

STATEMENT OF CONSISTENCY

In respect of

**PROPOSED MIXED USE DEVELOPMENT (STUDENT
ACCOMMODATION AND CAFÉ) LOCATED AT THE FORMER RIALTO
CINEMA, 355 SOUTH CIRCULAR ROAD, DUBLIN 8, D08 TX20**

Prepared on behalf of

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1.0 EXECUTIVE SUMMARY

This Statement of Consistency demonstrates that the proposed student accommodation development on lands at No. 355 South Circular Road, Dublin 8, D08 TX20 is consistent with the relevant policies pertaining to the site at local, county and national levels.

The proposed development may be summarised as follows:

- A total of 317 No. student beds broken down into:
 - 276 No. 1-bed bedrooms;
 - 33 No. studio units; and
 - 4 No. 2-bed bedrooms.

Dublin City Development Plan 2016-2022

The subject proposal is fully consistent with the provisions of this *Development Plan* for the following reasons:

CONSISTENCY WITH DUBLIN CITY DEVELOPMENT PLAN 2016-2022
Will revitalise an under-utilised site within Dublin’s Inner City, adjoining a Strategic Development and Regeneration Area.
The proposal comprises the redevelopment of a derelict site.
Through the redevelopment of a brownfield site, the scheme contributes to the Compact City Vision.
The proposal contributes to the intensification and consolidation of Dublin City as per the <i>Development Plan’s Core Strategy</i> .

The following characteristics of the subject proposal are fully consistent with the relevant policies and objectives of the *Development Plan*.

Core Strategy
<ul style="list-style-type: none"> ▪ The provision of 313 No. bedrooms for third-level students on a c. 0.30 ha site contributes to the consolidation and enhancement of the Inner City, which is also in line with Policy SC1, which states: <p style="text-align: center;"><i>“To consolidate and enhance the inner city by linking the critical mass of existing and emerging clusters and communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Digital Hub, Newmarket, Parnell Square, the Ship Street Area and Smithfield, with each other, and to regeneration areas.”</i></p>



Settlement and Housing Policy

- The proposal comprises a high-quality residential development in the Inner City, which is a prioritised area according to the Settlement Strategy
- Proposal adjoins a Strategic Development and Regeneration Area (SDRA 13) and will support the social, economic, physical development and rejuvenation of the area.
- The scheme responds sensitively to the existing environment through the retention of the former cinema's "front building" (NIAH listed), successfully incorporating it to the proposal. Thus revitalising the area while adequately preserving its character.
- Proposal will provide 317 No. bed spaces in the Inner City, which has an estimated capacity of 8,900 residential units, according to the Settlement Strategy.

Local Economic and Community Plan

- The proposed development will bolster the delivery of a number of high-level goals of the LECP, including:
 - High level Goal 3: the provision of student accommodation supports the adequate provision of a range of mixed tenure, affordable, adaptable housing and work spaces that are fit for purpose in economically, socially and culturally mixed and sustainable neighbourhoods.
 - High level Goal 4: the proposed student accommodation scheme contributes to put in place the infrastructure that positions Dublin as a safe, environmentally sustainable, vibrant, diverse and attractive place to live, work, visit and invest in by planning and providing for balanced and sustainable social and economic development, catering for a growing population.
 - High level Goal 7: the proposed student accommodation scheme assists in supporting the education sector, which can be instrumental in creating, sustaining and growing quality employment and self-employment opportunities for all.

Movement and Transport

- The subject site benefits from its location within walking and cycling distance to the City Centre. The site is also in close proximity to a number of Dublin Bus stops. The site's location within the Inner City enables the proposal of a car-free development, which aligns the proposal with the Core Strategy's goal to reduce car congestion and half the number of car trips to Dublin by 2030.
- The proposal is fully aligned with Policy MT2 that seeks to promote modal shift from private car use towards more sustainable forms of transport.



Water, Drainage and Environment Services
<ul style="list-style-type: none">▪ Consultation with Irish Water has been carried out, and the latter have confirmed that there is adequate capacity to cater for the subject proposal (see separate pre-connection enquiry documentation) and that IW has no objection to the Design proposal submitted (see later dated 20th May 2019 by Irish Water) and Murphy Matson O’Sullivan’s <i>Engineering Services Report Rev. 6</i> dated 4th July 2019 submitted with this application).▪ The proposal incorporates SUDs principles and will achieve greenfield run-off rates of less than 2.l/sec/ha. The proposal also separates foul and surface water drainage.
Energy and Communications
<ul style="list-style-type: none">▪ The proposed development will maximise energy efficiency through layout, siting and maximising solar gain. The Project has been designed to be Near Zero Energy Building Compliant (NZEB).
Student Accommodation
<ul style="list-style-type: none">▪ The proposed scheme is fully compliant with the requirements and standards of the <i>Guidelines for Student Accommodation</i> included in the <i>Development Plan</i>.

