads in the area, it is my assessment, as a conservation architect, that there is very little potential for visibility of the proposed development from within any Z2 Residential Conservation Areas and that there is little or no potential for impacts on the architectural heritage of these areas. There is potential of impacts on the setting of buildings on Hammond Street, St. John Street and St. Michaels Terrace…. The buildings on these streets are small and their architectural treatment and detail is very plain. They have very little architectural heritage significance".*
b) Images 10 & 12 of the submitted visualisations show the significant impact of the proposal on the receiving environment. The Applicant is requested to submit further CGIs / photomontages of the proposal viewed from opposite the site on Greenville Parade.	Noted. Please refer to Verified View locations no. 15, 14, 12, and 10 which provides views of the proposed development as viewed from Glenville Parade and viewpoints directly adjacent to Glenville Parade.
c) The Planning Authority has serious concerns regarding the overbearing impact the proposed building would have given its scale and bulk in close proximity to neighbouring sites. While the small set back at the front southern corner and slightly reduced element is welcomed, it does not go far enough to address the concerns. A further reduction should be explored which extends across the entire building.	The proposed development along Blackpitts has undergone a significant reduction in height through the complete removal of the sixth floor, directly addressing concerns raised within the LRD opinion. This reduction not only lowers the overall scale of the building but also contributes to a more contextually appropriate relationship with its neighbouring buildings.

	In addition to the height reduction, the massing along Blackpitts has been reconfigured to include a greater setback, effectively reducing the perceived bulk of the structure from the street level. These changes improve the visual impact of the proposal, ensuring it integrates more sympathetically with the existing townscape and enhances the streetscape character, particularly within this inner city location, between modern developments and the more historic residential areas.
d) The Planning Authority has serious concerns regarding the usability of the communal open space and given the time of year that students will be resident in this building (Sept – May) the fact that the open space does not meets the minimum 2 hours for 50% of the space in March and is shown to only in the summer months which will not benefit them.	Noted. External amenity spaces are now provided both at ground floor level within the central courtyard and at roof level via a communal terrace, delivering a combined total of 1,194m². This significantly exceeds the minimum standards outlined in the Dublin City Development Plan for a scheme of this scale. The design has also been refined to optimise sunlight access to these amenity areas. As a result, the proposed development fully complies with the BRE Guidelines for Sunlight to Amenity Spaces, achieving and exceeding the benchmark of at least two hours of direct sunlight over 50% of the area on March 21st. For further details, please refer to the accompanying Daylight and Sunlight Assessment.
e) The plot ratio and density remain concerning and a reduction should be explored to increase the overall quality of the scheme – infill development should complement the existing streetscape, respect and enhance its context and be well integrated with its surroundings.	Noted. The following the LRD Meeting, the Design Team has reduced the overall height, scale and massing of the proposed development. As a result, the scheme has been reduced from 222 Student Bedrooms to 213 Student Bedrooms i.e. 217 student bed spaces (209 single rooms and 4 twin rooms). As such the plot ratio and density have been reduced from 4.13 and 292uph to 3.95 and 285uph respectively.
f) Explore more active street frontage for the building and street animation; a. Access doors to restaurant on Donovan Lane in addition to internal access b. Explore reordering some ground floor bedrooms which face onto the public street with communal amenity spaces c. Increase passive surveillance through design and avoid long blank facades.	In response, the ground floor layout has been comprehensively revised to enhance active street frontage and promote street-level animation. Key changes include the provision of direct at-grade access from Donovan Lane to the restaurant, ensuring improved permeability and public engagement. Along Blackpitts, the internal configuration has been redesigned to increase street activation. Five bedrooms are now oriented toward the

	street, replacing the previous seven, which had limited engagement. Additionally, the cluster's Kitchen/Common Area now directly fronts Blackpitts, complemented by a Library/Study Area, Reception, and Common Area, all of which contribute to a vibrant and visually active frontage. The proposed ground floor plan also ensures consistent window openings along both Donovan Lane and Blackpitts, facilitating passive surveillance and reinforcing a strong visual connection between the building and the public realm.
g) The Applicant is requested to satisfy themselves that all documents are up to date and that all documents as set out in Section 15-1 Thresholds for Planning Applications are submitted at Stage 3. The following additions and amendments are submitted at Stage 3; a) Update Development Plan zoning map on page 5 of the Architectural Design Statement b) Additional CGIs of the building as reduced from the view point opposite the site – as viewed from Glenville Parade.	This is noted. Table 15.1 has been reviewed, and all relevant documentation has been provided. Please see the list of enclosures included with this application. The Architectural Design Statement has been updated reflecting Map E of the Dublin City Council Development Plan 2022-2028. Noted. Please refer to Verified View locations no. 15, 14, 12, and 10 which provide views of the proposed development as viewed from Glenville Parade and viewpoints directly adjacent to Glenville Parade.
Traffic and Transportation Matters	
The applicant is advised that the following points be addressed within the final LRD application documentation:	
1. Public Roads / Public Realm: a. As part of the development, the existing on-street parking arrangements adjacent to the application site on Donovan Lane and Blackpitts should be revised to accommodate the servicing and access needs of the development. The following revisions should be considered: i. Uncontrolled on-street parking adjacent to the site to be eliminated, in accordance with Objective SMTO23 of Chapter 8 of the Dublin City Development Plan, 2022-2028. Can be partially achieved through re-location of controlled on-street parking spaces from Donovan Lane to Blackpitts.	Associated public realm improvement works along Donovan Lane and Blackpitts, including alterations to the existing footpaths/public road, provision of 5no. set-down spaces (including 1no. DAC-compliant space) and 1no. loading bay along Donovan Lane. The set down spaces and loading bay, are provided along Donovan Lane, will provide space for servicing/deliveries/drop-off and pick-up of residents at term times. The bays are for short term parking only and no long-term car parking is provided. Please refer to the enclosed Traffic and Transport and Road Safety Audit by Atkins Réalis Consulting Engineers for further details.

ii. At least 1no. on-street accessible parking space to be provided.	An accessible space has been provided.
iii. A loading / drop-off bay sufficiently sized to accommodate the servicing needs of the development to be provided on Donovan Lane, including setback of development as required to ensure clear footpath / carriageway widths are maintained.	A 9m x 3m loading / drop off bay is included to accommodate the needs of the development on Donovan Lane, with a minimum of 2.2m footpath maintained.
b. Pedestrian footpaths adjacent to the site on Blackpitts and Donovan Lane should achieve a continuous minimum clear width of 2m to allow for free pedestrian movement in accordance with the standards of the Design Manual for Urban Roads and Streets (2019).	Footpath design shall be in accordance with the document Construction Standards for Roads and Street Works in Dublin City Council.
i. Footpath design should be in accordance with the document Construction Standards for Roads and Street Works in Dublin City Council.	
ii. It should be clearly demonstrated that there is no overhang, projection or foundation piling impact on the 2m wide footpath.	No overhang or projection into footway that would reduce width.
c. The applicant should provide a map delineating those areas to be taken in charge by the Local Authority.	Please refer to taking in charge plan issued by Atkins Réalis Consulting Engineers.
d. The applicant is required to prepare a response to SMTO10 (Walking and Cycling Audits) and the sustainable and efficient movement design criteria under Appendix D of the Sustainable and Compact Settlement Guidelines 2024.	A Walking and Cycling Audits provided within the AtkinsRéalis pack.
2. Access and Servicing:	
a. The applicant should submit autotrack analysis for all vehicular access requirements, including emergency services (ambulance and fire tender).	Autotrack drawings provided, reference 0114189-ATK-XX-XX-CE-SK-950002 Vehicle Tracking - Private Car and 0114189-ATK-XX-XX-CE-SK-950001 Vehicle Tracking - Fire Tender.
b. The applicant is required to submit a Service and Access Strategy for the development.	A 9m x 3m loading / drop off bay is included to accommodate the needs of the development. In terms of accessing the site, pedestrian entry will be available through dedicated entrances on Donovan Lane and Blackpitts.
i. The Strategy should demonstrate whether the provision of new on-street loading / drop-off facilitates adjacent to the site, in conjunction with existing on-street loading facilities in the	A cycle lift from Blackpitts Lane will provide direct access to the basement for cyclists. Additionally, the service entrance on Donovan

vicinity, would be sufficient to accommodate the servicing needs of the development. ii. The Strategy should address servicing requirements for the proposed café / restaurant unit and internal communal amenities c. An Operational Waste Management Plan shall be submitted.	Lane will accommodate both pedestrian and cycle access to the inner courtyard. From there, access to the basement will be facilitated by "Bike Stair Ramps" installed on either side of the staircase. An Operational Waste Management Plan is submitted with this LRD application. With regards to Move-in and Move-out days, student check-in usually takes place over two weeks at the beginning of the academic term. In addition to the principal intake weekends, a proportion of students, particularly those travelling from overseas, will arrive on an ad hoc basis during weekdays. Students will be advised of their arrival time slot, to stagger arrivals throughout the weekends. • For the key weekends, the flow of new residents moving in will be managed by: • Bringing in additional staff to manage traffic. • Providing a specific time slot for arrival and check-in. • On arrival, students will be given a set period for unloading. • The site-based team will control traffic onto and through the site to ensure students, parents/helpers move through in less than an hour. • Trolleys will be hired to assist parents/helpers and students move luggage from the check-in area into the building. • As the student accommodation will be fully furnished, a reduced amount of luggage and personal belongings will be required. Student move-out is not so time-constrained as individual university courses finish at different times. Furthermore, many overseas students would be unlikely to return home for any significant time compared with Irish/UK students who may return to their family home during the holidays. Please refer to sections 2.09 and 2.10 of the Operational Management Plan by GAA for further information.

	An Operational Waste Management Plan prepared by Traynor Environmental accompanies this LRD application.
3. Cycle Parking: a. The applicant should provide details of e-charging facilities within the overall cycle parking provision. b. The applicant should identify dedicated cycle parking for staff of the development (including café / restaurant unit). i. Staff cycle parking shall be segregated to facilitate secure key / fob means of access for staff only.	The proposed cycle parking is proposed to deliver 272no. spaces on site both in long- and short-term facilities. 5% is non-standard bicycle parking, the equivalent to 12 parking spaces, distributed across the site which is fully in accordance with the DCC Development Plan. The 272 no. of cycle spaces, consisting of; - 160 long-stay stacked spaces in basement - 78 Sheffield stands (including 14 for staff) in basement - 12 cargo/oversized spaces in basement - 22 visitor Sheffield stands at surface level. 14no. staff cycle spaces are provided within a dedicated cycle facility.
4. Mobility Management: a. The applicant is required to provide a Mobility Management Plan (MMP) as part of the planning application. The MMP should address arrangements for move-in / move-out days, management and allocation of cycle parking within the development, and conveying of information to students regarding car parking availability in the area.	A Mobility Management Plan (MMP) prepared by AtkinsRéalis Consulting Engineers is submitted with this LRD application.
Drainage - Surface Water Management	
1. Flood Risk: a) The Site located in Flood Zone C – low risk of fluvial and tidal flooding, however some risk of pluvial flooding may exists. b) DCC's SFRA suggests that for this area flood risk is primarily linked to overland flow paths along the roads and recommends raising finished floor levels a minimum of 300mm above the surrounding road / pavement level. c) FRA prepared by JBA suggests that the ground floor levels should be raised a minimum of 150mm above the surrounding hardstanding areas. This is less than the DCC's SFRA recommended minimum freeboard of 300mm.	a) Noted. Please refer to section 3.2.3 and address in Section 4.2.2 of the accompanying Flood Risk Assessment, which provides full details regarding pluvial flood risk associated with the subject site. b) The flow paths in the area have been provided in Figure 4-1 and the associated freeboard is provided in 4.2.1. In some areas, the ideal freeboard of 300mm has not been achieved by a minor margin due to access and design restrictions. c) The maximum freeboard within the design constraints has been provided as part of the development. With reference to Sections 4.1 and 4.2.1, the freeboard within the

