



Response to LRD Opinion

**Proposed Large-Scale Residential Development for Student
Accommodation at Prussia Street, Dublin 7.**

Lyonshall Limited

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Introduction

This report has been prepared in accordance with Section 32(D) of the Planning and Development Act, 2000 (as amended), and provides a response to the opinion issued by Dublin City Council on the 24th of January 2024 (Ref. No: LRD6050/23-S2). Following the LRD Meeting held on 18th of December 2023 via Microsoft Teams, the Council issued their opinion dated 24th of January 2024 which indicated that the documents submitted with the request to enter into consultations required further consideration and amendment to constitute a reasonable basis for an application for permission for the proposed LRD.

1.1 Site Context

Prussia Street is located in Stoneybatter which is a vibrant neighbourhood on the north side of Dublin City. The site is currently vacant and underutilised and is in close proximity to the Grangegorman TU Dublin Campus as well as Dublin City Centre. The site was previously used as an IDA (Industrial Development Agency) Centre whose aim was to support and develop businesses and enterprises in this area of Dublin 7. As a result, a number of businesses were housed within the existing structures on the site for many years. 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 north¹.

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

¹ Former City Arms Hotel.



Figure 1.1 – Aerial View of the Site and Surrounding Context

The site is within walking distance of the Technological University Dublin (TU Dublin) Grangegorman Campus (5-minute walk) and within cycling distance of Trinity College (11-minute cycle). The Phibsborough Luas stop is located a 12-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 Dunbooyne, making the site a highly accessible location.

Summary of Response to Council Opinion

In its opinion the Council highlighted that further consideration was required with regard to various matters, and also outlined that specific reports were required by them in order to fully assess the proposed development. These have been responded to in detail in Section 3 of this report and in the order in which they appear in the Council's Opinion. Due to the number and complexity of Opinion items, the table overleaf provides a summary and highlights where within the submitted application documentation each item has been responded to.

Item No.	Relevant Document/Consultant
1 - Planning	
1(a) Schedule of Accommodation	Schedule of Accommodation prepared by O'Mahony Pike Architects.
1(b) Compliance with Section 14.6 of the CDP	The response is provided in Section 3 as well as Planning Statement prepared by HW Planning.
1(c) Studio Unit Justification	The response is provided in Section 3 as well as Planning Statement prepared by HW Planning.
1(d) Student Accommodation Justification	The response is provided in Section 3 as well as Planning Statement prepared by HW Planning.
1(e) Compliance with Policy CUO25 of the CDP	The response is provided in Section 3 as well as Planning Statement prepared by HW Planning.
1(f) Changes to Brick and fenestration	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
1(g) Building Materials	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
1(h) Updated Daylight and Sunlight Assessment	The response is provided in the Sunlight and Daylight Analysis Report prepared by ARC Consultants
1(i) Compliance with Section 15.13.1.3 of the CDP	The response is provided in Section 3 as well as Planning Statement prepared by HW Planning.
1(j) Updated Cross Sections and Elevations	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
1(k) Residential Amenity and Visual Impact	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects and Photomontages and Townscape and Visual Impact Assessment prepared by Modelworks.
1(l) AA Screening	The response is provided in the AA Screening Report prepared by Altemar Marine and Environmental Consultancy.
1(m) Nesting Bird Survey	The response is provided in Section 3 as well as EcIA prepared by Altemar Marine and Environmental Consultancy.
1(n) EIAR Screening	The response is provided in the enclosed EIAR Screening Report prepared by HW Planning.