Subject Proposal is Fully Consistent with 2040 National Planning Framework:

- The proposal comprises a purpose-built student accommodation facility located in Dublin’s Inner City and well connected through sustainable means of transport to a range of Third Level Education Institutions.

Subject Proposal is Fully Consistent with Eastern and Midlands Regional Spatial Economic Strategy 2019:

- The proposal promotes the regeneration of the city and will support compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs.

Subject Proposal is Fully Consistent with Rebuilding Ireland: Action Plan for Housing and Homelessness, 2016:

- The provision of well-designed and located student accommodation is identified as being key to relieving pressure on the private rental sector. Under the Action Plan, it is a ‘Key Action’ to “*support greater provision of student accommodation*”.

Subject Proposal is Fully Consistent with Greater Dublin Area Transport Strategy, 2016 - 2035:

- The non-provision of parking spaces on lands proximate to public transport infrastructure connecting with Dublin City Centre is compatible with the ethos of the *Transport Strategy*.



Subject Proposal is Fully Consistent with the Provisions of the Planning System and Flood Risk Management Guidelines, 2009

- A site-specific *Flood Risk Assessment Rev H* dated 4th July 2019 prepared by Murphy Matson O’Sullivan has been carried out for the proposed development. The assessment has demonstrated that the proposal is fully in compliance with the core objectives of the *Planning System and Flood Risk Management Guidelines, 2009*.

Subject Proposal is Fully Consistent with the Provisions of the Sustainable Residential Development in Urban Areas Guidelines, 2009

- The proposed development comprises the redevelopment of a brownfield site in the inner city. The proposal fully meets the requirements contained within these *Guidelines* in relation to density and the efficient use of resources. The proposal also promotes, as reflected in the Mobility Management Plan submitted, sustainable travel patterns. In addition, the proposed development has been designed to comply with NZEB standard, thus demonstrating an efficient use of energy.

Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’

The proposal is fully compliant with the objectives of the *Guidelines* as it provides purpose-built accommodation for third level students, contributing to alleviate the pressure on the housing market.



2.0 INTRODUCTION

2.1 Legislative Context

In accordance with Section 4(1) of the *Planning and Development (Housing) and Residential Tenancies Act, 2016*, Molaga Capital Limited¹ is applying for permission for development in respect of a proposed Strategic Housing Development (SHD) at 355 South Circular Road, Dublin 8, D08 TX20. The subject report constitutes the “Statement of Consistency” required to support the Application.

2.2 Outline of This Report

This Statement of Consistency provides a description of the proposed site location and proposed development followed by a list of the various statutory and strategic policy documents considered. The Statement continues to demonstrate full consistency with the *National Planning Framework*, the pertinent *Development Plan* and the relevant Section 28 (of the *Planning and Development Acts, 2000 (as amended)*) *Guidelines*.

3.0 DESCRIPTION OF PROPOSAL

3.1 Site Location

The subject site is located on South Circular Road, Dublin 8, D08 TX20 and measures some 0.3 ha. Sitting within the site is the vacant former Rialto Cinema designed by architect Frederick J. Macaulay.

The Cinema opened in 1936 and had the capacity for c. 1,500 individuals. The front building has an imposing presence on South Circular Road, signifying the social importance cinemas once had in suburban areas.

The Cinema was later closed in August 1970 and was converted into a car showroom in 1971.² The site measures some 0.3 ha³ and comprises a detected three-bay, three-storey former cinema. The building is an existing three-storey structure, the building has an internal floorspace area of approximately 3,089 sq m.

The subject site is bounded: to the north by South Circular Road; to the east by a terrace of 2-storey houses (Nos. 333 to 353 South Circular Road) and what appears to be an industrial building; and to the south and west by the Dolphin House estate.

The site is located in Dublin’s Inner City and forms part of Dolphin’s Barn. The surrounding context is distinguished by a mixture of decaying social housing buildings in the process of regeneration (with Phase 1 works ongoing and Phase 2 at design stage); established low-rise residential dwellings; modern mid-rise residential developments and commercial buildings.

The former cinema is categorised as ‘Architectural Historical’ within the National inventory of Architectural Heritage (Reg. No. 50080224) and of ‘Regional’ importance. It is not a Protected Structure.

¹ Amberley Lawn, Grange, Douglas, Cork, T12 X2AX.

² <http://cinematreasures.org/theaters/24495>.

³ ShipseyBarry Architects.