The site specific FRA should be revised to fully explain and justify the departure from the DCC's recommended freeboard. *(Whilst the FRA states that the provided minimum freeboard of 150mm is sufficient to protect the development from the predicated surface water flooding, this claim is not fully substantiated in the report.)* d) There appears to be at least 3 separate entrances from the street level to the basement. From the submitted it is no clear at what levels are these entrances set at and whether there is any risk of basement flooding through these access points. FRA should be updated to evaluate the risk of basement flooding through street level accesses, vent openings etc. e) FRA states that based on the LIDAR and topographical survey of the site and the surrounding environment natural flow paths will allow the flow of potential surface water to be channelled around and away from the site. This should be further demonstrated. A layout drawing incorporating topographical survey data and indicating pluvial flow paths around the perimeter of the site should accompany the FRA. (*Query: Donovan Lane Elevation drawing shows a localised low point at street level.*)	development has been provided. The majority of the site provides a freeboard of greater than or close to 300mm. A single entrance has a freeboard of 230mm, however based on the review or area topography Blackpitts Road only conveys surface water and does not retain waters adjacent to the site therefore, a 230mm freeboard is considered sufficient to minimise the flood risk to the development. d) Please refer to section 4.2.1 and specifically Figure 4-2 of the FRA which have been updated to provide the necessary FFL and external road levels. Flood risk to the basement level is undertaken and full detailed within section 4.2.3. e) Refer to figure 4-1 of the FRA which has been updated to confirm the surface water flow paths around the site which has been used in the assessment of flood risk in Section 4.1 and Section 4.2.2.
2. Surface Water Management: a) Engineering report notes that the development is unable to connect to 600mm dia public surface water sewer in Clanbrassil Street, which would be the preferred option. Invert of the sewer at Clanbrassil Street is too high to facilitate a gravity connection from the site. Only other option is to connect to the combined sewer network. b) Overall attenuation volume required is 97m3. Some of this will be stored in blue roofs and tree pits (57m3). c) Indicated surface water discharge rate from the site is 2l/s. d) Sustainable Drainage Systems (SuDS) include green and blue roofs, permeable paving some soft landscaping and tree pits. Incorporation of a range SuDS measures and in particular green /	a) Noted. Please refer to the Engineering Services Report that provides full details of the surface water management. The subject application is accompanied with a COF (Confirmation of Feasibility) and Statement of Design Acceptance. b) The total attenuation required is 97m³, see attenuation calculations in Appendix 2 of Engineering Report. Stom water discharging to the Green and Blues roofs shall be attenuation on the roofs. Please refer to section 5.3 of the Engineering Services Report. c) This discharge rate has been achieved. Please refer to section 5.4 of the Engineering Services Report. d) Due to the complexity of the project, roof types, roof setbacks, podium suspended slab and complexity of the plumbing for a dual system, rainwater harvesting is not suitable for

blue roof at all roof levels is welcomed. Possibility of incorporating rainwater harvesting for blue roof areas should be explored. e) Comments on engineering drawings: Flow control manhole should include a pentstock valve as per the detail included in the Greater Dublin Regional CoP for Drainage Works. f) An extra manhole will be required at the sw outfall connection to the combined sewer to accommodate an intercepting trap to stop foul odour coming back up the line. g) Detail should be provided on the green / blue roof flow restrictor	internal use in toilets. But rainwater harvesting tank is suitable for irrigation and watering the planting within the central courtyard. It is proposed to install a 6m³ Kingspan AquaHarvest or similar rainwater harvesting tank with overflow to the attenuation tank at ground level. Please refer to section 5.6 of the Engineering Services Report. e) Noted. Manhole S02 has been amended to include a penstock, please see revised drawings C2 and C6 prepared by JJC. f) Noted. Extra manhole has been added, hydro-brake and broads-traps are in sperate manholes, please see revised drawings C2 and C6 prepared by JJC. g) In response, please refer to Appendix 6 of the Engineering Services Report for ACO blue roof flow restrictor details.
3. Basement Impact Assessment (BIA): a) BIA lacks site specific data. No site-specific ground investigation or groundwater monitoring have been completed on site recently to inform the report. Report is based mainly on desktop survey and historical ground investigations carried out on nearby sites in the past. The one exception is the dynamic probing carried out on site in 1991. Due to the lack of site specific information a number of assumptions had to be made which will need to be validated prior to the development goes to construction and the BIA will need to be updated. b) The following concerns shall be addressed: I. The retaining wall extents (Figure 5-1) do not align with the proposed basement footprint (Figure1-2). II. No details have been provided on the type of retaining wall proposed. The BIA also states that temporary propping will be required but no further details are provided. III. No details have been provided on the proposed basement foundations and the anticipated foundation design is inconsistent within the BIA and	a) Noted. No recent site investigations have been conducted for the proposed development. However, a historic investigation from 1991 remains relevant, as ground conditions are unlikely to have changed significantly. The six probes completed at that time are considered sufficient for a preliminary assessment to support the planning application. If planning permission is granted, a new intrusive site investigation will be undertaken to confirm ground conditions and inform the detailed design. b)i) Both figures have been updated based on the latest basement footprint drawings. b)ii) Section 5.3 has been updated to confirm that the proposed wall is an embedded secant pile wall, comprising two types: • WT01: Ground movement assessed for excavation in front of a low-stiffness secant pile wall. • WT02: At the southern boundary (adjacent to Nos. 78–83 and 83–89 Grenville Place), propping is required to limit wall and ground movements. As shown in Figure 5-1 (red line), the minimum prop stiffness at the pile head

Construction Management Plan. (The CMP states that the basement floor slab shall be a raft foundation supported on the black boulder clay, however, Section 4.3 of the BIA states that the proposed basement will be founded within the soft clay which has been estimated to a depth of 5.0m bgl.) IV. The BIA states that during construction, monitoring of the retaining wall system should be undertaken and, if required, monitoring of adjacent properties and structures should be carried out. No details of the monitoring regime (including trigger levels) are provided. V. The damage assessment identifies potential risk of slight damage (Category 2 on Burland Scale) to adjacent structures at No. 76-89 Greenville Avenue. However no specific mitigation measures are presented to reduce this. Details of proposed mitigation measures should be provided.	shall be k = 25,000 kN/m/m along the supported length. The pile wall is modelled as a high-stiffness secant wall in line with CIRIA C760. Final propping design will be completed at a later stage by others. b)iii) Section 4.3 of the BIA has been updated. Based on 1991 site investigations, the STIFF CLAY layer begins at 5.0m below ground level. Therefore, basement excavation will likely reach the overlying Soft CLAY stratum. If present at this depth, its low bearing capacity would rule out a raft slab and necessitate a piled foundation. This will be confirmed through further site investigations after planning approval, prior to detailed design. However, this does not affect the conclusions of the Basement Impact Assessment (BIA), as the formation level remains unchanged for both foundation options. b)iv) Ayesa have included a new section 5.9.1 in the BIA that includes details and minimum requirements for the monitoring regime. The section details trigger values for lateral movement of the secant pile wall to avoid inducing excessive damage to adjacent properties. Ayesa have also recommended that inclinometers are adopted to facilitate accurate movement monitoring of the pile wall during the basement construction stage. b)v) The ground movement modelling has been refined based on the inclusion of WT02 with temporary propping to limit movement of the pile wall during construction along the most sensitive interface with the adjacent properties as outlined in Section 5.2 and 5.3. Consequently, all the damage categories are Cat 0 to Cat 1 around the perimeter of the basement, which is considered acceptable. The addition of the props to Wall Type WT02 is considered as a mitigation measure. The results of which as presented in Section 5.0 of the BIA.
Archaeology	
The Archaeological Assessment (see Section 3.6 of the Framework and Principles for the Protection of the Archaeological Heritage,	Noted. Please refer to the Archaeological Assessment prepared by Archaeology and Built Heritage Ltd. which makes specific reference to

1999), should include referenced research and an analysis of the walled orchard (and associated house) depicted on 18th Century Rocque's map and the historic plotlines over time to present day.	and further research and an analysis of the walled orchard (and associated house).
Following assessment, the archaeology and heritage planning reports will require revision and should be reviewed by the Design Team. A detailed impact statement based on the final design should be submitted. It is noted that in the event of a grant of permission following submission of the final LRD application, a condition would pertain to provide for an Archaeological Assessment, including Archaeological Testing, to further assess the nature and extent of archaeological deposits prior to development and agree a suitable mitigation strategy such as preservation in situ and/or by record.	Noted. Please refer to the Archaeological Assessment prepared by Archaeology and Built Heritage Ltd. which concluded; *"It is likely that an archaeological condition attached to a successful grant of permission will require the excavation of test trenches after the standing structures are removed. Where there is a high probability of the survival at foundation level of the structures fronting Donovan's Lane, the design team should be cognisant of there being a further obligation to preserve by record any legible cultural material surviving. This will involve the hand-excavation of such material, an allowance for which should be made in the programme."*
Conservation	
a) It is important that the CGI views convey the impact that the new building will have on the existing neighbouring modest houses, and that sufficient 3D images are provided to facilitate a proper understanding of the proposed development within the receiving environment.	Noted. Please refer to Verified View locations no. 15, 14, 12, and 10 which provide views of the proposed development as viewed from Glenville Parade and viewpoints directly adjacent to Glenville Parade. The application is accompanied with a Townscape & Visual Impact Assessment prepared by Modelworks, to identify and determine the likely impacts of the scheme on the receiving environment, in terms of both townscape character and visual amenity. The TVIA should be read in conjunction with the verified photomontages which illustrate how the proposed development would appear from a variety of locations in the surrounding townscape.
b) It is suggested that the Applicant includes a section/elevation along Hammond Street indicating the eaves and ridge height of the 1 and 2 storey buildings and the side elevation of the end house on Greenville Parade, across Blackpitts and through the new building and the 4 storey buildings at the rear to demonstrate the difference in scale between the receiving environment and the proposed new building.	Noted. Please refer to proposed sectional drawings.

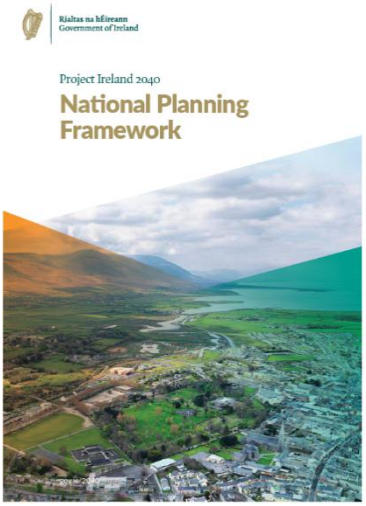
c) The exemplar included by the Applicant in their Architectural Design Statement page 16 of David Chipperfield's 11-19 Jane Street, New York is noted - 5 storeys would be much more preferable in this site context.	Noted. The subject building at 11–19 Jane Street is five storeys in height. However, as evidenced by the adjacent four-storey brick building, each floor within 11–19 Jane Street has significantly greater floor-to-ceiling heights. While 11–19 Jane Street presents as five storeys, a building of equivalent overall height could readily accommodate seven to eight storeys if designed with standard residential floor-to-ceiling heights, as seen in the adjacent structure. In comparison, the proposed scheme at Blackpitts has been designed as a six-storey building with more conventional floor-to-ceiling dimensions.
d) Recommended that at least 1 storey (preferably more) would be removed from the building to reduce the impact on the residential buildings in the area.	In response to the feedback received during the LRD Stage 2 meeting and the subsequent opinion issued, the sixth floor has been removed in its entirety to address concerns related to scale, massing, and overall bulk. In addition, the massing along the Blackpitts frontage has been revised to strengthen the relationship with the adjoining residential properties and to further mitigate visual impact. The revisions made directly respond to the comments raised in the LRD Stage 2 Opinion. The resulting scale, massing, and design have been carefully refined to ensure they are appropriate and contextually sensitive to the surrounding area. These changes are illustrated in the comparative plans, updated elevations, and Verified Image Assessments (VIAs) provided.
Other Documents required as outlined above	
The relevant required documentation as set out in Table 15.1 of the Dublin City Development Plan 2022 – 2028 Planning Application Documentation - Planning Thresholds shall be provided in addition to the specified reports requested above and as outlined in the applicant's Stage 2 Planning Letter.	This is noted. Table 15.1 has been reviewed, and all relevant documentation has been provided. Please see the list of enclosures included with this application.

