



## Planning Statement

Proposed Student Accommodation Development at Prussia Street, Dublin 7.

**Client:** Lyonshall Limited

March 2024



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**Connecting places.**



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# Introduction

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## 1.1 Purpose of Statement

This planning statement has been prepared on behalf of Lyonshall Limited and accompanies a planning application for a Large-scale Residential Development (LRD) for the redevelopment the Former IDA Centre, Prussia Street, Dublin 7 for a 373 bed Purpose Built Student Accommodation development. The proposed development will consist of:

*“The demolition of the existing 4 no. warehouse structures to provide for the construction of a 373 bed Purpose-built Student Accommodation development, a ground floor café, and all ancillary site development works.*

*The proposed development will be provided in 2 no. apartment blocks ranging in height from 3-5 storeys over basement and a single terrace of own door studio units, including 43 no. apartments ranging in size from 4-6 bedrooms (250 no. bedspaces), 123 no. studio apartments all served by bicycle parking in a dedicated bike store, bin store, plant rooms, outdoor amenity spaces and internal student amenity facilities, ESB substation, rooftop mounted plant and PV panels.*

*The primary access to the proposed development will be provided from Prussia Street to the east. The proposed development also provides for the alterations of a section of the western boundary wall to facilitate a maintenance access for Dublin City Council from Drumalee Court.”*

This statement outlines and considers the principal planning matters, as well as addressing the issues requests for information highlighted by Dublin City Council during the S.247 Pre-Planning Meetings, the LRD Pre-Consultation Meetings, and subsequent LRD Opinion.

## 1.2 Response to Issues raised S.247, LRD Pre-Consultation & LRD Opinion

In advance of the submission of this LRD application, the proposed development has been the subject of two S.247 Meetings, a LRD Pre-Consultation and the applicants are in receipt of the City Council’s LRD Opinion. This positive engagement with Dublin City Council has allowed for the key issues to be identified and understood and the proposed development has evolved considerably from the initial S247 submission. The applicants have made some significant alterations to the proposed development in order to address the issues raised and these are as follows:

- Reduction in Proposed Height & Internal Set-Backs Within Scheme;
- Updated facade design on Prussia Street to further integrate it into surrounding area;
- Re-organisation of public plaza area and removal of café seating areas to ensure no conflict between vehicles and pedestrians;

- Surface Water Drainage and Landscape proposal updated to ensure there is no impact on the root protection of trees adjoining the site;
- Increased Separation Distance between Block 1 and Block 2;
- Daylight & Sunlight Assessment;
- Justification for Student Accommodation at the location; and,
- Reassessment of Unit Mix.

The Planning Authority will also note that since the LRD Meeting the *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities* (SRDCSG) have been formally adopted. There are no changes from the Draft Guidelines which will materially alter the assessment of the proposed development and in any case the City Development Plan contains similar density ranges and targets for *City – Centre* locations.

The issues regarding the characterisation of the receiving neighbourhood and the appropriate scale and density of new development are issues that urban areas are going to experience throughout the city. For compact growth to be achieved greater densities and higher buildings will have to be constructed and these cannot be accommodated without some impact on the residential amenities of existing properties. The recently published SRDCSG indicate that new developments should provide for an appropriate transition with adjacent buildings and established communities so as to “safeguard their amenities to a reasonable extent”<sup>1</sup>. The design of the proposed development as highlighted in the accompanying Design Statement prepared by O’Mahony Pike Architects contains a detailed assessment of the existing context, identifies the sensitivities and constraints represented by adjoining residential buildings, including Protected Structures located within an Architectural Conservation Area, and provides a comprehensive rationale and justification for the proposed design.

The table below highlights the changes made to the proposed development since the S.247 pre-planning meetings and subsequent LRD pre-consultation meeting. Changes to the design of the proposed development have been made in response to the LRD Opinion, but these alterations have not impacted on the bedspace numbers. The applicants consider that the application and documentation clearly demonstrates that the concerns of the Planning Authority can be addressed without a reduction in bedspace numbers.

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<sup>1</sup> Sustainable and Compact Settlement Guidelines for Planning Authorities pg. 75

	Initial Proposal	Proposed Development
Site Area	0.58 ha	0.58 ha
No. of Bedspaces	411	373
Mix	194 Studios - 47% 217 Cluster Bedrooms - 53%	123 Studios - 33% 250 Cluster Bedrooms - 67%
Plot Ratio	1 : 2.3	1 : 2.0
Density <sup>2</sup> (Unit per hectare)	177	161
Density (Bedspace per hectare)	709	643
Height	5 – 6 Storeys	3 – 5 Storeys with Single Storey Terrace
Amenity Space	2,418 m <sup>2</sup> Internal Amenity 609 m <sup>2</sup> External Amenity 1,809 m <sup>2</sup>	2,378.7 m <sup>2</sup> Internal Amenity 587.4 m <sup>2</sup> External Amenity 1,791.3 m <sup>2</sup>
Amenity Area per Bedspace	5.9 m <sup>2</sup>	6.4 m <sup>2</sup>
Bicycle Parking	346	448
Car Parking	1	1

**Table 1.1. Comparison of Previous & Proposed Scheme**

Outlined below is a brief overview of the applicant’s response to some of the key items raised in the LRD Opinion, which are further discussed in the submitted Response to the LRD Opinion Report, within this Planning Statement and in the Statement of Consistency prepared by HW Planning.

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<sup>2</sup> Calculated on the basis of 4 bedspaces = 1 units in accordance with Sustainable and Compact Settlement Guidelines for Planning Authorities indicate at page 18



## 1.2.1 Planning Issues

### Unit Mix

The quantum of studio units was raised by the Council in the S.247 pre-planning meeting, and as a result, the unit mix of the proposed development has been amended to include 123 no. studios and 43 no. cluster apartments. The percentage of studios proposed within the scheme has been reduced from 47% as previously proposed to 33%.

As outlined in the pre-planning and LRD pre-consultation meeting, there is still a high demand for studio units in Dublin as many of the permitted and built PBSA's are mainly comprised of cluster apartments. It was suggested in the pre-planning meeting that there is evidence that such studio units can often lead to students feeling socially excluded/lonely. It is considered that the students living in the studio units will not be isolated or feel lonely, as they will still have the option to socialise in the student amenity areas which are located within the proposed development as well as through on-campus societies and gatherings with friends.

It is further considered that the proposed studio units are likely to appeal to more mature or international students who would have a preference for private accommodation over a cluster apartment arrangement. These students would typically have resided in private rented accommodation; therefore, the proposed development will free up such accommodation for the wider private rental market.

Based on a review of existing and proposed PBSA schemes, there is a significant undersupply of studio units within the market, with studios representing just 4% of the current private PBSA stock. While studio units are desirable for all student demographics, they are typically occupied by a higher proportion of post-graduate and international students who prefer these types of units, especially within PBSA schemes; the extensive amenity spaces within the schemes provide the spaces where students living in studios can socialise, study and exercise with other residents. Latest figures indicate the current supply of international students in Dublin City is c18,000 per year and post graduate students comprise c15,000 per year. With only c.360 studio beds currently provided, there is a significant need for an increase in this particular type of stock to match an evolving student demographic.

The following are the key benefits of the proposed unit mix:

- There is a recognised shortfall of high-quality student studios in Dublin, resulting in students who want this sort of accommodation to rent residential properties, competing with non-student renters and increasing rents for e.g., young professionals or couples.
- Students who want privacy may prefer a studio, with their own kitchen, to a bedroom in a larger apartment. This offering will help attract higher value and mature customers to TU Dublin, Royal College of Surgeons, Griffith College, and Trinity College, particularly in a post-COVID world.

### Student Demand and Concentration

In the S.247 meeting the Council requested that the concentration of Student Accommodation in the area surrounding the site should be assessed so as not to lead to an over concentration of this use. Further to this, the Council requested in the LRD pre-consultation meeting that Student Demand and Concentration Assessment be prepared.

In compliance with the LRD Opinion an updated Student Demand and Concentration report prepared by HW Planning accompanies this submission and concludes that the current student concentration within the study area is 11%. Once the proposed development is completed, this

average will increase by 1.2% to 12.2%. Given the subject sites proximity to the TUD Grangegorman Campus and TCD, this is a typical figure. For comparison, 12.1% of people living within 1km of Trinity College Dublin were students in 2022 and we do not consider that the proposed development will result in an overconcentration of students in this area.