This proposal represents an exemplary reinvigoration of an underutilised site for the provision of a student accommodation scheme that can take advantage of sustainable transport options and is within easy access to a number of Third Level institutions.

3.2 Proposed Development

The proposed design strategy responds to the opportunities and constraints of the location and site characteristics.

The intention is to preserve the character of the site, retaining the front art deco element of the former cinema and delivering a purpose-built student accommodation facility to cater for the increasingly growing student population in the city.

The retained and restored Cinema head building serves as the main 'set up' for the layout of the building. The principal entry point for residents to the scheme is through the former cinema entrance portico.

The development will consist of: the demolition of all buildings and structures (c.2,575 sq m) on site with the exception of the front Art Deco section of the building, which will be retained, restored to its original form, and incorporated into the proposed development (existing window opes on the eastern and western façade of the retained section of the building will be infilled with matching brickwork); the eastern boundary wall will be retained and restored.

The development will also consist of the construction of a mixed-use building (with a total area of c. 11,266 sq m) ranging in height from three to seven storeys over basement comprising a student accommodation scheme of 317 No. student beds arranged in 313 No. bedrooms (276 No. 1-bed bedrooms, 4 No. 2-bed bedrooms and 33 No. studios); and ancillary café with an outdoor garden area.

The development includes: 4 No. open courtyards (3 No. at Ground Floor Level and 1 No. at First Floor Level); TV lounge; gym; cinema; communal areas; circulation areas; reception; library; and a meeting/event room.

The development will also consist of: parking for 160 No. bicycles accessed directly from South Circular Road; 7 No. visitor bicycle parking spaces located to the front of the building off South Circular Road; a set down area off South Circular Road; attenuation chamber; tank, plant and pump room; water storage and pump room; boiler, buffer and calorifier room; sprinkler, storage and pump room; laundry; toilets; bins area; substation; switch/meter room; green roofs; PV solar panels; and all hard and soft landscaping; and all other associated site excavation, infrastructural and site development works above and below ground including changes in level, boundary treatments and associated site servicing (foul and surface water drainage and water supply).

The proposal includes for internal and external communal spaces in compliance with the *Development Plan* requirements.

3.2.2 Parking – Bicycle storage for 160 No. bikes and No Car Parking Provided



No car parking is proposed for the proposed development. The site's location within the inner city, within walking and cycling distance to the city centre and in an area well served by public transport (Dublin Bus and the LUAS Red Line).

Some 160 No. bicycle parking spaces are required for 317 No. students, which is in compliance with the *Dublin City Development Plan* standard (as set in Table 16.2) of 1 space per 2 students.



4.0 POLICY DOCUMENTS CONSIDERED

The following policy documents have informed this Statement of Consistency:

4.1 Statutory Policy Documents

1. *Dublin City Development Plan 2016-2022.*

4.2 Strategic Policy Documents

1. *Project Ireland 2040 - National Planning Framework, 2018.*
2. *Eastern and Midlands Regional Spatial Economic Strategy 2019*
3. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016).*
4. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, May 2009.*
5. *Greater Dublin Area Transport Strategy 2016-2035.*
6. *Design Manual for Urban Roads and Streets (DMURS) (2013).*
7. *National Student Accommodation Strategy, 2017.*
8. *The Planning System and Floor Risk Management (2009).*
9. *Urban Design Manual - A Best Practice Guide (2009).*
10. *Urban Development and Building Heights (2018).*



5.0 STATUTORY POLICY

5.1 *Dublin City Development Plan 2016-2022*

The Vision for the City is outlined in the Development Plan:

“Within the next 25 to 30 years, Dublin will have an established international reputation as one of Europe’s most sustainable, dynamic and resourceful city regions. Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, a vibrant culture and a diverse, smart, green, innovation-based economy. It will be a socially inclusive city of urban neighbourhoods, all connected by an exemplary public transport, cycling and walking system and interwoven with a quality bio-diverse green space network. In short, the vision is for a capital city where people will seek to live, work, experience, invest and socialise, as a matter of choice.”

5.1.1 Student Accommodation Policies

The *Development Plan* acknowledges the current need for third-level student accommodation within the City and the growth of Dublin as an international education sector. The need for appropriately-located high-quality, purpose-built and professionally-managed student accommodation is consistently growing as Dublin’s educational institutions become more attractive to international students.

Section 5.5.12 of the *Development Plan* outlines the following policy:

QH31: *“To support the provision of high-quality, professionally managed and purpose-built third-level student accommodation on campuses or in appropriate locations close to the main campus, in the inner city 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.”*

[Our emphasis.]