1(o) Required Documents as per Table 15-1 of CDP	The response is provided in Section 3.
2 - Conservation	
2(a) Demolition Drawings to Outline Buildings in Red	The response is provided in the Architectural Drawings prepared by O'Mahony Pike Architects.
2(b) Re-Design of Front facade	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
2(c) Set-Back of proposed Development	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
2(d) Impact on NIAH Listed Buildings	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
2(e) Building Height	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects and Planning Statement and Statement of Consistency prepared by HW Planning.
2(f) Architectural Heritage Impact Assessment to include details on site context.	The response is provided in the Architectural Heritage Impact Assessment prepared by ARC Consultants.
2(g) Architectural Heritage Impact Assessment to include assessment of impact of proposed development on Prussia Street.	The response is provided in the Architectural Heritage Impact Assessment prepared by ARC Consultants.
3 - Transportation	
3(1) (a) Revision of outdoor seating.	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
3 (1) (b) Revision to internal footpaths.	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects and DMURS Compliance Statement prepared by MHL Consulting Engineers.
3 (2) (a) Student drop-off management.	The response is provided in the Mobility Management Plan prepared by MHL Consulting Engineers.

3 (2) (b) Bike store security.	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
3 (2) (c) Inclusion of staff cycle parking area.	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
3 (2) (d) Provision of adaptive cycle parking spaces/EV Charging Facilities.	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
3 (2) (e) Detailed Bicycle Store drawings.	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
3 (2) (f) Bicycle Parking.	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
3 (3) (a) Response to Road Safety Audit	The response is provided in Section 3 as well as Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects.
3 (3) (b) Scaled Auto-Track drawings.	The response is provided in the Auto-Track Drawings prepared by MHL Consulting Engineers.
3 (3) (c) Commercial bin storage.	The response is provided in the Architectural Drawings and Design Statement prepared by O'Mahony Pike Architects and Operational Waste Management Plan prepared by AWN Consultants.
3 (3) (d) Bin management.	The response is provided in the Operational Waste Management Plan prepared by AWN Consultants.
3 (4)(a) BusConnects	The response is provided in the BusConnects Overlay Drawing prepared by MHL Consulting Engineers.
4 - Drainage	
4 (a) Updated Basement Impact Assessment.	The response is provided in the Basement Impact Assessment prepared by Horgan Lynch Consulting Engineers.
4 (b) Site Specific Flood Risk Assessment.	The response is provided in the Site-Specific Flood Risk Assessment prepared by JBA Consulting Engineers.
4 (c) Blue Roofs.	The response is provided in the Engineering Drawings prepared by Horgan Lynch Consulting Engineers.
4 (d) Green/ Blue Roof alignment.	The response is provided in the Engineering Drawings prepared by Horgan Lynch Consulting Engineers.

4 (e) Storm Water Management	The response is provided in the Surface Water Management Report prepared by Horgan Lynch Consulting Engineers.
4 (f) Drainage layout details.	The response is provided in the Engineering Drawings prepared by Horgan Lynch Consulting Engineers.
4 (g) Infiltration rates.	The response is provided in the Engineering Report prepared by Horgan Lynch Consulting Engineers.
4 (h) SuDS details.	The response is provided in the Engineering Report and Drawings prepared by Horgan Lynch Consulting Engineers.
5 – Parks, Biodiversity and Landscape	
5 (a) Daylight/Sunlight compensatory measures.	No compensatory measures were required as the development is fully compliant with the Daylight/Sunlight Guidelines.
5 (b) Use of natural stone.	The response is provided in Section 3 as well as Landscape Drawings Drawings and Landscape Design Statement prepared by Doyle O'Troithigh Landscape Architects.
5 (c) External seating.	The response is provided in Section 3 as well as Landscape Drawings and Landscape Design Statement prepared by Doyle O'Troithigh Landscape Architects.
5 (d) Covered bicycle stands.	As requested, the proposed development provides for 50% covered bicycle stands.
5 (e) Schedule of materials.	The response is provided in Section 3 as well as Landscape Drawings and Landscape Design Statement prepared by Doyle O'Troithigh Landscape Architects.
5 (f) Building section with T7 tree.	The response is provided in Section 3 as well as Landscape Design Statement prepared by Doyle O'Troithigh Landscape Architects.
5 (g) Tree protection plan.	A Tree Protection Plan has been prepared by Charles McCorkell Arboricultural Consultancy which is submitted with this planning application
5 (h) Tree bond.	No action required.
5 (i) Heat Map.	The response is provided in the Sunlight and Daylight Impact Analysis Report prepared by ARC Consultants.
5 (j) AA Screening, EclA and Biodiversity Enhancement Plan.	The response is provided in Section 3, AA Screening Report and EclA prepared by Altemar Marine and Environmental Consultants and Landscape Design Statement prepared by Doyle O'Troithigh Landscape Architects.