The Council will note that Dublin is Ireland's largest university locality, catering to approximately 140,000 students annually, making it one of the largest student cities across the UK and Europe. More specifically, Dublin City and the area between the canals currently caters to approximately 75,000 of these students, with an estimated 80% of these being full-time students (i.e. 60,000). Despite Dublin City being one of Europe's main University locations, private PBSA supply remains low when compared with other university cities, with only c.9,000 beds currently operational and under development (ratio of 6.7:1 full time student per bed).

### **Design**

In the LRD pre-consultation meeting, the Council requested that the design team revert back to the original design for the proposed building facing out onto Prussia Street as it was considered that it was more of a sympathetic approach and would integrate better with the existing streetscape.

A variation of brick fenestration has been used throughout the proposed development to break up the massing, as well as ensuring that the building will integrate into the existing streetscape. The predominant finish on the proposed development is red brick which is typical for the area, and it was acknowledged by the Council that this was their preferred material in the LRD pre-consultation meeting. Careful attention has been given to the building's footprint, gable ends and materials, to both enhance the legibility of the volume of the building (in keeping with the simplicity of historical properties in the vicinity of the site) and to introduce rhythm and visual interest within the site. This is highlighted in greater detail in the Architectural Drawings and Architectural Design Statement prepared by O'Mahony Pike Architects.

### **Impact on Residential Amenity**

In order to improve the relationship between the proposed development and the adjacent properties in Drumalee Court and 56 to 59 Prussia Street, alterations have been made to the proposed development and the impact of the proposed development on adjacent properties has been assessed in terms of sunlight, daylight and overshadowing.

The revised scheme makes provision for alterations to the eastern section of Block 2, and which is 3 metres lower than the previous proposal in order to improve the relationship to the rears of 56 – 59 Prussia Street.

The Sunlight and Daylight Access Analysis Report prepared by ARC assesses the impact of the proposed development, and the impacts are predominantly negligible to minor. However, there are some impacts as would be expected with the redevelopment of a low-density brownfield site, but we consider that these impacts are reasonable and acceptable in this urban context.

Given the height of proximity of the proposed residential blocks the Planning Authority highlighted the concerns regarding the residential amenity of existing properties and future residents, particularly with regard to Daylight/Sunlight access with specific reference made to the existing properties at Drumalee Road, Drumalee Court and Prussia Street.

As highlighted in the accompanying Design Statement the width of the lane between proposed Blocks 1 and 2 has been increased from pre-planning to LRD pre-consultation stage from the previously proposed 6 metres to a width ranging from 9.5 – 11 metres which increases daylight

access to the future occupants of the scheme. This compares favourably to the neighbouring 10 metre lane width permitted on the Park Shopping Centre development, ABP-309657-21.

The height of the proposed development has been designed to ensure that there is no overbearance on properties surrounding the application site. Taller elements of the scheme are focused towards the centre of the site which will ensure that the outlook of surrounding properties is not compromised, while also ensuring that they continue to receive adequate daylight/sunlight.

### **Daylight/Sunlight**

The Planning Authority raised concerns in the LRD pre-consultation meeting regarding daylight/sunlight to the sunken courtyard in Block 2 of the proposed development, and that it should be removed from the open space calculations. This is as a result of the shape of the site which puts restrictions on the site layout. We wish to highlight to the Council that even low buildings on the site will cast shadows and would therefore not improve the daylight/sunlight access to this space.

As indicated in a number of sections throughout the BRE Guide, “natural lighting is only one of many factors in site layout design” so the disadvantages that perimeter blocks found in courtyard developments such as the proposed development can have for sunlight access must be weighed up against the advantages of this layout for future residents of the courtyard blocks (e.g. privacy, increased passive supervision, security, enclosure, etc.). Lower levels of sunlight access is typical in the courtyard form of development, which is commonplace in medium to high density development and is becoming ever increasingly commonplace in Dublin and other cities. It should also be noted that in addition to courtyard spaces, the proposed development includes a number of other large open spaces, which receive a high degree of sunlight access. This means that there will always be an area where residents and visitors to the scheme can go to sit and enjoy the sunshine on a sunny day so their residential amenity is not compromised so the residential amenity of the future occupiers of the scheme will not be compromised as a result of the proposed development.

The submitted Sunlight and Daylight Access Analysis prepared by ARC demonstrates the proposed units comply with the relevant guidelines.

### **Ecology**

As requested by the Council, an Environmental Impact Assessment Screening Report, Appropriate Assessment Screening Report as well as an Ecological Impact Assessment has been prepared and submitted with this planning application which confirms that the proposed development will not impact its receiving environment.

#### **1.2.2 Conservation Issues**

At the LRD Meeting the Council highlighted concerns that the height of the proposed development may be visually dominant when viewed from the areas surrounding the site and the potential impact on the character of the Conservation Area, and the Church of the Holy Family.

The accompanying Design Statement prepared by O'Mahony Pike and Townscape and Visual Impact Assessment prepared by Modelworks assess in detail the visual impact of the proposed development on the adjacent Prussia Street ACA and Church of Holy Family. Overall, we consider that the proposed changes reduce the visual dominance of the proposed development and ensures that it integrates well within the existing and emerging character of the area.

#### **1.2.3 Transportation Issues**

The Council raised concerns with the issues raised in the Road Safety Audit. These related to the auto-track for the fire tender and refuse vehicles. As a result, the landscape masterplan has been

amended so that no conflicts arise, and the seating proposed to serve the café have now been removed.

#### **1.2.4 Drainage Issues**

A number of concerns were raised in the LRD pre-consultation meeting with regard drainage. In response, no attenuation tanks have been provided within the site and natural based SuDS measures such as detention basins, swales, rain gardens and permeable paving have been incorporated into the design of the proposed development. Green and blue roofs have also been integrated into the proposed building design.

#### **1.2.5 Parks, Biodiversity and Landscape Issues**

In the LRD pre-consultation meeting, the Council raised concerns with the impact of the proposed development on the trees adjoining the western boundary of the site (T7 and tree group 13), despite them being located outside of the site. We wish to highlight that the T7 tree will not be impacted by the proposed development. The canopy of the tree is approximately 3-3.5m from the building line, therefore ensuring that the tree will not be impacted. Some pruning works may be required to the tree crown to facilitate the proposed development; however, Charles McCorkell Arboricultural Consultancy has confirmed that this will not have an impact on the condition of the tree.

# Site Context and Proposed Development

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## 2.1 Site Location and Context

The proposed development site at Prussia Street, Dublin 7 was previously used as an IDA (Industrial Development Agency) Centre whose aim was to support and develop businesses and enterprises in Dublin. The proposed development site is a typical brownfield site which consists of galvanised roofed buildings which accommodated a range of light industrial uses. The site is paved with concrete and does not contain any vegetation of conservation or biodiversity value. The site is currently vacant and underutilised and is in close proximity to the Grangegorman TU Dublin Campus as well as Dublin City Centre.

Prussia Street is located in Stoneybatter which is a vibrant neighbourhood on the north side of Dublin City. The area surrounding the site is generally comprised of a mix of unit types including two storey houses, 3 to 4 storey apartment complexes with a 4 storey Georgian building to the north<sup>3</sup>.