Additionally, the *Development Plan* further outlines additional supportive policies:

CEE12 (ii): *“To promote and enhance Dublin as a world class tourist destination for leisure, culture, business and student visitors.”*

CEE19 (i): *“To promote Dublin as an international education centre/student city, as set out in national policy, and to support and encourage provision of necessary infrastructure such as colleges (including English language colleges) and high-quality, custom-built and professionally-managed student housing.”*

CEE19(ii): “To recognise that there is a need for **significant extra high-quality, professionally-managed student accommodation developments in the city;** and to facilitate the high-quality provision of such facilities.”

We submit that the proposed development is fully aligned with the above listed policies.

5.1.2 Development Management Guidelines and Standards

As illustrated by Figure 5.1, the subject site is located in zone Z4 *District Centres (incorporating Key District Centres)* with the objective:

“To provide for and improve mixed-services frailties.”

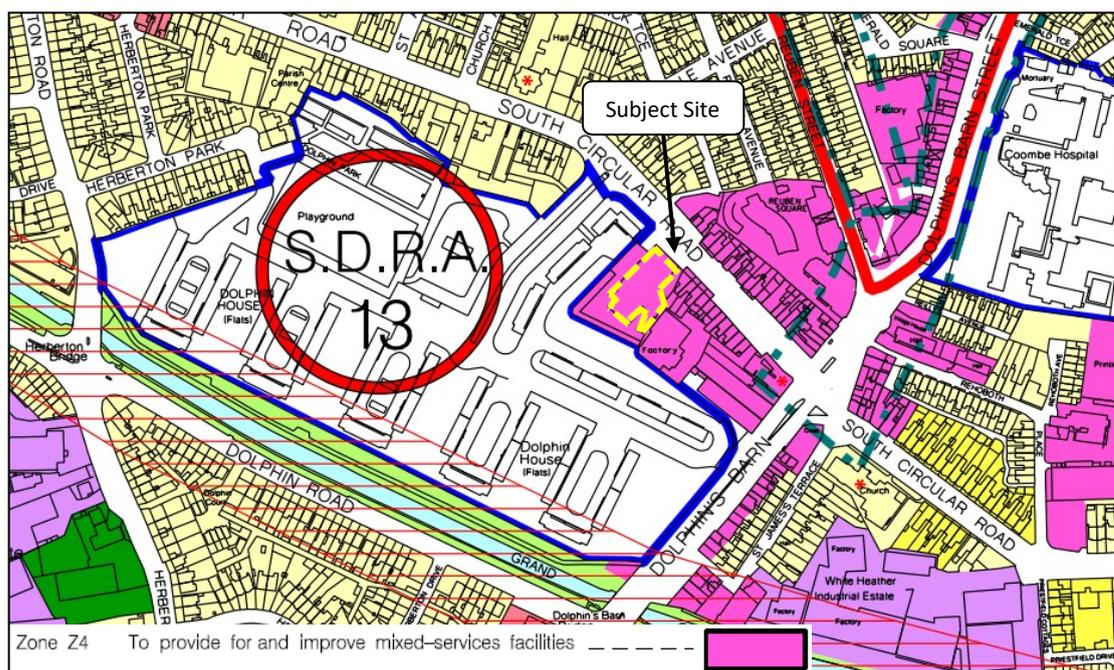


Figure 5.1 Extract of Map E of the *Development Plan*, subject site outlined in yellow dashes. (Source: *Dublin City Development Plan 2016-2022* Map E, annotated by TPA, 2018.)

Residential and restaurant uses are “permitted in principle” under the zoning objective Z4.

The ‘Residential’ definition found in Appendix 21 of the *Dublin City Development Plan 2016-2022* outlines that Student Accommodation is considered a ‘Residential’ land use, as compared to the previous *Development Plan (2011-2017)*, which included Student Accommodation as a Commercial use.

The following outlines the definition of Residential:

“The use for human habitation of a building, or part thereof, including houses, flats, bed-sitting rooms and residential mews buildings. The definition of house and habitable house in Section 2 of the Planning and Development Act 2000 (as amended) shall apply. Residential also includes student accommodation and build-to-let schemes.” (Appendix 21 of the *Dublin City Development Plan 2016-2022*.)

[Our emphasis.]



Building Height – As identified within Map K of the *Development Plan*, the subject site is considered to be ‘inner city’. A maximum height of 24m is available for residential developments within the ‘inner city’ zone.

As such, we propose a building of c.20m high that respects the building form of its environs. Having reviewed the Scheme, we submit that it accords with the height limits of the *DCDP 2016-2022*.

Site Coverage – The Indicative Site Coverage standards, according to the *Development Plan*, for zone Z4 is 80%.