5 (k) Landscape Masterplan.	The response is provided in the Landscape Design Statement prepared by Doyle O'Troithigh Landscape Architects.
5 (l) Green Roof Plan.	The response is provided in the Landscape Drawings prepared by Doyle O'Troithigh Landscape Architects.
6 – Any Other Business	
6 (a) Archaeological Assessment.	The response is provided in the Archaeological Assessment prepared by John Cronin and Associates.
6 (b) Demolition Justification Report.	The response is provided in Section 3 and Appendix 1 of the Climate Action and Energy Statement prepared by DKP Partnership.
6 (c) Climate Action Energy Statement.	The response is provided in the Climate Action and Energy Statement prepared by DKP Partnership.

Detailed Response to LRD Opinion

This section of the report outlines in detail the applicants' responses to the matters raised in the Dublin City Council LRD Pre-Application Consultation Opinion (LRD6050/23-S2), received on 24th of January 2024. The Council considered that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for a large-scale residential development.

3.1 Planning Issues

1(a) A detailed schedule of accommodation which shall indicate compliance with all relevant standards in the Dublin City Development Plan 2022-2028.

A Schedule of Accommodation had been prepared by O' Mahony Pike Architect setting out the proposed developments compliance with all relevant standards including the Development Plan and Guidelines on Residential Development for 3rd Level Students (1999).

1(b) The applicant should demonstrate that the proposed development would not have an undue impact on the amenities of surrounding properties having regard to Section 14.6 Transitional Zone Areas of the Dublin City Development Plan 2022-2028.

The Dublin City Development Plan states in Section 14.6 that:

"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 (The response is provided in the 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 in the context of the proposed development, as highlighted in Section 4 of the Planning Statement and further discussed in the Design Statement prepared by O'Mahony Pike Architects.

1(c) The application should include a robust, demand-led rationale for the number of studio units proposed within the development.

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. 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.

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 type 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.330 studio beds currently in operation, 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.

The response is provided in the enclosed Planning Statement prepared by HW Planning for further justification on the unit mix of the proposed development.

1(d) The application should include a robust, detailed justification and rationale for Student Accommodation in this area having particular regard to the number of student accommodation developments within the area.

A 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.

Regarding the justification for a PBSA at this location, we would like to highlight to the Council 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 students per bed). As of the time of writing this report, this stock is already at 75% occupancy for academic year 2024/2025, considerably ahead of where it is in similarly sized UK University cities. Therefore, confirming that there is a demand for additional student accommodation at this location.

1(e) The applicant should justify why the provisions of Policy CU025 of the Dublin City Development Plan 2022-2028 would not apply to the proposed development.

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 and is noted in the LRD Planners Report.

1(f) The Planning Authority is of the opinion that the proposed development in its current form is overly bulky. The Planning Authority noted that the scale could be reduced by design e.g. different brick colour or fenestration. Revised drawings, updated Architectural Design Report, with text referring to the revised design, and revised photomontages, are required.

The comments and suggestions of the Planning Authority are noted and in response 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.

1(g) Drawings should demonstrate that the scheme maximises more durable materials (such as brick) and that rendering is minimised.

Brick is the main building material used for the proposed development. This will ensure that there is minimal maintenance, while also ensuring that it is sympathetic to its surroundings which are mainly comprised of brick buildings. The justification for the proposed materials is provided in the submitted Design Statement prepared by O'Mahony Pike Architects.