Figure 2.1. Aerial View of the Site and Surrounding Context

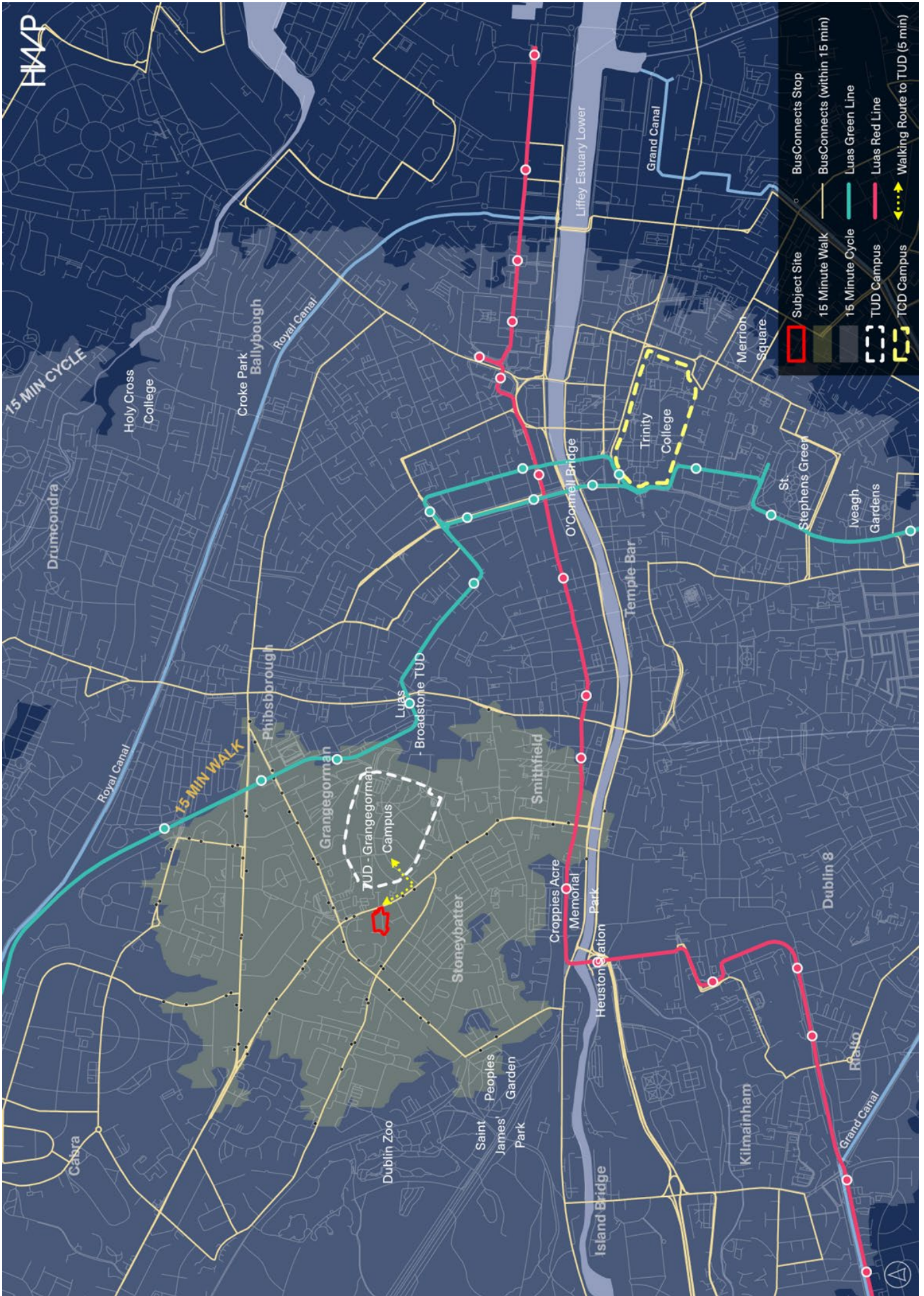
Prussia Street is located on the western side of the Grangegorman Strategic Development Regenerations Area (SDRA) linking Stoneybatter Village to North Circular Road. This key thoroughfare provides for significant strategic development opportunities through the regeneration

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<sup>3</sup> Former City Arms Hotel.

of a number of vacant and underutilised sites for mixed use development including the application site.

The site is within walking distance of the Technological University Dublin (TU) Grangegorman Campus (5-minute walk) and within cycling distance of Trinity College (11-minute cycle). The Phibsborough Luas stop is located a 13-minute walk from the site which connects from Broombridge in the north, through the City Centre and out as far as Brides Glen to the south. In addition, a number of bus routes also serve the site including Dublin Bus no's. 37, 39, 39a, 70 and 70n connecting the site to Dublin City Centre, Blanchardstown, UCD and Dunboyne, making the site a highly accessible location (see Figure 2.2).



## 2.2 Proposed Development

### 2.2.1 Design

The design of the proposed development has been influenced by the following factors:

- Strengthen the local fabric of Prussia Street;
- Inclusion of an active frontage onto Prussia Street;
- Make the most efficient use of this underutilised inner city site;
- Protect the residential amenity of surrounding properties;
- Provide a high-quality environment for future occupants of the scheme.

The scheme proposes two distinct blocks, wrapping around a series of courtyards and gardens. On Prussia street, the scheme presents a simple elevation animated by a café at ground floor level with a pedestrian and cyclist access into the site from Prussia Street further activating this part of the streetscape.

The apartment blocks have been designed and organised to respond to the site context and stepdown at gable junctions and not include any direct windows. This ensures that the proposed development will not impact on the residential amenity of surrounding properties surrounding the site.



Figure 2.3. Contiguous Elevation of the Development as Viewed from Prussia Street

#### Student Amenity Space

The scheme provides a host of on-site facilities such as generous indoor and outdoor amenity spaces. It offers high quality student living accommodation with spacious and well-lit communal areas throughout the ground floor and semi-basement.

#### Urban Design/Landscape Strategy

The design approach to the communal open spaces has been prepared by Doyle + O'Troithigh Architects to inclusive and to accommodate a range of uses which will serve the future students



occupying the site while ensuring that SuDs features are also incorporated and do not impact on the condition of the adjoining trees along the western boundary. The design of the Prussia Street communal open spaces includes the following objectives:

- Manipulating the external environment to enhance the outdoor experience for all students;
- Working with the site settings, topography and aspect, considering the influence of the elements and positioning amenity areas with the sun in mind will allow us to add value to the landscape;
- Providing external areas which can be used year-round, adding value to the development, and more importantly acting in a positive way toward the creation of a community spirit and sense of ownership;
- Enhancing the biodiversity and ecological value of the site;
- Develop open space networks, connectivity, and legibility (Making connections) between each of the communal open spaces;
- The development of landmarks, focal points, and vistas, and
- Landscape management post construction.

Further to this, we wish to highlight to the Council that the landscape proposal has incorporated biodiversity into the overall landscape design. Features such as native planting, SuDS features, self-clinging climber plants to promote urban greening within the site, planting of semi-mature trees as well as the inclusion of green and blue roofs have been incorporated to enhance the biodiversity of the site.



Figure 2.4. CGI View of Internal Amenity Space Within the Site

### 2.3 Key Site Statistics

Key Site Statistics	
Site Area	0.58ha
No. Units	166 apartments/373 no. bedspaces
Cafe	55.4 sq.m
Site Coverage	52.5%
Plot Ratio	1:2.0
Internal Amenity Space	587.4 sq.m
Open Space	1,448.4 sq.m
Density	161 Units per Hectare (Based on Methodology of 4 bedspace = 1 unit)*
Car Parking Spaces	N/A
Cycle Parking Spaces	452 no. spaces (4 no. spaces to serve café)

# Planning Policy Context

This section of the Report will discuss the main planning policies which pertain to the application site, and a more detailed review of National, Regional and Local Planning Policy is provided within a separate Statement of Consistency.

## 3.1 Dublin City Council Development Plan 2022-2028

The Dublin City Council Development Plan 2022-2028 is the relevant statutory Development Plan for the area.

### 3.1.1 Zoning

The subject site is zoned 'Z4 – Key Urban Villages/Urban Villages', the objective of which is 'to provide for and improve mixed-services facilities.', and within which student accommodation is an 'open to consideration'.