The proposed development intends to provide a site coverage of 59.9%, which is compliant with the *Development Plan* standards.

Plot Ratio – The Indicative Plot Ratio standards, according to the *Development Plan*, for zone Z4 is 2.0:1. We note that the Plot Ratio standard is indicative only. Furthermore, the *Development Plan* lists certain circumstances where a higher plot ratio may be permitted:

- *“Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed.*
- ***To facilitate comprehensive redevelopment in areas in need of urban renewal.***
- *To maintain existing streetscape profiles*
- *Where a site already has the benefit of a higher plot ratio*
- ***To facilitate the strategic role of institutions such as hospitals”***

[Our emphasis.]

In our opinion the proposed development will contribute to the renewal of the area, which is already underway with the construction of Phase 1 of the Dolphin House regeneration.

We understand that the proposal for Phase 2 will be lodged by DCC soon and the Design Team has worked closely with DCC to ensure that the proposed development and the Phase 2 re-development provide a coherent and harmonic streetscape, which would greatly enhance an underperforming part of the city.

Furthermore, in our opinion, the proposal will bolster the strategic role in the city’s Third Level Education Institutions.

The proposed development intends to provide a Plot Ratio of 3.76:1, which in our opinion, is in line with the *Development Plan* policies and objectives since it facilitates and contributes the redevelopment of the Dolphin’s Barn area and facilitates the strategic role of Third Level education institutions.



Car Parking – No car parking is proposed as part of the proposal. The *Mobility Management Plan* prepared by Murphy Matson O’Sullivan dated 14th February 2019 demonstrates that the development will promote and be fully reliant upon sustainable means of transport, in line with National and Dublin City Council policy.

Cycle Parking – Section 11.9.2 of the *Development Plan* requires that secure cycle facilities be provided within student accommodation. It is stated that 1 No. bicycle space shall be provided for every 2 No. pupils. Accordingly, 160 No. spaces are provided for 317 No. students. A large gated double rack bike parking facility is located off South Circular Road to the north west corner with direct access to the lobby. (See Drawing No. SB-2017-015-202 prepared by ShipseyBarry.)

Guidelines for Student Accommodation – As outlined within the *Development Plan*, the following guidelines for student accommodation are relevant:

1. *“The City Council supports the provision of **high-quality, professionally managed, purpose-built third-level student accommodation**, either on campus or in **accessible locations** adjacent to quality public transport corridors and cycle routes, in a manner which **respects the residential amenities of the locality**.”*
2. *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.*
3. *The student accommodation should be designed to give **optimum orientation in terms of daylight to habitable rooms**. Given the nature of student occupancy, the residential standards in relation to dual aspect may be relaxed. Proposed developments shall be guided by the principles of *Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice* (Building Research Establishment Report, 2011).*
4. *Adequate **open space of suitable orientation** should be provided within developments for the amenity of students, which can include terraces, courtyards and roof gardens, where appropriate. All proposals must provide appropriate **indoor and outdoor communal and recreational facilities for students at a combined level of at least 5-7 sq.m per bedspace**. The provision of indoor communal space is particularly important for schemes with a high proportion of studio units, to allow students to interact outside the studio room (in study rooms, tv rooms etc). Where accommodation is provided on-campus, communal facilities will be assessed on a case-by-case basis having regard to the level of and access to on-campus amenity. Details are to be provided as part of the application.*
5. *In assessing proposals, the planning authority will have regard to the **pattern and distribution of student accommodation in the locality**, and will resist the over-concentration 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.*



6. *The applicant will be requested to submit **evidence to demonstrate that there is not an over-concentration of student accommodation within an area**, including a map showing all such facilities within 0.25 km of a proposal. (TPA note: Variation No. 3 to the *Development Plan* increased the radius of the area where over-concentration should be avoided to 1km.)*
7. *The provisions of Part V (Social and Affordable Housing) of the Planning Acts do not apply to student accommodation in the City Council area.*

Indoor and Outdoor communal and recreational facilities – Section 16.10.7 of the *Development Plan* sets out the communal space requirements for apartments. These standards specify that at least between 5 and 7 sq m of communal space per bed space must be provided. It is confirmed that the communal space ratio provided is 7 sq m per bed (2,230 sq m of internal and external communal areas combined for 317 No. beds), which complies with the *Development Plan* requirement.

Internal Design Standards – The *Guidelines for Student Accommodation* of the *Development Plan* set out the internal standards to be complied with. We refer to the *Room Data* sheet prepared by Shipsey Barry Architects included in their *Architectural Report* dated July 2019, which demonstrates how all the internal standards are met and even exceeded.