Planning Policy Context

PROJECT IRELAND 2040: NATIONAL PLANNING FRAMEWORK

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland. The Eastern and Midland Region (including Dublin) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

The NPF Strategy includes the following aims:



- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

The NPF shifts Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located and requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope' through infill and brownfield development. The emphasis is on renewing and developing existing settlements and aims to prevent the continual expansion and sprawl of our cities. This aim for Compact Growth promotes "*Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport."* This approach not only makes better use of land but it can also have a "*transformational difference*" to towns and villages bringing new life and footfall to an area and contributing to the viability of services, shops and public transport, and by increasing the housing supply, enables more people "*to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less*" (Section 2.6).

As a result of this new policy approach, and as set out in Section 4.5 there is a recognition that infill and brownfield development is more challenging to deliver across multiple streams including land management and integration within existing communities who prefer the status quo to be maintained. Therefore, to enable brownfield development a flexible approach to planning policies and standards needs to be "*focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases… planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes*." In particular Section 4.5 highlights that "*general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.*" It highlights that there "*should also generally be*

no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five."

The implementation of the National Planning Framework aims "*to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas*" and also accommodate increased scale and height of development in our town and city cores, including an appropriate mix of living, working, social and recreational space. It has a number of directly relevant national policy objectives to this site that articulate delivering on a compact urban growth programme. These include:

- *National Policy Objectives (NPO) 2(a) relating to growth in our cities;*
- *NPO 3(a)/(b)/(c) relating to brownfield redevelopment targets;*
- *NPO 5 relating to sufficient scale and quality of urban development;*
- *NPO 6 relating to increased residential population and employment in urban areas;*
- *National Policy Objective 4*
  Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- *National Policy Objective 13*
  In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.
- *National Policy Objective 11*
  In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.
- *National Policy Objective 27*
  Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.
- *National Policy Objective 33*
  Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- *National Policy Objective 35*
  Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

We note that the NPF states that *"Demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas in particular. In the years ahead, student accommodation pressures are anticipated to increase. The location of purpose-built student accommodation needs to be as proximate as possible to the centre of education, as well as being connected to accessible infrastructure such as walking, cycling and public transport. The National Student Accommodation Strategy supports these objectives."*

EVALUATION OF CONSISTENCY

The subject site is located within a highly accessible urban location of central Dublin, which is identified for significant residential growth over the next two decades. The site is well connected to excellent public transport services, with both the Red Line Luas (Fatima Station, 20-minute walk or c. 1.2km as crow flies) and the Green Line Luas (Harcourt Street Station, 15-minute walk or c. 850m as crow flies). It is also within walking distance of a variety of bus routes operated by Dublin Bus. Dublin Bus Stop 2388 at St Kevin's Parade located 50 metres from the site provides links from the city centre to the site, and onwards through local suburban neighbourhoods towards Tallaght (No. 49 and 54a).

Bus Stop 1348 (Leonard's Corner Spencer Street South) is located c. 450m south east of the site located along South Circular Road, which is served by a total of 6no. bus routes, operated by Dublin Bus provides links from the city centre to the site, and onwards through local suburban neighbourhoods towards Drimnagh and Ballinteer.

The proposed development seeks to deliver a significant quantum of purpose-built student accommodation at a site that is located within a well-established area, and which is within walking distance of a multitude of services, exceptional public transport options and very good local amenities.

The subject lands which are a brownfield, infill and underutilised, situated within Dublin's inner city and notable proximity to the city centre, it is highly suited to provide a 6 No. storey over basement purpose-built student accommodation.

The proposed apartment development is considered in line with the Governments guidance for compact city development and ensures sustainable development in this well serviced suburban area.

REGIONAL SPATIAL AND ECONOMIC STRATEGY 2019- 2031

Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies. The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Mid-East Region - have been replaced by the Eastern and Midland Regional Assembly.

The RSES will support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP). It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change. The vision for the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.

To this end the RSES supports the consolidation and redevelopment of infill, and brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin city and suburbs.

EVALUATION OF CONSISTENCY

The subject development seeks to provides for a student accommodation development on a key urban infill site to increase densities, heights and urban consolidation in this inner-city location. The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.

URBAN DEVELOPMENT & BUILDING HEIGHTS: GUIDELINES FOR PLANNING AUTHORITIES, 2018

The Guidelines are intended to set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is a presumption in favour of high buildings at public transport nodes and state that it is Government policy to promote increased building height in locations with good public transport services.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their function. SPPRs as stated in the Guidelines, take precedence over any conflicting, policies and objectives of development plans, local areas plans and strategic development zone planning schemes.

The Guidelines emphasis the policies of the NPF to increase levels of residential development in urban centres and increase building heights and overall density by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála. It identifies the need to focus planning policy on *"reusing previously developed "brownfield" land, building up urban infill sites".*

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks:

"*In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors*".

It goes on to highlight that "*the preparation of development plans, local areas plan, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights*".

It encourages local authorities away from setting generic maximum height limits across their functional areas identifying "*such limits, if inflexibly or unreasonably applied, can undermine wider national policy objectives to provide more compact forms of urban development as outlined in the National Planning Framework and instead continue an unsustainable pattern of development whereby many of our cities and towns continue to grow outwards rather than consolidating and strengthening the existing built up area. Such blanket limitations can also hinder innovation in urban design and architecture leading to poor planning outcomes."*

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks.

"*In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors*". It goes on to highlight that "*the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights*".

The following summaries the compliance of the proposed development with the Development Management Criteria for assessing increased building height outlined in Section 3.2 of the Guidelines:

	Evaluation Of Consistency
SPPR 1 Support increased building height and density in locations with good public transport accessibility to secure the objectives of the NPF and RSES and shall not provide for blanket numerical limitations on building height.	The proposal of up to 6 storeys in an inner-city location, is served by excellent public transport. The area has extensive designated cycle lanes leading to each of the main academic institutions. The site is within walking distance of both the Red Line Luas (Fatima Station, 20-minute walk) and the Green Line Luas (Harcourt Street Station, 15-minute walk). It is also within walking distance of a variety of bus routes operated by Dublin Bus. Dublin Bus Stop 2388 at St Kevin's Parade located 50 metres from the site provides links from the city centre to the site, and onwards through local suburban neighbourhoods towards Tallaght (No. 49 and 54a). Bus Stop 1348 (Leonard's Corner Spencer Street South) is located c. 450m southeast of the site located along South Circular Road, which is served by a total of 6no. bus routes, operated by Dublin Bus provides links from the city centre to the site, and onwards through local suburban neighbourhoods towards Drimnagh and Ballinteer. The excellent sustainable transport options that the subject site has to offer gives a positive rationale for why the site can cater for increased height and density.
Development Management Criteria Section 3.2:	
At the scale of relevant city/town: -The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	

	The proposed development seeks to deliver an appropriate form and scale of residential development (student accommodation) at a site that is located c. 950m (as crow flies) to St Stephens Green Shopping Centre, and within c.850m of The Coombe Hospital. The site is well located with respect to a variety of existing leisure amenities, parks, playgrounds, and sports clubs are within a short walk or cycle of the site while including St Stephens Green.
At the scale of district/ neighbourhood/ street; - The proposal responds to its overall natural and built environment and makes a positive contribution. - The proposal is not monolithic and avoids long, uninterrupted walls of building. - The proposal enhances the urban design context for public spaces and key thoroughfares. - The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies.	The design carefully responds to the context of Blackpitts, Newmarket and Clanbrassil Road to inform the height and density. As set out above, a photographic survey of neighbouring buildings revealed a predominant use of brick in various colours and tones, often complemented by banding, detailing, or sections of stone. The facade's design, overall structure, and choice of materials have been thoughtfully planned to accord with the surrounding architecture and local context. The application is accompanied with an Architectural Heritage Impact assessment which concluded, *"There is no potential for the proposed development to have any direct physical impact on any structure of architectural heritage significance. Having walked the streets and roads in the area, it is my assessment, as a conservation architect, that there is very little potential for visibility of the proposed development from within any Z2 Residential Conservation Areas and that there is little or no potential for impacts on the architectural heritage of these areas.*
At the scale of the site/building: - Maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	As per design guidelines, the proposed student accommodation is provided on a 'cluster' type model which will be acceptable in terms of overshadowing and overlooking. This LRD application is submitted with a with a day/light sunlight assessment prepared by ModelWorks, which found that in terms of daylighting provision, the scheme achieved *"an excellent result for a higher density scheme on a compact brownfield site."*
Specific Assessments: -Specific impact assessment of the micro-climatic effects such measures to avoid/	The proposed development, while taller than the surrounding buildings, will not result in a new microclimate in the area due to the small nature of

mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered. -Development locations in proximity to sensitive bird/bat areas need to consider the potential interaction of the building location, materials and artificial lighting. -Relevant environmental assessment requirements.	the site. The immediately adjoining sites have building heights ranging from 1 to 5 storeys. It is noted that more recent developments within the area have building heights ranging up 7 and 8 storeys, New Mill Student Accommodation and Aloft Hotel respectively. The proposed development ranges in height up to 6 storeys, this is similar to the existing area and as such there will not be a cumulative impact on the development. As the site is currently a vacant brownfield there is low ecological value associated with the site.
SPPR 3 It is a specific planning policy requirement that where; 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise.	This proposal for student accommodation is in line with National Plan Policy to make the optimal use of zoned, serviced, vacant and accessible urban land which is appropriately located within the inner city and in very close proximity to the city centre, as well as to existing facilities such as shops and community facilities; major employment hubs and has exceptional public transport accessibility due to its proximity to the several bus routes, and the Luas. Given the above it is considered that the 6-storey proposal accords with the Urban Development and Building Heights Guidelines for Planning Authorities and can be granted in accordance with SPPR 3.

EVALUATION OF CONSISTENCY FOR BUILDING HEIGHT

Section 4.5.4 of Dublin City Development Plan deals with Taller Buildings as Part of the Urban Form and Spatial Structure of Dublin. In section 4.5.4.1 it acknowledges that the "*spatial approach to taller buildings in the city is in essence to protect the vast majority of the city as a low-rise city, including established residential areas and conservation areas within the historic core, while also recognising the potential and the need for taller buildings to deliver the core strategy*."

The graduated and set back heights compliment the design of the surrounding of the neighbouring properties and the varied nature of the buildings in the surround area. Given its highly accessible location and the surrounding area it is considered an appropriate site for higher development in line with Policy SPPR 3 of the Urban Development and Building Heights: Guidelines for Planning Authorities December 2018 and also supporting policy in the Apartment Guidelines and the National Development Plan. The development is of a similar height, bulk and scale to other schemes in the surrounding area.

Following 247 discussions with Dublin City Council, the overall massing of the scheme has been reduced, with setbacks incorporated into the building heights. The top floors of the student block have been set back reducing their visibility from the street and reducing the bulk of the building. These setbacks have the additional benefit of minimising overshadowing and overlooking to the surrounding properties.