1(h) An updated and detailed daylight and sunlight assessment of the proposed development as per discussions in the LRD meeting, in accordance with the relevant Guidelines, which will demonstrate an acceptable level of day light and sunlight for the proposed occupants of the development, the communal open space for residents and existing neighbouring properties is required.

An updated Sunlight/Daylight Analysis Report has been prepared by ARC Consultants which confirms that the proposed development is in full compliance with the relevant Daylight/Sunlight Assessment Guidelines.

1(i) The applicant shall ensure that all communal facilities comply with Section 15.13.1.3 of the Dublin City Development Plan 2022-2028.

All communal facilities within the proposed development comply with Section 15.13.1.3 of the Dublin City Development Plan. A total of 2,035.8 sq.m of internal and external community spaces have been provided to serve the future occupants of the scheme, by where 5.5 sq.m of communal facilities is provided per bedspace.

1(j) The applicant should include updated cross sections and elevations which show line of sight from the upper floors of the north and south facing buildings to demonstrate that the proposal would not lead to undue overlooking of surrounding properties.

Updated sections and elevations have been prepared by O'Mahony Pike Architects and are provided in the accompanying Architectural Drawings.

1(k) Demonstration (by way of revised Visual Impact Assessment, photomontages, shadow analysis, etc) that neighbouring residential amenity and the visual amenity of the area is not unduly affected.

A Townscape and Visual impact Assessment and Photomontages prepared by Modelworks accompanies the application. 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."

Overall, it is considered that the proposed development will integrate well into its surrounding context.

1(l) A full, detailed and robust screening documents for Appropriate Assessment is required.

An Appropriate Assessment Screening Report has been prepared by Altemar which concludes that the proposed development would not trigger a requirement for a Stage 2 Appropriate Assessment.

1(m) A full nesting bird survey is required.

As highlighted in the Ecological Impact Assessment prepared by Altemar, there is no evidence of breeding birds of conservation importance e.g. swallow nests noted on site during the field study, therefore it was not considered necessary to prepare a full nesting bird survey to accompany this planning application. The applicants have no objection to the imposition of a condition requiring a bird survey be carried out prior to the demolition of the buildings and for the findings and any potential mitigation measures to be agreed with the Planning Authority.

1(n) A full, detailed and robust screening documents for Environmental Impact Assessment is required.

An Environmental Impact Assessment has been prepared by HW Planning which concludes that the proposed development would not trigger a requirement for an Environmental Impact Assessment.

1(o) The applicants should satisfy themselves that they have submitted all required material as set out in Table 15-1 of the Development Plan (not reiterated here) for a development of this size and nature.

The applicant in conjunction with the Design Team have reviewed this table and are satisfied that all documents required as per Table 15-1 of the Development Plan have been provided with this application.

3.2 Conservation Issues

2(a) All drawings should be appropriately labelled. All demolition to be shown in red – not green or blue.

In accordance with the Planning Authority's request all submitted drawings prepared by O'Mahony Pike Architects have been appropriately labelled. As requested all demolition drawings now illustrate the buildings to be demolished hatched in red.

2(b) The front façade of the new building along Prussia Street should be re-designed to be more in keeping with the character of the area and should be closer to that proposed in the first pre-planning meeting.

In response to this request, the design team have reverted to the original design for the building facing addressing Prussia Street. The justification and rationale for the proposed Prussia Street façade is outlined in detail Chapter 3 of Design Statement prepared by O'Mahony Pike Architects.

2(c) The setback of the new proposal from Prussia Street still remains visible the skyline. A set-back may not be the most appropriate solution as it does not have the effect of receding the proposal into the background. The applicant shall consider this.