Student Accommodation Concentration Report – Section 16.10.7 of the *Development Plan* seeks to prevent the over-concentration of Student Accommodation development within a given area. Therefore, the Council requires the Applicant to provide evidence demonstrating that there is not an over-concentration of student Accommodation within a 0.25 km (250 m) radius.

On 19th September 2017, the Council approved Variation No. 3 of the *Dublin City Development Plan 2016-2022*, which extended the 0.25 km (250 m) radius to a 1 km (1000m) radius.

The *Development Plan* does not specify any method(s) that would determine what is considered ‘overconcentration’ of Student Accommodation in a given area.

The assessment of intensification of student accommodation is an approach that has been applied in the UK for the last few years. In that regard Nathaniel Lichfield & Partners, a UK leading planning consultancy, coined the term “studentification” and developed the tool ‘BeDSPACE’ that is being widely use to: “assist developers, operators, universities, colleges and local planning authorities in identifying opportunities for PBSA across the UK and in demonstrating the need and capacity for new PBSA within a local area.”⁴

The methodology proposed in BeDSPACE consists on a determination of the existing and proposed supply and the unmet demand within the catchment area in order to determine the potential capacity for new student accommodation.

Therefore, TPA has identified the surrounding Student Accommodation (Applications that have been granted permission or is currently under construction or in use), within a 1 km radius of the subject site. (See Figure 5.2.)

⁴ Source ‘BeDSPACE’ brochure available at: <https://lichfields.uk/media/1771/bedspace.pdf>.



Additionally, we have provided the Student Concentration Map, which outlines the subject site in relation to local shops, public transport services and existing and approved student accommodation. (See Figure 5.3).



Figure 5.1: Map outlining the 1 km radius of student accommodation from subject site.

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 PLANNING FOR THE FUTURE

1 km Radius 

Approved Student Accommodation 

Existing Student Accommodation 



We then used the Central Statistics Office (CSO) 2016 Census and established the population of each electoral division within the 1 km radius and calculated the total population of the given 1 km area. (See Table 5.1.)

Population (2016) by Electoral Division	
Electoral Division	Population
Crumlin B, Dublin City	2,968
Crumlin C, Dublin City	2,331
Merchants Quay C, Dublin City	3,566
Merchants Quay D, Dublin City	2,185
Merchants Quay E, Dublin City	2,489
Merchants Quay F, Dublin City	2,158
Ushers C, Dublin City	3,983
Ushers D, Dublin City	2,188
Ushers E, Dublin City	1,790
Ushers F, Dublin City	3,484
Total Population	c. 29,158

Table 5.1: Population of Electoral Divisions within the 1 km radius. (Source: 2016 Census, CSO, annotated by TPA, 2018.)

*We note that 2 No. electoral divisions to the south were excluded from the map, as the majority of the division was not included within the 1 km radius boundary.

We then calculated the Student Population percentage for the area within the 1 km radius of the 2 No. permitted Student Accommodations (Blackfield Lane and Cork Street Locations.) (See Table 5.1.)

Blackfield Lane Student Accommodation	= 280 No. bedspaces	= 462 No. bedspaces	$\frac{462 \text{ (Bedspaces)}}{29,158 \text{ (Electoral Division Population)}}$ $= 0.0158 \times 100 = 1.5\%$
Cork Street Student Accommodation	= 182 No. bedspaces		

Table 5.2: Total student population with permitted developments. (Source: TPA extrapolated from DCC Planning Search, 2019.)

Therefore, there is currently a student population of c. 1.5% within the given 1 km radius, based on the number of bed spaces provided at Blackfield Lane and Cork Street.

The proposed development intends to provide 317 No. bedspaces. This would therefore result in a total student population of c. 2.7%. (See Table 5.3.)

Blackfield Lane Student Accommodation	= 280 No. bedspaces	= 781 No. bedspaces	$\frac{781 \text{ (Bedspaces)}}{29,158 \text{ (Electoral Division Population)}}$ $= 0.0267 \times 100 = 2.7\%$
Cork Street Student Accommodation	= 182 No. bedspaces		
Rialto Cinema Student Accommodation	= 319 No. bedspaces		

Table 5.3: Total student population with proposed development. (Source: DCC Planning Search, annotated by TPA, 2019.)

In our planning opinion, it is considered that c. 2.7% would be a low percentage of student population.

Therefore, in our planning opinion, the proposed Student Accommodation would not result in the overconcentration of Student Accommodation within the 1 km radius of the subject site.



6.0 STRATEGIC POLICY

6.1 *Project Ireland 2040 – National Planning Framework (2018)*

The *National Planning Framework*, published in February 2018, sets out a strategic development framework for the Country to 2040. Among its key messages is the need to provide the highest possible quality of life for people and communities via well designed and managed built and natural environments.