Further height reductions have been proposed directly in response to the feedback received during the LRD Stage 2 meeting and the subsequent opinion issued, the sixth floor has been removed in its entirety to address concerns related to scale, massing, and overall bulk. In addition, the massing along the Blackpitts frontage has been revised to strengthen the relationship with the adjoining residential properties and to further mitigate visual impact.
In addition to the height reduction, the massing along Blackpitts has been reconfigured to include a greater setback, effectively reducing the perceived bulk of the structure from the street level. These changes improve the visual impact of the proposal, ensuring it integrates more sympathetically with the existing townscape and enhances the streetscape character, particularly within this inner-city location, between modern developments and the more historic residential areas.
These amended heights are considered to be fully in keeping with the proposals of the development plan and the character of this inner-city location.

SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS 2025

Section 5.0 of the Guidelines provides guidance on Shared Accommodation/Co-living Sectors and Purpose-Built Student Accommodation.

The Department of Further and Higher Education, Research, Innovation and Science is developing "The Design Guide for State Sponsored Student Accommodation 2025" to inform the approach to Student Accommodation. The Guide is an iterative framework that reflects best practices and supports the efficient delivery of state sponsored student accommodation. It is also intended, where appropriate, that the standards contained within the Guide can inform the planning and design of off-campus forms of student accommodation that are led by the private sector.

While adherence to the Design Guide is not a mandatory policy requirement, specific standards set out in the Design Guide are identified as being of particular importance from the perspective of providing appropriate flexibility for these typologies to be applied within the planning system.

Specifically, the Design Guide allows for the provision of single study bedrooms without the requirement for an en-suite bathroom, with a minimum required area of 8 sq.m for a single study bedroom and a minimum required area of 11.5 sq.m for a study bedroom incorporating an en-suite bathroom.

Policy/Objective	Statement of Consistency
Specific Planning Policy Requirement 8 (A) (i) There shall be no requirement or restriction in relation to the provision of en-suite bathrooms for single study bedrooms within Purpose Built Student Accommodation schemes.	Noted. Each unit is provided is provided with its on ensuite bathroom.
(ii) The minimum required area for a single study bedroom without en-suite facilities is 8 sq.m and the minimum required area for a single study bedroom with en-suite facilities is 11.5 sq.m; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR.	The proposed development exceeds these standards. A cluster type model is used within this development.
(iii) The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons are 3.6 sq.m and 3.3 sq.m per person, respectively; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR.	Please refer to the Housing Quality Assessment prepared by Horan Rainsford Architect's which sets out room sizes and confirms compliance with these requirements.
(B) Where any other requirement or restriction is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single student accommodation scheme.	Noted. The scheme fully accords with the Development Managements Standards set out within the Dublin City Council Development Plan.

EVALUATION OF CONSISTENCY

The proposed development is located in close proximity to 8 No. of the largest universities and private institutions in the Country and considered to be highly suitable for student accommodation use. The site is located within a 15-minute cycle of Trinity College Dublin, National College of Art and Design, Royal College of Surgeons, Griffith College, Dublin Business School, University College Dublin, TUD Grangegorman and NCI Ireland which had a total combined enrolment of 82,671 No. third-level students in 2023.

The subject site is a highly accessible location which benefits from high frequency public transport services. The site is also within short walking distance of the city centre core. It is a location where increased heights and densities of development are to be supported having regard to ministerial guidelines, as well as national, regional and local policy objectives, and have been as evidenced by a number of significant redevelopments that have occurred in the vicinity.

The proposed design has been well considered within the principles of significant brownfield regeneration. The proposal achieves a very high-quality architectural design with long lasting, durable material proposed. The layout, form and scale (including setting back of the top floor and other amendments) seeks to physically and visually integrate into the immediate urban setting whilst achieving a sustainable compact urban form that aligns with national and city planning policy for a brownfield city site.

SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENT, GUIDELINES FOR PLANNING AUTHORITIES, 2024

The Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Act in 2009, which in turn replaced the Residential Density Guidelines issued in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

It is intended that the Sustainable Residential Development and Compact Settlement Guidelines will be accompanied by a Design Manual that will provide best practice guidance on how the policies and objectives of the guidelines can be applied.

Section 1.3.2 of the Guidelines relating to Compact Growth state that *"priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out. There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens".*

Chapter 3 of the guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. Under this categorisation, as set out in Table 3.1 – Area and Density Ranges Dublin and Cork City and Suburbs, this site would be considered a City – Centre.

The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods[2], are the most central and accessible urban locations nationally with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. ***It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork.***

Section 3.4 provides further advice on *Refining Density* and includes a two-step process. Step 1: Consideration of Proximity and Accessibility to Services and Public Transport. This identifies that *while densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations. Densities above the ranges are 'open for consideration' at accessible suburban and urban extension locations to the maximum set out in Section 3.3.*

Table 3.8 (below) sets out definitions for terms used to define accessibility to allow for consistent application. The characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required.

High Capacity Public Transport Node or Interchange
• Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail[11], light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'[12] stop.
• Highest densities should be applied at the node or interchange and decrease with distance.
• 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.
Accessible Location
• Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.
Intermediate Location
• Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and
• Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.
Peripheral
• Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

[2] For example, the Dublin City Development Plan 2022-2028 refers to the inner city and its immediately surrounding neighbourhoods within the canals;

Section 3.2.1 provides a methodology to assist planning authorities in appropriately integrating national planning policy in relation to settlement growth and residential density into statutory development plans and in the assessment of individual planning applications. Footnote 3 states that *when calculating net densities for shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling.*

EVALUATION OF CONSISTENCY

Based off the calculation of four bed spaces accounting for one dwelling when calculating net density, the proposal would result in a density of c.285 units per hectare is considered appropriate at this location. The proposed development is considered highly accessible in terms of public transport and is located within Dublin inner city, within easy reach of Dublin city centre.

Overall, it is considered that the proposed student accommodation will provide a high-quality scheme in line with the Sustainable Compact Development Guidelines.

Section 4.4 Key Indicators of Quality Design and Placemaking Assessment

Key Indicators	Evaluation of consistency
Sustainable and Efficient Movement In order to meet the targets, set out in the National Sustainable Mobility Policy 2022 for reduced private car travel and increased active travel, it will be necessary to design settlements at every level to support the transition away from private car use and to support ease of movement for pedestrians, cyclists and public transport. Local authorities should plan for the development of well-connected neighbourhoods and a distribution of activities to ensure that day-to-day services and amenities are accessible within walking distance of homes and workplaces. In addition to sustainable travel objectives, this will ensure that settlements are vibrant, and when applied alongside the principles of Universal Design, will allow vulnerable users to move about and access services with ease. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.2 also refers): (a) New developments should, as appropriate, include a street network (including links through open spaces) that creates a permeable and legible urban environment, optimises movement for sustainable modes (walking,	Noted. The proposed development is considered highly accessible in terms of public transport and is located within an inner-city location. This proposed development creates an attractive, permeable urban environment.

cycling and public transport) and is easy to navigate. (b) New developments should connect to the wider urban street and transport networks and improve connections between communities, to public transport, local services and local amenities such as shops, parks and schools, where possible. (c) Active travel should be prioritised through design measures that seek to calm traffic and create street networks that feel safe and comfortable for pedestrians and cyclists. (d) The quantum of car parking in new developments should be minimised in order to manage travel demand and to ensure that vehicular movement does not impede active modes of travel or have undue prominence within the public realm. Chapter 5 Development Standards includes a specific planning policy requirement (SPPRs) that addresses car parking rates in new residential developments. The Design Manual for Urban Roads and Streets (DMURS) sets out statutory guidance and standards in relation to the design of individual streets and the use of traffic management and placemaking measures to manage traffic and promote safer and more vibrant streets (Section 2.3 refers). The application of DMURS in all new developments will be key to ensure that strategic movements are catered for along desire lines and that all street networks offer route choice and maximise the number of safe and attractive walking and cycle routes between key destinations. The application of DMURS is key to ensure sustainable mobility and the creation of high quality and attractive settlements. Local Authorities should also consider preparing active travel plans or sustainable mobility plans that focus on improving ease of movement in established areas to important destinations such as schools, parks, shops and public transport. This can be of particular benefit where a new transport service or new destination such as a school is proposed	The proposal also has ease of access to existing local services. The provision of a high ratio of cycle parking will encourage a modal shift to active travel. Cars are wholly eliminated within the development in line with this policy. The proposal has been designed in accordance with DMURS. Please refer to DMURS Statement prepared by AtkinsRéalis that accompanies this LRD application. A Walking and Cycling Audits provided within the Atkins Réalis pack.
Mixed and Distribution of Uses These Guidelines promote a move away from segregated land use areas (residential, commercial and employment) that have reinforced unsustainable travel in favour of	Noted. The proposed use is fully in accordance with the Z1 'Sustainable Residential Neighbourhoods' zoning on this site and seeks to provide for intensification of use of a

mixed-use neighbourhoods. Ensuring that there is a good mix and distribution of activities around a hierarchy of centres has many benefits in terms of reducing the need to travel and creating active and vibrant places. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.3 also refers): (a) In city and town centres and at high-capacity public transport nodes and interchanges (defined in Table 3.8), development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development. (b) In city and town centres, planning authorities should plan for a diverse range of uses including retail, cultural and residential uses and for the adaption and re-use of the existing building stock (e.g. over the shop living). It is also important to plan for the activation of outdoor spaces and the public realm to promote more liveable city and town centres. Much of this can be achieved though the implementation of urban enhancement and traffic demand management measures that work together to free up space for active travel and create spaces that invite people to meet, mingle and dwell within centres. (c) In areas that are less central, the mix of uses should cater for local services and amenities focused around a hierarchy of local centres that support residential communities and with opportunities for suitable non-residential development throughout. (d) In all urban areas, planning authorities should actively promote and support opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under-used lands (including for example the repurposing of car parks at highly accessible urban locations that no longer require a high level of private car access).	brownfield site by replacing a vacant commercial premises and will provide student accommodation which is wholly compliant with this policy. The site is in a highly accessible inner-city location and area for students to interact with the city centre. The nearest pair of bus stops to the site are approximately 150m away (bus stop 2635 Warrenmount Lombard Street West). The 54A and 49 routes both depart from these stops and connect the development to Tallaght and Trinity College. Student residents at Blackpitts will be able to travel to Trinity College in approximately 15 minutes via these routes. Bus Stop 1348 (Leonard's Corner Spencer Street South), is located c. 450m south east of the site located along South Circular Road, which is served by a total of 6no. bus routes, operated by Dublin Bus provides links from the city centre to the site, and onwards through local suburban neighbourhoods towards Drimnagh and Ballinteer. The proposal will replace a vacant commercial premise assisting in the regeneration and revitalisation of the existing area, enhancing the appearance of the locality.