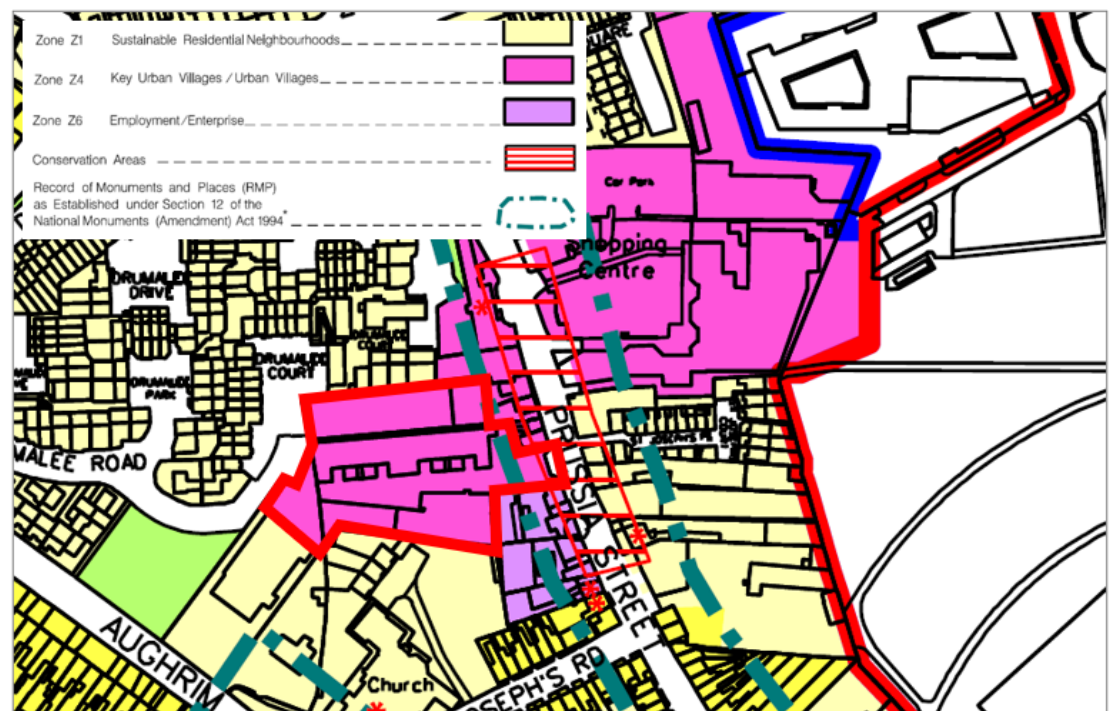


Figure 3.1. Extract from Map 8 of the Dublin City Development Plan with Site Outlined in Red

As outlined in the Development Plan, these areas function to serve the needs of the surrounding catchment providing a range of retail, commercial, cultural, social and community functions that are easily accessible by foot, bicycle, or public transport in line with the concept of the 15-minute city.

We note that the site is not located in a Key Urban Village as identified in Map K, so it is considered that the site is classified as an Urban Village. The following general principles is outlined in the Development Plan therefore apply:

- **Mixed-Use:** Promote an increased density of mixed-use development including residential development with diversity in unit types and tenures capable of establishing long-term integrated communities.
- **Density:** Ensure the establishment of higher density development capable of sustaining quality public transport systems and supporting local services and activities. Encourage the development/redevelopment of under-utilised sites and intensification of underutilised areas such as surface parking. Opportunity should be taken to use the levels above ground level for additional commercial/retail/services or residential use.
- **Transport:** Ensure provision is made for quality public transport systems. Provide improved access to these systems and incorporate travel plans, which prioritise the primacy of pedestrian and cyclist movement and address the issue of parking facilities and parking overflow. Ensure that enhanced connectivity and permeability is promoted.
- **Commercial/Retail:** Promote the creation of a vibrant retail and commercial core with animated streetscapes. A diversity of uses should be promoted to maintain vitality throughout the day and evening.
- **Community and Social Services:** Encourage these centres to become the focal point for the integrated delivery of community and social services.
- **Employment:** Encourage the provision of employment uses incorporating office, work hub, live-work units, professional and financial services, and the creation of small start-up units.
- **Built Environment:** Ensure the creation of high-quality, mixed-use urban districts with a high quality public realm, distinctive spatial identity and coherent urban structure of interconnected streets and child-friendly, accessible public spaces and urban parks. Development should have regard to the existing urban form, scale and character and be consistent with the built heritage of the area.

From a zoning perspective, the use of the site for a café and student accommodation (mixed-use) is considered acceptable given the proximity of the site to the Grangegorman TU Dublin Campus and Dublin City<sup>4</sup>. The high-quality design of the proposed development does not only achieve higher densities, but also provides generous outdoor garden areas which will serve the future occupants of the scheme. In terms of accessibility, the site is within walking distance of the Technological University Dublin (TU) Grangegorman Campus, cycling distance of Trinity College and within walking distance of Phibsborough Luas stop. In addition, a number of bus routes also serve the site from existing bus stops on Prussia Street. The café as proposed will address Prussia Street creating an active frontage and integrate the proposed development with the wider area surrounding the site.

Section 14.6 of the Dublin city Development states that:

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<sup>4</sup> Many third-level institutes are included in Dublin City such as Griffith College, Trinity College and the Royal College of Surgeons in Ireland (RCSI).

*“The land-use zoning objectives and control standards show the boundaries between zones. While zoning objectives and development management standards indicate the different uses permitted in each zone, it is important to avoid abrupt transitions in scale and land-use between zones. In dealing with development proposals in these contiguous transitional zone areas, it is necessary to avoid developments that would be detrimental to the amenities of the more environmentally sensitive zones. For instance, in zones abutting residential areas or abutting residential development within predominately mixed-use zones, particular attention must be paid to the use, scale, density and design of development proposals, and to landscaping and screening proposals, in order to protect the amenities of residential properties (see also Appendix 3: Achieving Sustainable Compact Growth Policy for Density and Building Height in the City, Chapter 4: Shape and Structure of the City, and Chapter 15: Development Standards for guiding principles regarding criteria such as height, density, urban design).”*

The proposed development is located in an area zoned ‘Z4-Key Urban Villages/Urban Villages’ which is adjacent to lands zoned ‘Z1 – Sustainable Residential Neighbourhoods’ and ‘Z6 – Employment/Enterprise’. It is considered that the use of the proposed development as Student Accommodation, is compatible with these zoning objectives, and the design of the proposed development will ensure that there is no impact on the residential amenity of surrounding properties.

The scale, density and design is considered appropriate, as highlighted in Section 4 of this Report.

### **3.1.2 Large Scale Developments**

Objective CU025 requires developments in excess of 10,000sq.m net area to provide a minimum of 5% of the overall floorspace to provide for community, arts and cultural spaces which would include exhibition, performance and artists workspaces.

Compliance with this objective was discussed at LRD pre-consultation meeting and is contained within the LRD Opinion. Following the LRD Meeting the applicants engaged with Mr. Kieran Sweeney, Senior Planner and the floor area of the proposed development was submitted to the Planning Authority for review. As the proposed development has a net floor area of 9,403 sq.m it is considered to be below the threshold for the application of Objective CU025 and which was confirmed by the Planning Authority.

## **3.2 Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities**

The *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities* (SRDCSG) were formally adopted in January 2024. There are no changes from the Draft Guidelines which will materially alter the assessment of the proposed development and in any case the City Development Plan contains similar density ranges and targets for *City – Centre* locations.

The Guidelines recommend densities in the range of 100 dph to 300 dph in *City – Centre* locations within the canal belt such as the proposed development and as illustrated in Figure 3.2, whereas the Dublin City Development Plan recommends net densities of 100-250 dph. .

The accompanying Statement of Consistency and the Design Statement prepared by O’Mahony Pike provides further assessment and demonstrates how the proposed development complies with all S.28 Ministerial Guidelines including the recent ones.



Figure 3.2. Location of Site with Canal Belt

# Assessment

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## 4.1 Key Planning Issues

### 4.1.1 Student Accommodation

Policy QHSN44 of the City Development Plan aims to ensure that there is not a proliferation or concentration of student accommodation in the City, stating

**Policy QHSN44** – Built 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.”*

In compliance with this policy Chapter 15 of the City Development Plan, Development Standards, requires that applications for student accommodation be accompanied by an assessment to demonstrate that there is not an over-concentration of student accommodation within an area. Chapter 15 requires the provision of a map showing all such facilities within 1km of a proposal and documentation outlining how the scheme will be professionally managed.

Dublin is Ireland’s largest university locality, catering to approximately 140,000 students annually, making it one of the largest student cities across the UK and Europe. More specifically, Dublin City and the area between the canals currently caters to approximately 75,000 of these students, with an estimated 80% of these being full-time students (i.e. 60,000) (See Table 4.1).

Despite Dublin City being one of Europe’s main University locations, private PBSA supply remains low when compared with other university cities, with only c. 9,000 beds currently operational and under development (ratio of 6.7 : 1 full time students per bed). At the time of writing this report, this stock is already at 75% occupancy for academic year 2024/2025 (including 100% of all studio units), considerably ahead of where it is in similarly sized UK University cities which was confirmed by operators of PBSA in Dublin.