With particular respect to student accommodation development, the *NPF* references the following:

“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.”

[Our emphasis.]

The proposed development, in our planning opinion, complies with the *National Planning Framework, 2018* considering that the development of purpose-built student accommodation will support the rental market in reducing the pressure on demand for low rental accommodation in areas located within close proximity to Third-level education areas and the city as a whole.

As the development is located within close proximity to the city centre, accessible by cycling and by foot to the varying types of public transportation routes which link with Griffith College, Trinity College, University College Dublin, Dublin City University and Technological University Dublin (former DIT) Grangegorman Campus and is easily accessible by cycling routes, it is considered that the proposed development would provide a central location for students around the city.

6.2 *Eastern and Midlands Regional Spatial and Economic Strategy 2019*

The Eastern and Midlands Regional Assembly adopted the final version of the *Regional Spatial and Economic Strategy (RSES)* in late June 2019. The RSES is a strategic plan and investment framework to shape the future development and to better manage regional planning and economic development throughout the Region. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives.

The RSES makes note of the need for the intensification of brownfield sites in the existing urban areas. This is set out in the Regional Policy Objective 4.3:

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that



the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

The RSES also highlights that the recent trends in the delivery of specialised housing typologies such as student accommodation and shared accommodation is indicative of the change in approach that will be necessary to accommodate the changes in demand and demographics in the Region into the future. We support that the subject development proposal is consistent with the policy objectives of the RSES.

6.3 Part V of the Planning and Development Act 2000: Guidelines (2017)

As outlined within the Development Plan, student accommodation is exempt from Part V provisions.

6.4 Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)

Rebuilding Ireland was launched in 2016 with the aim of addressing ongoing supply issues for residential accommodation in Ireland. The overarching aim of the *Action Plan* is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs.

The *Action Plan* outlines the Action 4.7, which states that the Department of Education and Skills would:

“...Prepare and publish a national student accommodation strategy, which will set out a broad framework for delivery of an enhanced level of accommodation and which will inform local authority housing strategies and the land management process in general, in order to provide suitability located and affordable sites.”

This Action has an objective to:

“Develop a national policy on specific needs and mechanisms for the development of appropriate on-campus and off-campus student accommodation.”

Action 4.8 outlines the following action that will take place to:

“...Work with stakeholders to prioritise and progress viable projects to provide additional student accommodation in key urban areas.”

The Action has the objective to:

“Bring on stream proposals capable of delivering an additional 7,000 student accommodation place by end of 2019, on or off-campus, in addition to projects already committed to.”



Action 4.13 states that the Government will:

“...Enable student accommodation projects for 100 units or more to go straight to An Bord Pleanála, as well as maximise the opportunities for joint venture projects on local authority sites to proceed through the Part 8 process and prepare guidance on planning policies around student accommodation developments.”

This is designed with the objective to:

“...Enhance certainty and reduce delivery timescales and costs associated with bringing student accommodation proposals forward.”

6.5 National Student Accommodation Strategy, 2017 – a 60% demand:supply gap

Published in July 2017, the *National Student Accommodation Strategy* was developed by the Department of Education and Skills and the Department of Housing, Planning and Local Government, respectively, to introduce measures to increase and the delivery of purpose-built student accommodation (PBSA).

As outlined within the Report, the need for PBSA bed spaces within Dublin in 2017 was in excess of 30,289 No. bed spaces, while the supply was of PBSA bed spaces was only 12,432 No., which leaves a gap of almost 60% between the demand and available supply.

The Report estimates that by 2019, there will be an excess demand of 35,913 No. bed spaces needed, while the supply will only have grown to 18,142 No. bed spaces - a gap of nearly 50% between the demand and available supply.

Additionally, the gap will continue to grow by 2024 where the projected demand of PBSA bed spaces will be an excess of 75,640 No. bed spaces, while only 54,654 bed spaces are projected to be available in 2024, according to the Strategy. Thus in 2024 a gap of c. 20,000 student bedspaces will still exist.

The Strategy provides targets to increase the supply of purpose-built student accommodation (PBSA). These goals include:

- The construction of at least 7,000 No. additional PBSA beds by the end of 2019; and
- Construction of 21,000 No. additional PBSA spaces by 2024 over the baseline figure of 33,441 PBSA spaces, which are currently available.

As noted in the Strategy it is projected that for every 4 No. students that decided to use either PBSA or Digs, this will free up an additional housing unit in the private rental sector (page 9 of the Strategy). This would result in an impact of 21,000 No. student accommodation beds and 1,500 No. digs' spaces would free up to an additional 5,000 No. rental units.