(e) It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport. (f) The creation of sustainable communities also requires a diverse mix of housing and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can facilitate compact growth and provide greater housing choice that responds to the needs of single people, families, older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible. Development plans may specify a mix for apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment.	
Green and Blue Infrastructure Green and Blue Infrastructure (GBI) is a strategically planned network of natural and seminatural areas designed and managed to deliver a wide range of ecosystem services, while also enhancing biodiversity. Ecosystem services include water purification, enhancing air quality, space for recreation and climate mitigation and adaption. In settlements, GBI includes features such as rivers and canals, coastline and coastal habitats, green spaces (including parks), Nature-based Solutions and amenity sites that deliver ecosystem services and contribute to healthy, low carbon, resilient and connected settlements and places. National Planning Objective 58 of the NPF requires integrated planning for Green Infrastructure and ecosystem services as part of the preparation of statutory land use plans. Development plans should include (or be informed by) a Green and Blue Infrastructure Strategy and include objectives for the conservation, restoration and enhancement of natural assets and GBI networks. These objectives can be refined further in local statutory plans and guidance documents in response to local circumstances. The following key principles should be applied in the preparation of local plans and in the preparation and consideration of individual planning applications, (Figure 4.4 also refers):	We refer to the Civil Infrastructure Report prepared by JJ Campbell & Associates. SuDS measures are included throughout the development as set out in the JJ Campbell & Associates Engineering reports well as within JBA Landscape Rationale. The proposed development has been assessed in relation to Sustainable Urban Drainage Systems (SuDS) and designed in accordance with DCC Development Plan and the UK SUDS Manual. The proposed development shall incorporate a number of different SuDS components adapted to the local context ensuring that runoff is manged at source: - The top most roof and lower terraces shall be a minimum of 70% Green and 100% Blue roofs, intercepting / treating the first 5mm of rainfall and also attenuating storm water. - All paving in the central courtyard shall be permeable paving, intercepting /treating the first 5mm of rainfall. Even if the soil has poor infiltration some infiltration will take place in the stone below the areas and the overflow pipe will retain flow which will slowly infiltrate or evaporate. - Soft landscaping shall allow interception / treatment. Soft landscaping shall also incorporate tree pits which provide long

(a) Plan for the protection, restoration and enhancement of natural features, biodiversity and landscapes, and ensure that urban development maintains an appropriate separation and setback from important natural assets. New development should seek to protect and enhance important natural features (habitats and species) within and around the site, should avoid the degradation of ecosystems and include measures to mitigate against any potential negative ecological impacts. (b) Plan for an integrated network of multifunctional and interlinked urban green spaces. This is addressed further in subsection (iii) Public Open Space below. (c) Promote urban greening and Nature-based Solutions (including Sustainable Drainage Systems and slow-the-flow initiatives) for the management of urban surface waters in all new developments and retrofitting in existing areas to ensure that the benefits of ecosystem services are realised. Planning authorities should adopt a nature based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes. (d) The use of Nature-based Solutions at ground level may not be possible on certain brownfield sites due to historic land contamination. In such cases, alternative solutions such as green roofs and walls can be considered.	term SuDS benefits such as attenuating surface water and filtering out pollutants. - 3 No SuDS tree pits are proposed for the development. - Rainwater harvesting tank for irrigation of ground floor landscaping.
Responsive Built Form Built form refers to the layout, position and composition of buildings and to how buildings address streets and open spaces. This is a key element in ensuring the creation of attractive and well-designed settlements. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.5 also refers): (a) New development should support the formation of a legible and coherent urban structure with landmark buildings and features at key nodes and focal points. (b) New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The	Noted. The proposed development, through the use of varied building heights and forms provides clear legibility to the development. The architectural style does not seek to replicate surrounding buildings, due to the varied nature, but has carefully integrated in terms of heights, scale, bulk and materials into the design to compliment the surrounding area. There is an emphasis on creating a fine grain appearance with vertical elevations. This will create a new, attractive urban feature along Blackpitts and Donovan Lane. The building due to its design not only provide a well-defined

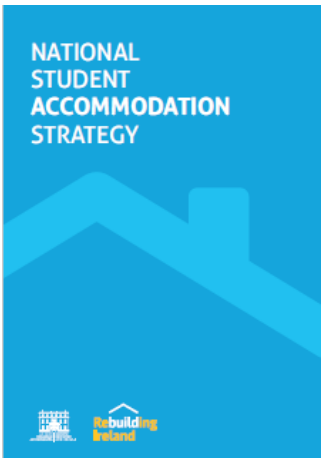
height, scale and massing of development in particular should respond positively to and enhance the established pattern of development (including streets and spaces). (c) The urban structure of new development should strengthen the overall urban structure and create opportunities for new linkages where possible. (d) Buildings should generally present well-defined edges to streets and public spaces to ensure that the public realm is well-overlooked with active frontages. (e) New development should embrace good modern architecture and urban design that is innovative and varied, and respects and enhances local distinctiveness and heritage. (f) Materials and finishes should be of high quality, respond to the local palette of materials and finishes and be highly durable	edge to the new spaces but also ensure that all open spaces are overlooked. This is considered to be an exemplar development showcasing contemporary architecture. A varied, high-quality palette is proposed for the development which creates a distinctive attractive development within the area. Please see the Architecture Design Statement for further information regarding response to build form.

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) in relation to the design of housing. The relevant guidelines to this application area:

SPPR 3 – Car Parking	**EVALUATION OF CONSISTENCY**
It is a specific planning policy requirement of these Guidelines that: (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling. Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–	The proposed student accommodation is a car free development. A single Accessible Parking bay is proposed along with a loading bay. Associated public realm improvement works along Donovan Lane and Blackpitts, including alterations to the existing footpaths/public road, provision of 5no. set-down spaces (including 1no. DAC-compliant space) and 1no. loading bay along Donovan Lane. The set down spaces and loading bay, are provided along Donovan Lane, will provide space for servicing/deliveries/drop-off and pick-up of residents at term times. As set out in the AtkinsRéalis Consulting Engineering Report, this low parking provision is considered acceptable due to nature of student accommodation, the site's inner city, coupled with its proximity to City Centre which has a high level of existing facilities and amenities, a high, and the site's proximity to high frequency public transport. As set out within this Planning Report and the Student Concentration Report, the proposed development is located in close proximity, by foot, cycle or public transport, to 8 No. of the largest universities and private institutions in the Country

street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.	and considered to be highly suitable for student accommodation use. The site is located within a 15-minute cycle of Trinity College Dublin, National College of Art and Design, Royal College of Surgeons, Griffith College, Dublin Business School, University College Dublin, TUD Grangegorman and NCI Ireland which had a total combined enrolment of 82,671 No. third-level students in 2023.
SPPR 4 – Cycle Parking and Storage	**EVALUATION OF CONSISTENCY**
It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended: (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers. (ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.	The proposed development is located in close proximity to 8 No. of the largest universities and private institutions in the Country and considered to be highly suitable for student accommodation use. These are within cycling distance as a result the scheme provides 272 no. of cycle spaces, consisting of; - 160 long-stay stacked spaces in basement - 78 Sheffield stands (including 14 for staff) in basement - 12 cargo/oversized spaces in basement - 22 visitor Sheffield stands at surface level These will be accessed via a Dutch style cycle ramp along the stairs in the courtyard or via 2no. bike lifts, one within the courtyard and the other along the Blackpitts façade. This provision is deemed acceptable due to the site's proximity to 8 universities, and the site's proximity to high frequency public transport.

NATIONAL STUDENT ACCOMMODATION STRATEGY 2017



The Government launched the first National Student Accommodation Strategy (NSAS) in July 2017. The Strategy is designed to ensure that there is an increased level of supply of purpose-built student accommodation to reduce the demand for accommodation in the private rental sector by both domestic and international students attending Higher Education Institutions (HEIs).

The NSAS notes the targets for purpose-built student accommodation bed spaces up to 2019 and 2024 respectively and is ensured to designed there is an increased supply of student accommodation.

The report states that based on the data available, approximately 18% of full-time students in Ireland are accommodated in purpose-built student accommodation. This figure is low by international standards with the equivalent figure for the UK published by Higher Education Statistics Agency being c.27%

When combined with the projects that are currently at Pre-Planning phases in the HEIs, the Department of Education and Skills has identified the potential for at least an additional 21,000 PBSA bed spaces places by 2024 over the baseline figure of 33,441 PBSA bed spaces which are currently available. The impact of an additional 21,000 student accommodation bed spaces, in addition to an additional 1,500 Digs spaces, will free up at least an additional 5,000 rental units for the wider residential rental sector. The report states that *"the most effective way to reduce and stabilise rents in the long-term is to increase supply and accelerate delivery of all types of housing. the aim of this strategy is to support the accelerated availability and delivery of student accommodation including both digs and pbsa, which should in turn lead to a stabilisation of the costs of accommodation."*

The NSAS highlights the growing shortage of student accommodation in Dublin *"in Dublin in particular, all HEIs are reporting that their current provision is heavily oversubscribed and students are finding it difficult to secure accommodation on or near their campuses. the des will continue to work with stakeholders to ensure support for the further development of PBSA both by HEIs and private developers."*

EVALUATION OF CONSISTENCY

The proposed development is located in close proximity to 8 No. of the largest universities and private institutions in the Country and considered to be highly suitable for student accommodation use. The site is located within a 15-minute cycle of Trinity College Dublin, National College of Art and Design, Royal College of Surgeons, Griffith College, Dublin Business School, University College Dublin, TUD Grangegorman and NCI Ireland which had a total combined enrolment of 82,671 No. third-level students in 2023.

The National Student Accommodation Strategy estimates a demand for 42,375 no. bedspaces in Dublin by 2024. The current supply of public and private student bedspaces in Dublin is estimated as 19,004, within 52 No. developments (April 2024). There was a total of 11 No. granted schemes in the planning and development pipelines accounting for an estimated net total of 5,507 No. student bedspaces (April 2024). The majority of these consents are occurring within the existing campus areas of UCD and DCU, or in close proximity to the TU Dublin Grangegorman Campus. The report concludes on this basis that student accommodation will continue to fall short of demand for the foreseeable future.

The accompanying Student Accommodation Concentration Report demonstrates that there is not an overconcentration of student accommodation or student population in the local area, including a map indicating all such facilities within 1km of the development (Figure 6). There is a total of 3,699 No. student accommodation bedspaces currently in operation (April 2024). No further student bedspaces are currently permitted or under construction within the 1 km radius.

The total student population would represent c. 16.5% of the total population when fully occupied (an increase from 12.6% of in 2022). This calculation was derived using the 'PBSA concentration calculation table' (Table 1 above), as informed by international best practice in Edinburgh, ref. Edinburgh City Council (2015) '*Edinburgh Planning Guidance: Student Housing'.* It is submitted in this report that these figures fall well below a threshold of 30% of the total population to describe overconcentration. On this basis, there is unlikely to be any significant relative increase in the number of students living in the area. There is definitely no over concentration of students in this area. .

Development Plan Context 2022-2028

The site is zoned as *'Sustainable Residential Neighbourhoods – Zone Z1'* with the objective *"To protect, provide and improve residential amenities."*