University	Mobile	International	Post-Graduate	Total No. Enrolled Students
NCAD	685	85	135	1355
RCSI	3675	2385	2025	4825
TCD	12430	5920	6080	19795
TUD	7677	1377	3535	16828
Other <sup>5</sup>	N/A	7352	2557	32880
<b>Total</b>	<b>24467</b>	<b>17119</b>	<b>14332</b>	<b>75683</b>

Table 4.1. Overview of Student Population in Dublin (Higher Education Authority)

The proposed development contains a total of 373 no. student bedspaces, which is considered appropriate given the site's location, and the ever-increasing demand for new purpose-built student accommodation in close proximity to Third-Level Institutes. The preliminary assessment of Student Accommodation in the area surrounding the site confirms that the site will not lead to the proliferation and concentration of student accommodation at this location. A Student Demand and Concentration report accompanies this planning application, and which indicates that:

*"11% of the population within the defined catchment aged 15 and over are students. Once the proposed development is completed, this average will increase by 1.2% to 12.2%. Given the subject sites proximity to the TUD Grangegorman Campus and TCD, this is a typical figure. For comparison, 12.1% of people living within 1km of Trinity College Dublin were students in 2022."*

Policy HQS45 highlights that the 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.

Policy QHS45 – Third-Level Student Accommodation states:

*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*

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<sup>5</sup> Griffith College, DBS, Law Society, NCI, IBAT, Dorset College, CCT, Independent College, ICD, American College and Kings Inns.



*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.*

As previously outlined, the site is within walking distance of the Technological University Dublin (TU) Grangegorman Campus and within cycling distance of Trinity College. The Phibsborough Luas stop is located a 13-minute walk from the site which connects from Broombridge in the north, through the City Centre and out as far as Brides Glen to the south. In addition, a number of bus routes also serve the site making the site highly accessible by public transport. In addition, it is considered that the proposed development has been designed to make the most efficient use of the site while respecting the residential amenity of surrounding properties in accordance with this policy.

The project architects OMP Architects have had full regard to the standards as included in the Department of Education and Science's Guidelines on Residential Development for Third Level Students (1999), the provisions of the National Student Accommodation Strategy (2017), Circular PL8/2016 and the Dublin City Development Plan 2022-2028 and have included the necessary internal and external tenant amenities and facilities to support students as required, which has resulted in a high-quality design. A housing quality audit is submitted showing full compliance with these standards.

### **Unit Size/Mix**

As outlined in the Development Plan, purpose-built student accommodation is typically provided on a 'cluster' type model comprising of a group of bedrooms and a shared kitchen / living/ dining space. It is also acknowledged that studio units may also be considered acceptable in larger student accommodation schemes such as the proposed development where it is stated:

*"An alternative 'studio' model may also be considered in certain circumstances within a larger student accommodation scheme. These studio units can accommodate single or double occupancy and shall comprise of en-suite bathroom facilities and private kitchenettes/cooking facilities. These studio units shall provide a minimum of 25 sq. m. and a maximum gross floor area of 35 sq. m."*

A total of 123 no. studio apartments and 43 no. cluster apartments are included in the proposed development. The quantum of studio units was queried by the Council in the pre-planning meetings, LRD pre-consultation meeting and LRD Opinion, and as a result, the unit mix of the proposed development was amended to reduce the quantum of studios from 194 to 123 no. studios. Therefore, the percentage of studios proposed within the scheme has been reduced from 47% as initially proposed to 33%. The number of studios proposed is acceptable and required given the need for additional studio units in Dublin.

As outlined above, there is still a high demand for studio units in Dublin as many of the permitted and built PBSA's are mainly comprised of cluster apartments. It was suggested in the pre-planning meeting that there is evidence that such studio units can often lead to students feeling socially excluded/lonely. Operators have confirmed that studio units are most suitable for students seeking more privacy and those who may need to work while enrolled in college. It is considered that the students living in the studio units will not be isolated or feel lonely, as they will still have the option to socialise in the student amenity areas which are located within the proposed development as well as through on-campus societies and gatherings with friends.

Operator/Address	Cluster Units	Studio Units	% Studio Units	% Studio Occupied <sup>6</sup>	Total Bedspaces
Yugo – Brewers Close	181	54	29.8	76	235
Yugo – Dominick Place (Phase 1 + 2)	295	29	8.95	100	324
Yugo – Highfield Park	370	32	7.96	100	402
Yugo – Ardcairn House	547	24	4.2	100	571
Yugo – The Tannery	296	0	N/A	N/A	296
Yugo – Kavanagh Court	536	72	13.4	100%	608
Yugo – New Mill	347	53	15.27	100%	400
Yugo – Broadstone Hall	101	0	N/A	N/A	101
Aparto – The Loom	166	0	N/A	N/A	166
Aparto – Dorset Point	447	0	N/A	N/A	447
Aparto – Beckett House	393	0	N/A	N/A	393
Aparto – Binary Hub	471	0	N/A	N/A	471

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<sup>6</sup> As of 27<sup>th</sup> of February 2024

Mezzino – Cork Street	281	0	N/A	N/A	281
Mezzino – Highfield House	289	0	N/A	N/A	289
Mezzino - Stoneybatter	138	4	2.81	100	142
Fresh - Parkgate	316	3	0.94	100	319
Fresh – Thomas Street	257	0	N/A	N/A	257
HERE – Cork Street	374	25	6.26	100	399
NIDO – Ardee Point	365	3	0.81	100	368
Scape – Aungier Street	278	20	6.71	100	298
LIV – Church Street	232	0	N/A	N/A	232
Heyday – Caramans Hall	207	0	N/A	N/A	207
Host – Point Campus	956	10	1.04	100	966
Swuite - Grangegorman	121	1	0.81	100	122
Hubble - NCI	101	0	N/A	N/A	101
<b>Total</b>	<b>8395</b>	<b>330</b>	<b>3.9%</b>	<b>100%</b>	<b>7786</b>

Table 4.2. Overview of Occupied Student Accommodation in Dublin (Within Canal Belt)

Based on a review of existing and proposed PBSA schemes, there is a significant undersupply of studio units within the market, with studios representing just under 4%<sup>7</sup> of the current private PBSA

<sup>7</sup> Total of 83950 private PBSA bedspaces, 330 of these are studio units.

stock as evidenced in the table. This trend and undersupply is set to continue in the short term with just under 5% of the permitted PBSA or those under construction within the canals being studio units as evidenced in Table 4.3 below.

Operator/Address	Cluster Units	Studio Units	% Studio Units	Total Bedspaces
Marlet – Prussia Street	197	0	N/A	197
Novel – 124-126	231	26	10.11	257
HERE – Blackhall Place	192	0	N/A	192
29-31 Prussia Street	238	0	N/A	238
The Park Shopping Centre	556	28	4.79	584
Rialto Cinema	284	33	10.41	317
<b>Total</b>	<b>1698</b>	<b>87</b>	<b>4.87%</b>	<b>1785</b>

**Table 4.3. Overview of Under Construction/Permitted Student Accommodation in Dublin (Within Canal Belt)**

While studio units are desirable for all student demographics, they are typically occupied by a higher proportion of post-graduate and international students who prefer these types of units, especially within PBSA schemes; the extensive amenity spaces within the schemes provide the spaces where students living in studios can socialise, study and exercise with other residents. Latest figures indicate the current supply of international students in Dublin City is c.18,000 per year and post graduate students comprise c.15,000 per year. With only c. 206 studio beds currently provided which are fully occupied<sup>8</sup>, there is a significant need for an increase in this particular type of stock to match an evolving student demographic.

Operators consider that the proposed studio units are likely to appeal to more mature students who would have a preference for private accommodation over a cluster apartment arrangement. These students would typically have resided in private rented accommodation; therefore, the proposed development will free up such accommodation for the wider private rental market. The following are the key benefits of the proposed unit mix:

- There is a recognised shortfall of high-quality student studios in Dublin, resulting in students who want this sort of accommodation to rent residential properties, competing with non-student renters and increasing rents for e.g., young professionals or couples.

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<sup>8</sup> Based on an assessment of existing PBSA carried out by HW Planning.

- Students who want privacy may prefer a studio, with their own kitchen, to a bedroom in a larger apartment. This offering will help attract higher value and mature customers to TU Dublin, Royal College of Surgeons, Griffith College, and Trinity College, particularly in a post-COVID world.

Specific bedroom and communal space standards apply to the proposed development as follows:

Bedroom Type	Bedroom Size (min)	Bedroom Size including En-Suite (min)
Single Study	8 sq. m.	12 sq. m.
Twin Study	15 sq. m.	18 sq. m.
Disabled Study	-	15 sq. m.