This will contribute drastically to the current rental crisis within Dublin and other rental pressure zones throughout the country.

We submit that the proposal for a student accommodation facility will contribute to address



the acute shortage of student accommodation beds to cater for the demand.

6.4 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, May 2009

The aim of the Guidelines is to set out the planning principles that should be reflected in development plans and local area plans and guide the assessment of planning application for residential developments.

Specifically, the Guidelines promote the development of high-quality places which seek to provide the following key goals:

- *“Prioritise walking, cycling and public transport, and minimise the need to use cars;*
- *Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;*
- *Provide a good range of community and support facilities where and when they are needed and that are easily accessible;*
- *Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;*
- *Are easy to access for all and to find one’s way around;*
- *Promote the efficient use of land and of energy, and minimise transport demand;*
- *Promote social integration and provide accommodation for a diverse range of household types and age groups;*
- *Enhance and protect the green infrastructure and biodiversity; and*
- *Enhance and protect the built and natural heritage.”*

Additionally, the Guidelines specifically reference the promotion of high-quality designs.

In our opinion, the proposed development is fully aligned with the principles set in the *Guidelines*.

6.6 The Planning System and Flood Risk Management (2009) – Flood Zone C

The key stated objectives of the *Guidelines* are set out at Table 1.6:



Objectives of the Guidelines

- 1.6 The core objectives of the Guidelines are to:
- :: Avoid inappropriate development in areas at risk of flooding;
 - :: Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
 - :: Ensure effective management of residual risks for development permitted in floodplains;
 - :: Avoid unnecessary restriction of national, regional or local economic and social growth;
 - :: Improve the understanding of flood risk among relevant stakeholders; and
 - :: Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

Figure 6.1: Extract of the *Planning System and Flood Risk Management – Guidelines for Planning Authorities, 2009* (p.5).

The Flood Risk Assessment prepared by Murphy Matson O’Sullivan dated 21st January 2019 (carried out in accordance with the requirements of “*The Planning System and Flood Risk Management Guidelines for Planning Authorities*”) 2009 concludes that:

“The flood risk assessment for the Proposed Student Accommodation building has shown the site to be within Flood Zone C and therefore no Justification test is required (...) the development has been demonstrated to be in compliance with the core objectives of the Planning System and Flood Risk Management Guidelines.”

6.7 *Design Manual for Urban Roads and Streets (DMURS), 2013*

The *Design Manual for Urban Roads and Streets (DMURS)*, published by Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government, 2013, provides guidance relating to the design of urban roads and streets. It presents a series of principles, approaches and standards that are necessary to achieve balanced, best practice design outcomes with regard to networks and individual streets.

The design of the proposed development has taken into account the principles set-out by DMURS by encouraging pedestrian and cycling usage and by proposing a development free of car parking. The proposed design increases the existing footpath width in front of the development and provides a dedicated lay-by for set-down on the South Circular Road. The external road network will be unchanged.

Accordingly, we submit that the propose development is compliance with DMURS.



6.8 Other Relevant Policy Documents Considered

The following policy documents prepared by the Department of Education and Science have also been taken into consideration in the preparation of the scheme:

- a) *'Guidelines on Residential Developments for 3rd Level Students Section 50 Finance Act 1999.'*
- b) *'Matters Arising in Relation to the Guidelines on Residential Developments for 3rd Level Students Section 50 Finance Act 1999.'* (July 2005.)

The proposal is in accordance with the provisions included in the above policy documents.

7.0 CONCLUSION

The statement set out herein demonstrates the full compliance of the proposed development with the relevant National, Regional and Local Planning Policy context. The proposed development is consistent with National Policy and is consistent with the *Dublin City Development Plan 2016-2022* Policy. The proposed development represents a high-quality scheme on a strategically-located underutilised brownfield site within Dolphins Barn and is proximate to high quality public transport services and educational institutions.

Compliance is also demonstrated with the policies and provisions of the *Dublin City Development Plan 2016-2022*, which is the key planning policy document at a local level.

At a national and regional level, this statement has demonstrated the compliance of the development with the following:

1. *Project Ireland 2040 - National Planning Framework, 2018.*
2. *Eastern and Midlands Regional Spatial Economic Strategy 2019*
3. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016).*
4. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, May 2009.*
5. *Greater Dublin Area Transport Strategy 2016-2035.*
6. *Design Manual for Urban Roads and Streets (DMURS) (2013).*
7. *National Student Accommodation Strategy, 2017.*
8. *The Planning System and Floor Risk Management (2009).*
9. *Urban Design Manual - A Best Practice Guide (2009).*
10. *Urban Development and Building Heights (2018).*