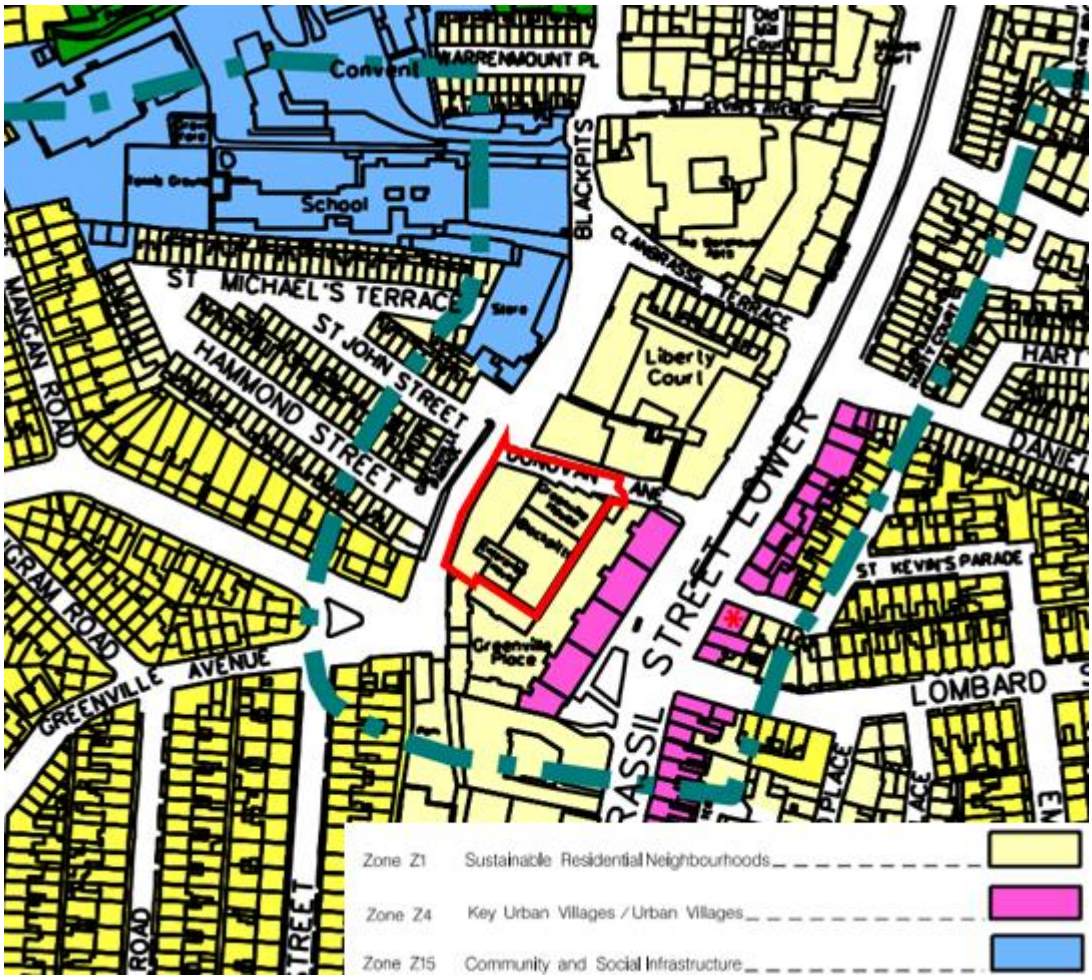


Figure 40: Map E of the Dublin City Council Development Plan 2022-2028

The proposed development is for student accommodation which is 'open for consideration' on this site zoned Z1 under the current development plan.

Z1 – Permissible Uses
Assisted living/retirement home, buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, delicatessen, education, embassy residential, enterprise centre, halting site, home-based economic activity, medical and related consultants, open space, place of public worship, public service installation, residential, shop (local), sports facility and recreational uses, training centre.
Z1 – Open for Consideration Uses
Allotments, beauty/ grooming services, bed and breakfast, betting office, Build to Rent residential, **café/tearoom**, car park, civic and amenity/recycling centre, garden centre/plant nursery, guesthouse, hostel (tourist), hotel, industry (light), laundromat, live/work units, media-associated uses, mobility hub, off-licence, off-licence (part), office, park and ride facility, petrol station, pigeon loft, postal hotel/motel, primary health care centre, public house, residential institution, **restaurant**, **student accommodation**, veterinary surgery.

Chapter 5 *'Quality Housing and Sustainable Neighbourhoods'* of the Development Plan sets out specific policies/objectives in relation to student accommodation. See the following table outlining these policies/objectives and how the proposed development is in line with these policies/objectives.

Policy/Objective	Statement of Consistency
QHSN44 Build to Rent/Student Accommodation/Co-living Development It is the policy of DCC to avoid the proliferation and concentration of clusters of build to rent/student accommodation/co-living development in any area of the city.	As part of this LRD application, McGill Planning have carried Student Accommodation Concentration Report. The purpose of the report is to provide an assessment of concentration of student development in the local surrounding area in the context of the proposed development. The subject site presents an opportunity to contribute to alleviating the prevailing shortage of suitable student accommodation in Dublin on appropriately zoned lands (as recognised within the National Student Accommodation Strategy, and by Dublin City Council within the CDP). This area contains a strong mix of land-uses with a balance of residential, office, and retail buildings, as well as community and amenity areas within a 1km radius of the site. It should be noted that nearly one third (c. 28.0%) of all land area within the 1 km catchment is occupied by low-density single-family dwellings. The proposed development is located close to 8 No. of the largest universities and private institutions in the Country. It is therefore highly suitable for student accommodation use. These universities are within a 15-minute cycle of the site and combined have 82,671 No. third-level students in 2023. In the Student Accommodation Concentration Study submitted with this application it demonstrates that there is not an overconcentration of student accommodation or student population in the local area. There is a total of 3,699 No. student accommodation bedspaces currently in operation (April 2024). No further student bedspaces are currently permitted or under construction within the 1 km radius. The total student population would represent c. 16.5% of the total population when fully occupied (an increase from 12.6% of in 2022). This is below the threshold figure of 30% which

	is identified as appropriate and in line with international best practice as set out in '*Edinburgh Planning Guidance: Student Housing'.* It is submitted that this amount of student accommodation is just over half the acceptable amount before it is considered over concentration. On the basis, that this additional accommodation will only see an increase of c. 4% over the existing student population in the area, and remains below the threshold of 30%, the proposed development will not result in any significant relative increase in the number of students living in the area. It cannot therefore be considered an over concentration of students in this area.
QHSN45 Third-Level Student Accommodation To support the provision of high-quality, professionally managed and purpose built third-level student accommodation in line with the provisions of the National Student Accommodation Strategy (2017), on campuses or in appropriate locations close to the main campus or adjacent to high-quality public transport corridors and cycle routes, in a manner which respects the residential amenity and character of the surrounding area, in order to support the knowledge economy. Proposals for student accommodation shall comply with the 'Guidelines for Student Accommodation' contained in the development standards chapter. There will be a presumption against allowing any student accommodation development to be converted to any other use during term time.	The proposed development is in line with the Guidelines for Student Accommodation. The development is purpose-built student accommodation. The subject site is a well-located and enjoys a high level of access within its locational context to all the sustainable transport modes. For pedestrians, there are footpaths/public lighting on the surrounding street network with signalised pedestrian crossing throughout. The area has extensive designated cycle lanes leading to each of the main academic institutions. The site is within walking distance of both the Red Line Luas (Fatima Station, 20-minute walk) and the Green Line Luas (Harcourt Street Station, 15-minute walk). It is also within walking distance of a variety of bus routes operated by Dublin Bus. Dublin Bus Stop 2388 at St Kevin's Parade located 50 metres from the site provides links from the city centre to the site, and onwards through local suburban neighbourhoods towards Tallaght (No. 49 and 54a). As set out above, in terms of relationship with the surrounding buildings the proposed development is considered to be appropriate and will not impact detrimentally on the surrounding neighbours in terms of overlooking, privacy, or shadowing. It is considered that the

	proposed development will result in improvements to the neighbouring amenity. The development will be retained as student accommodation during term time.

Chapter 15 of the Development Plan 'Development Standards' outlines standards for residential typologies including student accommodation.

Policy	Evaluation of Consistency
15.3 Environmental Assessment - EIA/AA/Ecological Impact Assessment	
15.3.1 Environmental Impact Assessment Environmental Impact Assessments (EIA) consider whether development projects either alone or in combination are likely to have significant effects on the environment.	The proposed development is below the thresholds of Schedule 5 of the Planning and Development Regulations. Please refer to EIA Screening Report for full details.
15.3.2 Appropriate Assessment Appropriate Assessment (AA) under Article 6 of the Habitats Directive considers whether or not a proposed plan or project would adversely affect the integrity of a European Site.	Please refer to AA Screening prepared by Altemar.
15.3.3 Ecological Impact Assessment An Ecological Impact Assessment should be carried out for all developments within or adjacent to any sensitive habitat, ecological corridor, specific landscape character area or which has the potential to contain protected habitats or species.	To accommodate the proposed development, the demolition of the existing building in-situ is required. As such, a bat survey was commissioned and carried out by Altemar Environmental which accompanies this pre-application. The surveys concluded; *"No confirmed bat roosts will be lost. No trees of bat roosting potential are noted on site. The site is brightly lit by street lighting. The proposed development will change the local environment as new structures are to be erected. No bat activity was noted on site. No bat roosts or potential bat roosts will be lost due to this development. The potential for collision risk and impact on flight paths in relation to bats is considered low due to the low level of bat activity on site and the buildings would be deemed to be clearly visible to bats. The proposed development will have a neutral long-term impact on bat populations."*
15.4 Key Design Principles	
15.4.1 Healthy Placemaking All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities, which	The proposed development is fully consistent with and supports the core principles of the 15-minute city concept by providing a mix of uses in an area which in underprovided in

are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city	terms of PBSA as well as a café/restaurant which will improve facilities and amenities to the area. The subject site, as detailed in this report, is strategically positioned in a prime inner-city location, placing it within walking distance of essential services, recreational opportunities, high-quality public transport, and a wide range of local facilities and amenities. The provision of cycle parking within the scheme promotes a modal shift to active travel methods such as walking and cycling.
15.4.2 Architectural Design Quality Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.	The materials used are high quality and will ensure the design of the scheme contributes positively towards the townscape and urban realm. The application is accompanied with a Townscape & Visual Impact Assessment prepared by Modelworks, to identify and determine the likely impacts of the scheme on the receiving environment, in terms of both townscape character and visual amenity. The TVIA should be read in conjunction with the verified photomontages which illustrate how the proposed development would appear from a variety of locations in the surrounding townscape. The report found, the receiving environment has been assessed as having medium townscape sensitivity, meaning it contains some valued elements but generally features a mixed or weak character with potential for change or improvement. The site is an underutilised brownfield plot in the city centre, currently occupied by an unsightly 20th-century warehouse/office building. This building detracts from the character and visual amenity of the surrounding streetscapes and offers no active street frontage, presenting a dead edge to Blackpitts and Donovan Lane. The site is zoned as Z1 'Sustainable Residential Neighbourhoods', which encourages high-

	quality, well-connected housing developments with good access to public transport, open space, and local services. The surrounding townscape is varied in age, use, and scale, featuring both modern, high-density mixed-use developments to the east and older, lower-scale Victorian housing to the west. The contrast in character and building types highlights the opportunity for redevelopment to better integrate the site into its urban context, enhance the public realm, and support sustainable neighbourhood growth. Please refer to the TVIA prepared by Modelworks and Verified views/photomontage prepared by Horan Rainsford for full details.
15.4.3 Sustainability and Climate Action Development proposals will be expected to minimise energy use and emissions that contribute to climate change during the lifecycle of the development with an aspiration towards zero carbon, and ensure the reduction, re-use or recycling of resources and materials, including water, waste and aggregates.	The proposed development will employ the latest technology to provide for sustainable heating and insulation of student bedrooms. The buildings will comply with design regulations that will reduce carbon emissions in line with the Action Plan. This LRD application is accompanied with an Energy Sustainability Statement prepared by Dynamic Design and an Operational Waste Management Plan by Traynor Environmental which setting out the approach to waste management once the site is operational.
15.4.4 Inclusivity and Accessibility Development proposals, including all new large scale developments…… must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.	The proposed development is designed to be accessible to all. Please refer to Accessibility Statement prepared by OHAC.
15.4.5 Safe and Secure Design All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).	The scheme is designed to ensure student residents and visitors are interacting with a safe and secure environment. Communal areas are designed so that active passive surveillance is in operation
15.5.4 Height Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.	Please refer to the height strategy assessment located within Horan Rainsford Architects Design Statement and Architectural Heritage

<table>
<tr><td></td><td>Impact Assessment by ARC. This is also assessed in further detail below.</td></tr>
<tr><td>15.5.5 Density
New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood.</td><td>The proposed development is achieving a density of 285 uph. This density is in line with the site conditions, the need for compact growth and the policies of a 15-minute city. This density makes best use of this scarce resource – land.

Appendix 3 of the CIty Development Plan (Achieving Sustainable Compact Growth for Density and Building Height in the CIty) states a general density range of up to 250 units per hectare within the City Centre & Canal Belt but also allows for higher density up to 300 uph on a case-by-case basis.

Densities above 300 uph will only be considered in “exceptional circumstances where a compelling architectural and urban design rationale has been presented.”