Figure 4.1. Extract from Table 15-7 Setting Out Minimum Bedroom Sizes for Student Accommodation

All studio and cluster apartments have been designed to meet the minimum size standards as set out in the Development Plan. A housing quality audit prepared by O'Mahony Pike Architects is submitted demonstrating full compliance with these standards.

#### 4.1.2 Density and Building Height

##### Density

Volume 2, Appendix 3, of the City Development Plan defines the City Council's policies for Building Height in Dublin City. The density strategy is defined in Table 1, which sets a target of 100-250 units per hectare in areas within the canal belt which includes the subject site. No building heights are defined but the following is noted:

*'Many of the city's urban villages are underdeveloped and have scope for greater intensification and consolidation. It is acknowledged however, that some of the urban villages have a prevailing low density character and any proposals for increased height and density will need to have regard to the existing pattern and grain of development to ensure sensitive and successful integration with the existing urban fabric.'*

Location	Net Density Range (units per ha)
City Centre and Canal Belt	100-250
SDRA	100-250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

Figure 4.2. Extract from Volume 2, Appendix 3, Table 1 Setting Out Net Density Standards

The proposed development contains 373 no. student bedspaces within 123 no. studio and 43 no. cluster apartments equating to a density of 161 units per hectare<sup>9</sup> (643 bedspaces per hectare).

The Planning Authority will note that in accordance with the recently published Sustainable Residential and Compact Settlement Guidelines 2024 (SRDCS) the proposed development is a 'City Centre' location where densities ranging from 100-300uph shall generally be applied on sites within the canal belt such as the proposed development. The density of the proposed development at 161 units per hectares is therefore within the middle-range when assessed using both the Dublin City Development Plan and SRDCS Guidelines, which is considered appropriate for this site.

Site coverage and plot ratios are other assessment criteria used for assessing appropriate densities and Volume 2, Appendix 3 of the Development Plan contains guidance on these for various areas within the City and as extracted in Figure 4.3 below.

Area	Indicative Plot Ratio	Indicative Site Coverage
Central Area	2.5-3.0	60-90%
Regeneration Area	1.5-3.0	50-60%
Conservation Area	1.5-2.0	45-50%
Outer Employment and Residential Area	1.0-2.5	45-60%

Figure 4.3. Extract from Volume 2, Appendix 3, Table 2 Setting Out Indicative Plot Ratio and Site Coverage Standards

The density of the proposed development is slightly below the indicative standards as outlined in Volume 2, Appendix 3 of the Development Plan. The plot ratio for the proposed development is 1:2, while the site coverage is 52.5% which demonstrates that the proposal does not result in the overdevelopment of the application site.

Dublin City Council will note that this is a redevelopment of a brownfield site in an urban area and the applicants are obliged through National and Regional Planning policy to ensure the most efficient use of this zoned, serviced, and sustainable sites are achieved. As outlined in Section 1.4 of the Building Height Guidelines, density and building height 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.'*

The Council will note that the density of the proposed development when assessed using the metrics of bedspaces per hectare, plot ratio and site coverage is comparable to the SHD granted by An Bord Pleanála<sup>10</sup> in May 2022 for the re-development of a brownfield site located in close

<sup>9</sup> 4 bedspaces equivalent to 1 unit as per the draft Sustainable and Compact Settlement Guidelines (p18).

<sup>10</sup> ABP Reference: 312102-21.

proximity to the application site at 29-31 Prussia Street. This development proposed a student accommodation scheme of 236 bedspaces (828 bedspaces per hectare), with site coverage of 57% and a plot ratio of 1:2.3 which was considered acceptable by the Board when assessing the development, having regard to its location in close proximity to the TU Dublin Campus and Dublin City. In comparison, the proposed development is 643 bedspaces per hectare, has a site coverage of 52.5% and a plot ratio of 1:2 which is lower than established precedent.

The Sunlight and Daylight Access Report prepared by ARC, which accompanies this planning application, concludes that the impact of the proposed development is within accepted standards as set out in the relevant Guidelines.

We do not consider the proposed development represents overdevelopment, but rather an appropriately designed compact development in a highly sustainable location, where:

- i. the relationships with the adjoining properties have been carefully considered to prevent any overbearance or overshadowing. The higher buildings (5 storeys) are focused to the centre of the site, away from the site boundaries;
- ii. the proposed street edge along Prussia Street will be enhanced and animated by a cafe; and,
- iii. generous and securely overlooked areas of public and communal open space are proposed.

Notwithstanding this, an assessment against the performance-based criteria set out in Volume 2, Appendix 3 of the Development Plan for higher density development is included in the table below:

Objective	Performance Based Criteria	Compliance
<p>To promote development with a sense of place and character</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ 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,</li> <li>▪ have a positive impact on the local community and environment and contribute to 'healthy placemaking',</li> <li>▪ create a distinctive design and add to and enhance the quality design of the area,</li> <li>▪ be appropriately located in highly accessible places of greater activity and land use intensity,</li> <li>▪ 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,</li> <li>▪ not be monolithic and should have a well-considered design response that avoids long slab blocks,</li> <li>▪ ensure that set back floors are appropriately scaled and designed.</li> </ul>	<p>The proposed development has been designed to integrate with the existing urban grain of this part of Dublin 7 which has been subject to significant change over the last 100 or so years. The proposed development, which varies in height from 3 to 5 storeys, sits comfortably within the wider area as highlighted in the Design Statement prepared by OMP Architects and Photomontages prepared by Modelworks. The proposed building heights have been carefully considered to mitigate against impact on the adjoining residential properties, and the use of red brick on the elevation addressing Prussia Street further integrates the proposed development with the existing streetscape.</p> <p>The redevelopment of this brownfield site will have a positive impact on the environment and contribute to healthy placemaking by making use of a vacant and underutilised site, and the proposed development of a café will add vibrancy and an active street frontage.</p> <p>In terms of accessibility, the site is within walking distance of the Technological University Dublin (TU) Grangegorman Campus, cycling distance of Trinity College and within walking distance of Phibsborough Luas stop. In addition, a number of bus routes also serve the site from existing bus stops on Prussia Street.</p>
<p>To provide appropriate legibility</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ make a positive contribution to legibility in an area in a cohesive manner,</li> <li>▪ reflect and reinforce the role and function of streets and places and enhance</li> </ul>	<p>The proposed development will provide for active street frontage at this location which will contribute to the legibility of the street by continuing the building line along the edge of the street which is currently a gateway and hidden by</p>



	<p>permeability.</p>	<p>existing buildings. The proposed modulated massing and detailing responds to the local context, proposing an active ground floor, a coherent shoulder height and legible, identifiable taller elements that create a distinctive roofline.</p> <p>The development, due to its nature, will reinforce the function of Prussia Street as an urban village by increasing the population at this location while providing much needed student accommodation in close proximity to the TU Dublin Grangegorman Campus and Dublin City Centre.</p>
<p>To provide appropriate continuity and enclosure of streets and spaces</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ enhance the urban design context for public spaces and key thoroughfares,</li> <li>▪ provide appropriate level of enclosure to streets and spaces,</li> <li>▪ not produce canyons of excessive scale and overbearing of streets and spaces,</li> <li>▪ generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,</li> <li>▪ provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.</li> </ul>	<p>Close attention has been paid by the project architects to the existing boundary conditions of the site. The proposed massing and internal layouts have been developed to protect the amenity of the existing adjoining properties and provides a distinctive elevation on Prussia Street in keeping with the surrounding area.</p> <p>The scheme's frontage, ground floor amenities and architectural quality will positively contribute to the Prussia Street streetscape. It is considered that the completion of this building will make a positive contribution to the streetscape and identity of the area while positively adding to the mix of tenures available in the area.</p> <p>External communal open space is provided in the form of a series of gardens and an entrance plaza and are well overlooked by bedroom and living room/ communal space windows therefore providing adequate passive surveillance.</p>
<p>To provide well connected, high quality and active public and communal spaces</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport,</li> <li>▪ be appropriately scaled and distanced to</li> </ul>	<p>The proposed development is already in a location well served by public transport including the LUAS and Dublin Bus as well as being within walking and cycling distance of Dublin City.</p> <p>As previously outlined, the proposed</p>

	<p>provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards,</p> <ul style="list-style-type: none"> <li>▪ 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,</li> <li>▪ 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,</li> <li>▪ ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated,</li> <li>▪ provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.</li> </ul>	<p>external communal open space are well overlooked by bedroom and living room/ communal space windows therefore providing adequate possible surveillance.</p> <p>A Sunlight and Daylight Access report has been prepared by ARC confirming that the proposed development meets all the relevant standards with regard to Sunlight and Daylight and will not adversely impact any surrounding residential properties in terms of loss of light.</p> <p>The proposed development has been designed to meet Part M of the Building Regulations and proposes level access from Prussia Street into the proposed development.</p>
<p>To provide high quality, attractive and useable private spaces</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ not compromise the provision of high quality private outdoor space,</li> <li>▪ ensure that private space is usable, safe, accessible and inviting,</li> <li>▪ ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16,</li> <li>▪ assess the microclimatic effects to mitigate and avoid negative impacts,</li> <li>▪ retain reasonable levels of overlooking and privacy in residential and mixed use development.</li> </ul>	<p>The layout and design have taken into account security and passive surveillance. The proposed café and student accommodation above will provide a high level of passive surveillance over the scheme’s frontage on Prussia Street and the communal open spaces.</p> <p>The internal layouts of the apartments offer direct frontage onto all public and private spaces creating a safe, secure, and enjoyable development. The landscape design of the courtyard gardens will balance privacy and high quality planting and materials.</p> <p>A Sunlight and Daylight Access report has been prepared by ARC confirming that the proposed development meets all the relevant standards with regard to Sunlight and Daylight and will not adversely impact any surrounding residential properties in terms of loss of light.</p>

<p>To promote mix of use and diversity of activities</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure,</li> <li>▪ contribute positively to the formation of a 'sustainable urban neighbourhood',</li> <li>▪ include a mix of building and dwelling typologies in the neighbourhood,</li> <li>▪ provide for residential development, with a range of housing typologies suited to different stages of the life cycle.</li> </ul>	<p>The proposed development includes a mix of uses including a café and a student accommodation scheme which will provide additional employment and accommodation in this highly accessible location.</p> <p>Through the re-development of the site for use as student accommodation, the unit mix and tenure of available accommodation in this area to serve both students and those seeking private accommodation will be diversified. This will therefore provide accommodation to suit the needs of those at many different stages of their lives.</p>
<p>To ensure high quality and environmentally sustainable buildings</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, noise and views to minimise overshadowing and loss of light – see Appendix 16,</li> <li>▪ not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain,</li> <li>▪ ensure a degree of physical building adaptability as well as internal flexibility in design and layout,</li> <li>▪ ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive,</li> <li>▪ maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage,</li> <li>▪ be constructed of the highest quality materials and robust construction methodologies,</li> <li>▪ incorporate appropriate sustainable technologies, be energy efficient and climate resilient,</li> <li>▪ apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances</li> </ul>	<p>As outlined in the Sunlight and Daylight Access report, the proposed development meets all the relevant standards with regard to Sunlight and Daylight and will not adversely impact any surrounding residential properties in terms of loss of light.</p> <p>Based on the current design of the proposed development, it is considered that the development could be later converted into private housing should the demand for student accommodation at this location decrease to the point where the scheme was no longer viable. The apartment blocks could be amalgamated and converted into more traditional apartment units, and the development could be managed by a management company who would maintain the building on behalf of the occupants.</p> <p>No plant is proposed at roof level of the proposed apartment blocks so there will be no visual impact in terms of development at roof level which could detract from the high-quality design of the proposed development.</p> <p>Horgan Lynch Consulting Engineers have prepared a Surface Water Management Strategy including a Green/ Blue Roof Strategy and an Engineering Services Report which</p>

	<p>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,</p> <ul style="list-style-type: none"> <li>▪ incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place,</li> <li>▪ include a flood risk assessment.</li> <li>▪ include an assessment of embodied energy impacts.</li> </ul>	<p>gives a full breakdown of the approach to surface water management/SuDS for the site.</p> <p>A Climate Action and Energy Statement has been prepared by DKP Partnership which sets out compliance with Part L building regulations which form part of Ireland's commitment to improving standards of energy performance and carbon emissions for new buildings.</p> <p>A Building Lifecycle Report prepared by Aramark assesses the embodied energy impact of the proposed development.</p>
<p>To secure sustainable density, intensity at locations of high accessibility</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ 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,</li> <li>▪ look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.</li> </ul>	<p>The proposed development is already in a location well served by public transport including the LUAS and Dublin Bus as well as being within walking and cycling distance of Dublin City.</p> <p>The proposed development has been designed to make the most efficient use of the site while still providing all required services including cycle parking, communal open space, student amenities and meeting the unit size requirements for purpose-built student accommodation.</p>
<p>To protect historic environments from insensitive development</p>	<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed,</li> <li>▪ assess potential impacts on key views and vistas related to the historic environment.</li> </ul>	<p>The submitted photomontages prepared by Modelworks confirms that the proposed development will not have an adverse impact on the character and setting of the Prussia Street Red-Line Conservation Area. A Townscape and Visual Impact Assessment accompanies this application which concludes:</p> <p><i>“considering the varying impacts on the different receptors in the receiving environment, the assessment has found that the net townscape effects of the proposed development would be of moderate significance (EPA definition: “An effect that alters the character of the environment</i></p>

		<p><i>in a manner that is consistent with existing and emerging baseline trends") and positive."</i></p> <p>An Architectural Heritage Impact Assessment prepared by ARC also accompanies this application which confirms that the proposed development is in keeping with the pattern of development within the Prussia Street Conservation Area and will have a moderate impact on the heritage of the wider area.</p>
<p>To ensure appropriate management and maintenance</p>	<p>Enhanced density and scale should</p> <ul style="list-style-type: none"> <li>▪ Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.</li> </ul>	<p>An Operational Student Management Plan including details on the management and use of the facility during term and outside of term in addition to the management of the amenity spaces both during term and outside of term times prepared by HW Planning is enclosed.</p>

**Table 4.4. Assessment of Scheme Against Density Performance based Criteria**

**Height**

As outlined in the Development Plan, in general, and in accordance with the Guidelines, developments of 6 storeys are promoted in the city centre and within the canal ring subject to site specific characteristics. The proposed development has been designed to integrate with its surrounding context and is comprised of 2 no. apartment buildings ranging in height from 3 to 5 storeys. Having regard to the specific characteristics of the site a single storey terrace of own door studio units are proposed. The proposed building heights are considered acceptable in this location given the site’s existing and emerging context, local and national policy.

**4.1.3 Daylight/Sunlight and Overshadowing**

A Sunlight and Daylight Access Analysis Report has been prepared by ARC Architectural Consultants which assesses the Daylight and Sunlight of the proposed development and properties located in the surrounding area.

As the Council will note that BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’ was withdrawn in May 2019 and was replaced with BS EN 17037: Daylight in Buildings in May 2019. In June 2022, the second edition of the Building Research Establishment’s Site Layout Planning for Daylight and Sunlight (2011) was replaced with a third edition, which references recommendations in BS EN 17037. Nonetheless, and as the British standard and BRE Guidance are specifically noted in the 2018 Urban Development and Building Height Guidelines for Planning Authorities, appropriate and reasonable regard has also been had in relation to this guidance as part of a full and thorough assessment approach.

As a general point, we note the statement on Page 4 of BRE 209 2022 Edition - Site layout planning for daylight and sunlight which states that:

*'This report is a comprehensive revision of the 2011 edition of Site layout planning for daylight and sunlight: a guide to good practice. It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location. Appendix F explains how this can be done in a logical way, while retaining consistency with the British Standard recommendations on interior daylighting'.*

Section 1.6 and 1.7 of the Guide highlights that:

*'1.6 The guide is intended for building designers and their clients, consultants, and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design (see Section 5). In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings. Alternatively, where natural light is of special importance, less obstruction and hence more sunlight and daylight may be deemed necessary. The calculation methods in Appendices A and B are entirely flexible in this respect. Appendix F gives advice on how to develop a consistent set of target values for skylight under such circumstances.*

*1.7 The guidance here is intended for use in the United Kingdom and in the Republic of Ireland, though recommendations in the Irish Standard IS EN 17037 may vary from those in BS EN 17037. Many of the principles outlined will apply to other temperate climates. More specific guidance for other locations and climate types is given in BRE Report Environmental site layout planning'.*

The Council may also be aware of a third standard, IS EN 17037: Daylight in Buildings was published by the National Standards Authority of Ireland (NSAI) on 28th January 2019. This sets out different methodologies for assessment of daylight access within buildings, as well as different minimum standards. To date this standard has not been applied rigidly by local authorities on the basis of unsuitability, which is acknowledged in Appendix 16 (Section 3.4) of the Dublin City Development Plan 2022-2028 which states:

*'Prior to 2018, Ireland had no standard for daylight. In 2018, the National Standards Authority of Ireland adopted EN 17037 to directly become IS EN 17037. It is important to note that no amendments were made to this document and unlike BS EN 317037, it does not contain a national annex. It offers only a single target for new buildings (there are no space by space targets – e.g. a kitchen would have the same target as a warehouse or office). It does not offer guidance on how new developments will impact on surrounding existing environments. These limitations make it unsuitable for use in planning policy or during planning applications. BR 209 must still be used for this purpose'.*

Notwithstanding this, this guide has also been applied to the assessment by ARC for completeness.