In accordance with Appendix 3 a review of the Performance Criteria (table 3) to justify this development of greater scale and density is outlined further below.</td></tr>
<tr><td>15.5.6 Plot Ratio and Site Coverage
Appendix 3, Table 2 provides indicative plot ratio and site coverage standards.
<table><tr><th>Area</th><th>Indicative Plot Ratio</th><th>Indicative Site Coverage</th></tr><tr><td>Central Area</td><td>2.5-3.0</td><td>60-90%</td></tr><tr><td>Regeneration Area</td><td>1.5-3.0</td><td>50-60%</td></tr><tr><td>Conservation Area</td><td>1.5-2.0</td><td>45-50%</td></tr><tr><td>Outer Employment and Residential Area</td><td>1.0-2.5</td><td>45-60%</td></tr></table></td><td>Plot ratio is 3.95

Site coverage is 59%</td></tr>
<tr><td>15.5.7 Materials and Finishes
All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application.</td><td>The proposed development will provide for a high-quality residential scheme through the design and the materials and finishes proposed. The scheme endeavours to use the best available materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the scheme.</td></tr>
<tr><td>15.5.8 Architectural Design Statements</td><td>Horan Rainsford Architects have prepared an Architectural Design Statement which analyses the context and constraints of the site and includes a detailed design of the development. The Design Statement provides all of this information listed in this section.

The proposed development along Blackpitts has undergone a significant reduction in height</td></tr>
</table>

Table 15-2: Information Requirements for Design Statements **Residential Developments** Site Location and Description Context and Setting Urban Design Rationale Design Evolution / Alternatives Considered Block Layout and Design Site Connectivity and Permeability Height, Scale and Massing Materials and Finishes Open Space (Private, Communal, Public) Public Realm Contribution Compliance with Internal Design Standards Daylight and Sunlight Overlooking, Overbearing, Overshadowing Car and Cycle Parking Management/Lifecycle Report Compliance with DMURS Safety and Security Universal Access	through the complete removal of the sixth floor, directly addressing concerns raised within the LRD opinion. This reduction not only lowers the overall scale of the building but also contributes to a more contextually appropriate relationship with its neighbouring buildings. In addition to the height reduction, the massing along Blackpitts has been reconfigured to include a greater setback, effectively reducing the perceived bulk of the structure from the street level. These changes improve the visual impact of the proposal, ensuring it integrates more sympathetically with the existing townscape and enhances the streetscape character, particularly within this inner city location, between modern developments and the more historic residential areas.
15.5.9 Models and Photomontages	Horan Rainsford Architects have completed the verified views for the site. These provide a realistic view of what the development will look like once it is completed from 17no. of locations. The application is accompanied with a Townscape & Visual Impact Assessment prepared by Modelworks, to identify and determine the likely impacts of the scheme on the receiving environment, in terms of both townscape character and visual amenity.
15.6 Green Infrastructure and Landscaping	
15.6.2 Surface Water Management and SuDs All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council's Surface Water Management Guidance	The surface water strategy within the Civil Engineering Planning Report prepared by JJC Consulting Engineers has been updated to include the provision of green roofs, blue roofs and various other sustainable measures.
15.6.3 Green / Blue Roofs Dublin City Council will require all new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23.	
15.6.5 Urban Greening All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc	Please refer to the landscape architecture pack prepared by JBA Landscape Architects.
15.6.7 Landscape Design Rationale	

The incorporation of landscape features to protect and support biodiversity and to ensure the existing landscaping and environments are protected will be required as part of all applications	JBA Landscape Architects have prepared a Landscape Report as part of this planning application. The report provides details on the following items: landscape proposals, boundary details, planting schedule etc. Please see the Landscape Report for more detailed information.
15.6.8 Landscape Plans and Design Reports Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	
15.6.13 Boundary Treatments Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application.	Horan Rainsford Architects and JBA Landscape Architecture documentation provide detailed design of boundary treatments.
15.7 Climate Action	
15.7.2 District Heating	The buildings will comply with design regulations that will reduce carbon emissions in line with the Action Plan. The Stage 3 LRD application is accompanied with a Climate Action Energy Sustainability Statement prepared by Passive Dynamics.
15.7.3 Climate Action and Energy Statement proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.	
15.8 Residential Development	
15.8.1 Quality/Making Sustainable Neighbourhoods Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including 'Quality Housing for Sustainable Communities: Design Guidelines' (2007), 'Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities' (2009) and accompanying 'Urban Design Manual (2010)', Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads and Streets (2019) and Design Manual for Quality Housing (2022).	The proposed development has had regard to the guidance listed within section 15.8.1. These are discussed in detail above under the National Planning guidance section.
15.8.2 Community and Social Audit All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to	This planning report has a Chapter specifically detailing Community and Social Infrastructure within a 1-2km radius of the subject site. As this is a student accommodation proposal, it will not generate demand for school places. This report demonstrates that there is a

provide additional facilities to cater for the proposed development.	wealth of existing facilities, amenities, restaurants, and retail units within walking distance of the site.
15.8.3 Schools planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand.	
15.15 Built Heritage and Archaeology	
15.15.1.3 Best Practice The development shall be carried out in accordance with the documents listed in this section of the development plan.	The proposed development is in accordance with documents listed.
15.15.1.4 Basements New basement development in the medieval core and known medieval sites shall be avoided. Approved basements may be rescinded where undue damage to in situ archaeological deposits will occur as a result.	Ayesa Engineering have prepared a Basement Impact Assessment which is submitted as part of this LRD Application.
15.18 Environmental Management	
15.18.1 Construction Management All developments comprising 30 or more housing units and commercial developments (as well as institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan. In the event of a grant of permission, and on appointment of a contractor, a final construction management plan will be required to be agreed with the Planning Authority	Noted. JJC Consulting Engineers have prepared an outline Construction Management Plan submitted as part of this pre planning application. This includes advise on Construction Traffic Management and will be finalised following the grant of a permission. The construction management plan includes a Traffic Management Plan which will be finalised as part of the final submission. A phasing plan is not required for this proposed development as it is proposed to complete this development within a single phase.
15.18.1.1 Construction Traffic Management Plan A Construction Traffic Management Plan (CTMP) is a key document that aims to reduce possible impacts which may occur during the construction period of a proposed development. An applicant/developer is responsible for ensuring construction activities are managed in accordance with the CTMP.	
15.18.1.2 Considered Construction Considered Construction seeks to improve the image of the construction industry which requires registered contractors to commit to care about appearance, respect the community, protect the environment, secure everyone's safety and value their workforce.	
15.18.1.3 Phasing Dublin City Council may also require developers to submit a phasing and implementation programme for large developments including commercial development in excess of 5,000 sq. m. and	

residential schemes in excess of 100 units, to ensure a co-ordinated approach to the construction of the development.	
15.18.1.4 Hours of Operation On sites where noise generated by construction would seriously affect residential amenity, the site and building works must be carried out between 0700 and 1800 hours Monday to Friday only, and between 0800 and 1400 hours on Saturdays only. No works shall be carried out on Sundays or bank holidays.	Section 5.7 of the Construction Management Plan states the following: *"Site development and building works will only be carried out between the hours of 8am to 7pm Mondays to Fridays inclusive and between 8am and 2pm hours on Saturdays or working hours stated on the conditions of planning. There will be no construction works carried out on Sundays or public holidays."*
15.18.2 Waste Management All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both and Construction and Operational Waste Management Plan.	Noted. This LRD application is accompanied with a Waste Management Plan prepared by Traynor Environmental.
15.18.4 Basements It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is considered as being an accessible area positioned below the existing street level or ground level and would include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.	Ayesa Engineering have prepared a Basement Impact Assessment for the proposed development.
15.18.9 Noise Dublin City Council will have regard to the Dublin Agglomeration Noise Action Plan 2018– 2023 when assessing planning applications (see also Section 9.5.8: Noise Pollution). Where it is considered that a proposed development is likely to create a disturbance due to noise, a condition may be imposed by the planning authority on any planning permission limiting the hours of operation and level of noise generation.	Please refer to the Construction Management Plan prepared by JJ Cambell & Associates Engineering which contains information regarding Noise mitigation measures.
15.18.10 Air Quality All developments during construction and operational stage shall ensure that the air quality of the surrounding area is not effected (see also Section 9.5.7). Details of the air quality controls in place throughout construction shall be identified in the construction management plan.	Please refer to the Outline Construction Management Plan prepared by J J Cambell & Associates Engineering which contains information regarding Air Quality during construction and Operation stage. Please refer to the EIA Screening Report prepared by MCG Planning.

15.18.11 Ground Investigation Any development containing significant excavation including the construction of a basement or any development on brownfield lands should include a ground investigation report to be submitted with an application.	Noted. Please refer to the Basement Impact Assessment prepared by Ayesa that provides details regarding ground investigation.
15.18.14 Flood Risk Management All applications for developments in flood risk areas shall have regard to the Strategic Flood Risk Assessment of this plan. All applications within flood zones A and B will be required to submit a Site-Specific Flood Risk Assessment to an appropriate level of detail	Please refer to the SSFRA prepared by JBA consulting engineers.
Policy/Objective	**Statement of Consistency**
15.13.1 Student Accommodation Proposals for student accommodation shall be in accordance with Policy QHSN45. Student accommodation should make a positive contribution to the built environment, in terms of design quality, scale, height and the relationship to adjacent buildings. The external layout, including any necessary security arrangements, should be designed to avoid isolating developments from the surrounding community. In assessing proposals, the planning authority will have regard to the pattern and distribution of student accommodation in the locality and will resist the overconcentration of such schemes in any one area, in the interests of achieving a sustainable mix of development, whilst also providing for successful urban regeneration, good public transport/cycling/ walking connectivity, and the protection of residential amenity. All applications for student accommodation must be accompanied by documentation outlining how the scheme will be professionally managed including confirmation that all occupiers will be students registered with a third-level institution. Documentation must also outline how the scheme will support integration with the local community, through its design and layout. Permissions for student housing will be subject to a condition requiring a planning permission for a change of use to other types of residential accommodation. In assessing applications for purpose-built student accommodation, the planning authority will have regard to the following key factors:	The proposed development is of high-quality architecture and respects the surrounding area and adjacent buildings. The architectural style does not seek to replicate surrounding buildings, due to the varied nature, but has carefully integrated in terms of heights, scale, bulk and materials into the design to compliment the surrounding area. There is an emphasis on creating a fine grain appearance with vertical elevations. Please refer to the above section in this planning report which deals with student accommodation justification. This confirms that there is not an over concentration of such schemes in any one area. The application is accompanied by an 'Operational Management Plan' prepared by Global Apartment Advisors. The report provides an overview of the long-term outline management strategy and the operational processes and policies that will be put in place in order to ensure the effective administration and supervision of the proposed student accommodation residence. Please refer to the Student Accommodation Justification Section of this report which confirms that the proposal will not result in an excessive concentration of student accommodation in the locality.

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- The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport.

- The proposal will not result in an excessive concentration of student accommodation (including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality.

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15.13.1.1 Unit Mix
Student accommodation is typically provided on a 'cluster' type model comprising of a group of bedrooms and a shared kitchen / living/ dining space. A minimum of 3 bed spaces with an overall minimum gross floor area of 55 sq. m. up to a maximum of 8 bed spaces and a maximum gross floor area of 160 sq. m. shall be provided in any 'cluster' of student accommodation units.

Consideration will be given to an increase in the number of bedrooms per cluster on campus locations with a maximum of 12 bed spaces per cluster.

Bathrooms must be provided en-suite within each bedrooms unit.

</td><td>The proposed development is in line with these standards. A cluster type model is used within this development.