The Sunlight and Daylight Access Analysis Report submitted confirms that the proposed development as designed, generally meets the BRE Guidelines in terms of Daylight/Sunlight, and

that the proposed development will not have a detrimental impact on existing properties in terms of daylight/sunlight or overshadowing.

#### 4.1.4 Architectural Conservation Area

While the majority of the site is not located in the Prussia Street Architectural Conservation Area, the design of the proposed development has been designed to respect the character of the surrounding area. An Architectural Heritage Impact Assessment Report prepared by ARC accompanies the pre-consultation request which outlines the history of the site and surrounding area and concludes:

*“The Prussia Street area, which closely neighbours the Grangegorman TU Dublin Campus, continues to undergo very major change as a result of considerable new construction and envisaged permitted developments. While the southern end of Prussia Street is typified by two and three storey terraces, the northern section of Prussia Street (on which the application site is located) is characterised by a more diverse mix of building types in terms of building height, grain and scale. In the context of taller and larger scale buildings such as the four storey modern building at Nos. 64-65, the large and tall Georgian houses at Nos. 29 and 55, and the permitted three to five storey street frontage at the Park Shopping Centre site, the proposed four to five storey Prussia Street frontage is likely to appear in keeping with the pattern of development in the Conservation Area on the northern section of Prussia Street. Given this, the potential indirect impact of the construction of the proposed development on the architectural heritage of Prussia Street, a Conservation Area, is assessed as “moderate” under a worst case scenario”.*

The approach to the design of the proposed development is consistent with the spirit of the Development Plan where it is outlined that Architectural Conservation Area designations are there to protect and enhance the special character of an area, but not preclude any appropriate forms of new development.

Furthermore, a Townscape and Visual impact Assessment prepared by Modelworks is enclosed which assesses the impact of the proposed development on the receiving environment. This report assesses the impact of the proposed development in terms of the change to the wider townscape as well as within the immediate area surrounding the site. This report concludes:

*“In conclusion, considering the varying impacts on the different receptors in the receiving environment, the assessment has found that the net townscape effects of the proposed development would be of moderate significance (EPA definition: “An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends”) and positive.”*

The design of the proposed development reflects a similar architectural response to permitted developments in the area in both bulk, scale and massing as well as materiality. This part of Prussia Street is currently in transition, and the proposed development will visually enhance this part of Prussia Street once constructed.

See enclosed Architectural Design Statement prepared by O'Mahony Pike Architects provides further justification for the design approach.

#### 4.1.5 Communal Indoor/Outdoor Space

In accordance with Council standards, communal facilities and services which serve the needs of students have been provided both internally and externally within the proposed development in the form of external garden areas, plaza, and internal student amenity space (2,035.8 sq.m). A total of 587.4 sq.m of indoor amenity space has also been provided. The internal amenity space is comprised of uses such as student lounges, study room, gym, cinema, games room and laundry room and is located within the basement and ground floor of the scheme.

Table 15-18 of the Dublin City Development Plan sets out standards regarding the communal area required to serve student accommodation:

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

Figure 4.4. Extract from Table 15-8 Setting Out Communal Amenity Standards for PBSA

A total of 5.5 sq.m of indoor and outdoor communal amenity space per bedspace has been provided, which is compliant with the standards set out in the Dublin City Development Plan. Each room has been designed to include a kitchen/living/dining space which is in excess of the standards set out in the Development Plan.

#### 4.1.6 Car and Cycle Parking

Chapter 5 sets out the standards for car and cycle parking for student accommodation where the following is stated:

*“Designated car parking will not be supported in student accommodation schemes in the city. However, car parking for persons with disabilities should be provided. 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.”*

The City Development Plan states that 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. The proposed development provides a total of 373 no. cycle parking spaces (1 space per bedspace) with a further 75 no. space to serve visitors. A further 4 no. cycle parking spaces have been allocated to serve staff members of the proposed café, which is compliant with Development Plan standards.



Category	Land-Use	Zone	Long Term	Short Stay/Visitor
Accommodation	Hotel <sup>1</sup>	All Zones	1 per 5 staff	To be determined by the planning authority on case by case basis
	Nursing Home Elderly Persons Accommodation/ Sheltered Housing <sup>2</sup>	All Zones	1 per 5 staff 1 per 5 residents	1 per 10 residents
	Residential Apartment <sup>3</sup>	All Zones	1 per bedroom	1 per two apartments
	Residential Dwelling	All Zones	1 per unit	1 per 5 dwellings
	Student Accommodation	All Zones	1 per bedroom	1 per 5 bedrooms
Retail and Retail Service	Café Restaurant	All Zones	1 per 5 staff	1 per 10 seats
	Public Houses	All Zones	1 per 5 staff	1 per 150 sq. m. GFA
	Retail	All Zones	1 per 5 staff	1 per 100 sq. m. GFA
	Retail Warehousing	All Zones	1 per 5 staff	1 per 100 sq. m. GFA

Figure 4.5. Extract from Volume 2, Appendix 5, Table 1 Setting Out Bicycle Parking Standards

As no designated car parking will be supported by the Council to serve student accommodation, no car parking spaces are proposed.

Category	Land-Use	Zone 1	Zone 2	Zone 3
Accommodation	Hotel <sup>1</sup>	None	1 per 3 rooms	1 per room
	Nursing Home Retirement Home	1 per 3 residents	1 per 2 residents	1 per 2 residents
	Elderly Persons Housing Sheltered Housing	1 per 4 dwellings	1 per 2 dwellings	1 per 2 dwellings
	Student Accommodation	None <sup>2</sup>	1 per 20 bed spaces	1 per 10 bed spaces
	Houses Apartments/ Duplexes	0.5 per dwelling	1 per dwelling	1 per dwelling

Figure 4.6. Extract from Volume 2, Appendix 5, Table 2 Setting Out Maximum Car Parking Standards

# Conclusion

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The proposed development site is located in an area zoned 'Z4 – Key Urban Villages/ Urban Villages' where Student Accommodation is a use which is open to consideration. The site is considered an accessible location by where students can easily travel to a number of third level institutes including TU Dublin, Trinity College, Griffith College, and the Royal College of Surgeons in Ireland by waling, cycling via public transport which is in accordance with the planning policies and objectives as included in the Dublin City Development Plan.

The proposed development will provide Purpose-Built Student Accommodation the need for which continues to rise and given the sites proximity to several third level institutions and its accessibility level, it is considered that the proposed development is an acceptable use at this location. The proposed development will not result in an overconcentration of student accommodation within this area and the mix of units, including the proportion of studios is proposed to meet an identified and quantified need for this type of unit.

The proposed development site is a typical brownfield site, and local and national policies encourage its redevelopment to higher densities. The proposed development sits comfortably within local and national policy density criteria and displays none of the symptoms of overdevelopment, which would suggest that the scale and density of the development is appropriate. However, we note that compliance with these standards alone do not dictate a good quality living environment for future residents and a lack of impact on the existing environment. The enclosed document prepared by O'Mahony Pike Architects demonstrates that a high-quality living environment will be achieved, and the daylight/sunlight & overshadowing analysis highlights that impacts are within acceptable levels given the site's urban context.

Overall we consider that the proposed development represents the appropriate redevelopment of this brownfield site at a scale and density that is required to achieve compact growth, and which can be achieved without injury to existing amenities and in an manner which respect the character of this area.



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ISO 14001:2015  
ISO 45001:2018