Please refer to the Housing Quality Assessment prepared by Horan Rainsford Architect's which sets out room sizes and confirms compliance with these requirements.</td></tr>
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Table 15-7 Minimum Bedroom Sizes for Student Accommodation Clusters

Bedroom Type	Bedroom Size	Bedroom Size including en-suite
Single Study	8 sqm	12 sqm
Twin Study	15 sqm	18 sqm
Disabled Study	-	15 sqm

</td><td>This is achieved.

Please refer to Housing Quality Assessment prepared by Horan Rainsford Architect's submitted as part of this application.</td></tr>
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Table 15-8: Communal Requirements for Student Accommodation Clusters

Communal Requirement	Area
Indoor/Outdoor	5-7 sqm per bedspace
Kitchen/Living/Dining	4 sqm per bedspace
Total	9-13 sqm per bedspace

</td><td>This is achieved.

With regards to internal communal amenity facilities, at ground level the scheme provides a reception/lobby area and café/restaurant, at lower ground level (basement).

Further communal amenity facilities are provided at the basement which will be accessed via an external stair or by each internal core. These include a gym with</td></tr>
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	changing facilities, a multi-functional space and cinema in addition to the library, cafe-restaurant and multi-use space at ground floor level. The basement level while providing high-quality communal facilities will also house the plant space required for the development, a kitchen for the cafe-restaurant, a laundry, a bin store and bike storage for 272no. bikes. 2no. service lifts and a Dutch style bike ramp along the edge of the external stairs will facilitate access for bicycle users. The proposed external communal open space provides c.673sqm predominantly at ground floor level within a central courtyard. This is landscaped to provide attractive spaces to relax, this space also provides a basketball practice hoop and seating areas. The scheme also provides a communal roof terrace for the enjoyment of the building's students. The overall quantum communal amenity space provided is 1194 sqm exceeding the 1065 sqm required.
15.13.1.4 Car Parking / Bicycle Parking Designated car parking will not be supported in student accommodation schemes in the city. However, car parking for persons with disabilities should be provided. See Appendix 5 for further details. Provision can be made to provide for a car sharing service for the use of residents. All student accommodation developments should, however, be accompanied by a mobility management plan – refer to transport appendix 5. A minimum of one cycle parking space per resident should be provided within the development as well as additional visitor parking at surface level at a rate of 1 per 10 no. residents – refer to Appendix 5 for further details.	As per the Dublin City Development Plan 2022-2028, it is outlined that 1 bicycle space per bedroom is required along with 1 visitor space per every 5 bedrooms (as set in appendix 5). As such, 267no. bike spaces are required. As per the NTA Cycle Design Manual (2023), Section 6.3, 272 no. cycle parking spaces comprising: - 160 long-stay stacked spaces in basement - 78 Sheffield stands (including 14 for staff) in basement - 12 cargo/oversized spaces in basement - 22 visitor Sheffield stands at surface level * Of which 5% is non-standard bike parking equivalent to 12 parking spaces These will be accessed via a Dutch style cycle ramp along the stairs in the courtyard or via 2no. bike lifts, one within the courtyard and the other along the Blackpitts façade.

	Please refer to documentation prepared by AtkinsRéalis Consulting Engineers for full details regarding parking strategy.

Appendix 3 Table 3: Performance Criteria in Assessing Proposal for Enhanced Height, Density and Scale	
Objective 1: To promote development with a sense of place and character Enhanced density and scale should: • respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints, • have a positive impact on the local community and environment and contribute to 'healthy placemaking', • create a distinctive design and add to and enhance the quality design of the area, • be appropriately located in highly accessible places of greater activity and land use intensity, • have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, • not be monolithic and should have a well considered design response that avoids long slab blocks, • ensure that set back floors are appropriately scaled and designed.	The text, diagrams and illustrations in Architects Design Statement and also in the supporting information submitted aim to demonstrate compliance with this objective. The block has been carefully designed and located to minimise any negative impact on the adjacent residential properties. The block has been stepped back to minimise overlooking and the impact on daylight and sunlight. The development will result in a more positive streetscape along this part of Blackpitts bringing a new urban frontage and active use and footfall to the area.
Objective 2: To provide appropriate legibility Enhanced density and scale should: • make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability.	The proposed development will provide a strong frontage to Blackpitts which will help create a sense of enclosure and place for pedestrians walking along this street.
Objective 3: To provide appropriate continuity and enclosure of streets and spaces Enhanced density and scale should: • enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,	The proposed development will provide a strong frontage Blackpitts which will provide a greater sense of enclosure and urban legibility. The communal space within the development will be overlooked by the proposed student accommodation. This will ensure adequate passive surveillance is provided to the public realm.

• provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.	The heights and streets provide an appropriate street width to building height ratio at a human scale.
Objective 4: To provide well connected, high quality and active public and communal spaces Enhanced density and scale should: • integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, • be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards, • ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16, • ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development, • ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated, • provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.	The proposed development will provide a high-quality design that will integrate into and enhance the site. The design prioritises pedestrians, cyclists and public transport within this car free development. The block has been carefully located to ensure appropriate distance is provided between the proposal and the existing adjacent properties. The daylight sunlight assessment demonstrates that the proposed accommodation and open spaces all achieve appropriate levels of daylight. The spaces and streets have all been designed to be people friendly and accessible.
Objective 5: To provide high quality, attractive and useable private spaces Enhanced density and scale should: • not compromise the provision of high quality private outdoor space, • ensure that private space is usable, safe, accessible and inviting, • ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16, • assess the microclimatic effects to mitigate and avoid negative impacts, • retain reasonable levels of overlooking and privacy in residential and mixed-use development.	There is a high quality of communal and private open spaces provided. All of these spaces are safe, accessible, and inviting. The daylight sunlight assessment demonstrates that the proposed accommodation and open spaces all achieve appropriate levels of daylight. The proposal has been designed to ensure passive surveillance is provided to the communal spaces while also ensuring a high level of privacy is maintained for the bedspaces.
Objective 6: To promote mix of use and diversity of activities Enhanced density and scale should: • promote the delivery of mixed-use development including housing, commercial and employment	The subject site is located within a short walking distance of a range of amenities such as retail, restaurants, public houses and employment hubs. Therefore, it was not considered appropriate to provide mixed uses on the subject site.

development as well as social and community infrastructure, • contribute positively to the formation of a 'sustainable urban neighbourhood', • include a mix of building and dwelling typologies in the neighbourhood, • provide for residential development, with a range of housing typologies suited to different stages of the life cycle.	The proposed development will provide student accommodation in this inner-city location which will support the range of facilities and amenities in the area and provide housing for people to live. The proposed PBSA will improve the residential supply quality in the area and will address the critical student accommodation shortage in the city.
Objective 7: To ensure high quality and environmentally sustainable buildings Enhanced density and scale should: • be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16, • not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain, • ensure a degree of physical building adaptability as well as internal flexibility in design and layout, • ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive, • maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage, • be constructed of the highest quality materials and robust construction methodologies, • incorporate appropriate sustainable technologies, be energy efficient and climate resilient, • apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16), • incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based S UDS solutions are in place – see Appendix 13, • include a flood risk assessment - see SFRA Volume 7.	The Architectural drawings and schedules, the Architectural Design Statement and the reports provided by other Design Team consultants cover aspects of the design such as sunlight and daylight, overshadowing, building materials, energy efficiency, use of sustainable technologies, surface water management, flood risk and assessment of embodied energy impacts.

• include an assessment of embodied energy impacts – see Section 15.7.1	
Objective 8: To secure sustainable density, intensity at locations of high accessibility Enhanced density and scale should: • be at locations of higher accessibility well served by public transport with high-capacity frequent service with good links to other modes of public transport, • look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.	The subject site is well connected to the wider area and the city centre with high quality, high frequency bus routes. The layout has been designed to provide the optimum layout for access while providing a high-quality scheme that prioritises pedestrians and creates a human scaled place.
Objective 9: To protect historic environments from insensitive development Enhanced density and scale should: • not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below. • be accompanied by a detailed assessment to establish the sensitives of the existing environment and its capacity to absorb the extent of development proposed, • assess potential impacts on keys views and vistas related to the historic environment.	The site is not located within an Architectural Conservation Area and does not contain any Protected Structure or National Monument. As shown in the Architects Design Statement and the photomontages, the site and its surrounding environment has the capacity to absorb the proposed development within this inner-city context.
Objective 10: To ensure appropriate management and maintenance Enhanced density and scale should • Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc	The application is accompanied by an 'Operational Management Plan' prepared by Global Apartment Advisors. The report provides an overview of the long-term outline management strategy and the operational processes and policies that will be put in place in order to ensure the effective administration and supervision of the proposed student accommodation residence.

Conclusion

The proposed development is located in close proximity to 8 No. of the largest universities and private institutions in the Country and considered to be highly suitable for student accommodation use. The site is located within a 15-minute cycle of Trinity College Dublin, National College of Art and Design, Royal College of Surgeons, Griffith College, Dublin Business School, University College Dublin, TUD Grangegorman and NCI Ireland which had a total combined enrolment of 82,671 No. third-level students in 2023.

Accordingly, this site presents a prime opportunity to provide essential student accommodation in a highly desirable location which is serviced by excellent public transport, services and social infrastructure and close to educational facilities. Having regard to the zoning of the site the proposed development is open for consideration under the City Development Plan 2022-2028.

The subject site is a highly accessible location which benefits from high frequency public transport services. The site is also within short walking distance of the city centre core. It is a location where increased heights and densities of development are to be supported having regard to ministerial guidelines, as well as national, regional and local policy objectives, and have been as evidenced by a number of significant redevelopments that have occurred in the vicinity.

The proposed design has been well considered within the principles of significant brownfield regeneration. The proposal achieves a very high-quality architectural design with long lasting, durable material proposed. The layout, form and scale (including setting back of the top floor and other amendments) seeks to physically and visually integrate into the immediate urban setting whilst achieving a sustainable compact urban form that aligns with national and city planning policy for a brownfield city site.

The proposed development is in line with the currently adopted National Guidance, in the form of the NPF, along with National Guidance (Urban Development and Building Heights) which require Local Authorities and developers to maximise the use of development sites within cities in order to achieve the goal of a more compact city.

As a result, high densities, along with higher buildings, can be acceptable if it is designed to a high-quality standard. National guidance advises against the use of quantitative standards as a catch-all for development and advises the use of qualitative standards when assessing new applications.

In summary, the proposed student accommodation development makes use of a well-located brownfield site within an area of ongoing regeneration. It is in line with relevant planning policy at national and local levels, supports sustainable urban development, and provides accommodation in close proximity to a significant concentration of higher education institutions. The design approach reflects its context and aims to contribute to the wider transformation of the area in a considered and balanced manner.

The proposed development is located close to 8 No. of the largest universities and private institutions in the Country. It is therefore highly suitable for student accommodation use. These universities are within a 15-minute cycle of the site and combined have 82,671 No. third-level students in 2023.

In the Student Accommodation Concentration Study submitted with this application it demonstrates that there is not an overconcentration of student accommodation or student population in the local area. There is a total of 3,699 No. student accommodation bedspaces currently in operation (April

2024). No further student bedspaces are currently permitted or under construction within the 1 km radius.

The total student population would represent c. 16.5% of the total population when fully occupied (an increase from 12.6% of in 2022). This is below the threshold figure of 30% which is identified as appropriate and in line with international best practice as set out in '*Edinburgh Planning Guidance: Student Housing'.*

It is submitted that this amount of student accommodation is just over half the acceptable amount before it is considered over concentration. On the basis, that this additional accommodation will only see an increase of c. 4% over the existing student population in the area, and remains significantly below the threshold of 30%, the proposed development will not result in any significant relative increase in the number of students living in the area. It cannot therefore be considered an over concentration of students in this area.

We trust that the submission is satisfactory, and we look forward to hearing from you in due course with a positive decision.

Yours faithfully,

Sean Maguire
Senior Planner