The comments of the Planning Authority are noted and the applicant have reconsidered but on reflection it is considered that the set-back proposed off Prussia Street is appropriate at this location. The set-back as proposed mirrors the development to the south of the site therefore ensuring that the development sits well within the existing streetscape. The metal cladding's strong tonal contrast with the proposed red brick of the main elevation will help distinguish them visually, highlighting the different nature of the set-back level.

2(d) The applicant shall give further consideration to the impact of the proximity and height of the proposed development on the setting of the NIAH structures in proximity to the proposed development.

2(e) The height of the new development should relate more sympathetically with the parapet heights of the immediately adjoining NIAH structures so that it sits more comfortably within its context.

The comments of the Planning Authority are noted, but the applicants consider that the proposed development responds to its local context by maintaining respectful set-backs and employing appropriate material and architectural vocabulary, while delivering a density appropriate to its central location. Its form and massing will reinforce the local fabric and integrate into the changing, dynamic streetscape of Prussia Street, its elevations and roofscape appearing and disappearing from view as one travels along Prussia

Street which is considered appropriate. The accompanying Architectural Design Statement provides further justification on the height and massing of the proposed development.

In relation to the impact on No's 56 and 57 Prussia Street, the proposed entrance laneway offers breathing space in the street elevation and ensures the proposed development does not read as being overbearing to the existing houses. The design of the proposed development allows views into the proposed gardens within the development from Prussia Street which mitigates the height difference between the existing houses and the proposed building as highlighted in Figure 01 below.



Proposed Prussia Street Elevation with 6m Laneway Between Block 1 and no. 56 Prussia Street

In addition, the Architectural Heritage Impact Assessment 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. The response is provided in the enclosed Architectural Heritage Impact Assessment prepared by ARC Consultants.

2(f) The Architectural Heritage Impact Assessment should be augmented to provide a more detailed analysis of the surrounding context. Photographs and documentation of the NIAH structures, Protected Structures / Church and the receiving historic environment should be provided.

2(g) The Architectural Heritage Impact Assessment should include an appraisal of the surrounding context and an impartial assessment of the impact of the proposal on that receiving environment.

The Architectural Heritage Impact Assessment prepared by ARC Consultants has been updated to provide a detailed analysis of the surrounding context and the impact of the proposed development on its receiving environment as requested.

3.3 Transportation Issues

3(1) Site access, internal permeability and outdoor seating area requires review:

- a) The applicant should revisit the proposed outdoor seating area in terms of safety, which currently is located near a shared area where only vehicular site access is also proposed, creating an unsafe zone for all users due to the encroachment of manoeuvres by vehicles. Consideration should be given regarding security measures at this location, i.e. bollards. The applicant should clarify how the potential for overspilling street furniture at this location can be avoided.*

Due to the safety concerns raised in the LRD Pre-Consultation meeting, the outdoor seating to serve the proposed Café has now been removed. This will ensure that there will be no conflicts between pedestrians/refuse vehicles at this location.

- b) Internal footpaths should be designed for all users, specifically users with limited mobility. In that regard, the applicant should revisit internal footpath widths in order to avoid pinch points (i.e. footpaths less than 1.8m wide as per DMURS).*

All footpaths have been reviewed and have been designed to be DMURS compliant. This is confirmed in the DMURS Compliance Statement prepared by MHL Consulting Engineers.

3(2) Car & Bicycle Parking provision requires review:

- a) The applicant should ensure consistency through the documentation, including the MMP and TP, regarding the lack of provision for a drop-off area. If access to the site for drop-off is intended, this should be clearly described in the submitted documentation, including details of management of the same.*

In response to this point, we wish to confirm to Dublin City Council that no set-down areas have been provided within the proposed development as it was highlighted by the Traffic Engineers that this could lead to traffic/pedestrian conflict within the site. As a result, the Travel Plan and Mobility Management Plan prepared by MHL Consulting Engineers have been updated to reflect this change.

- b) Where large bicycle stores are proposed, consideration should be given regarding the provision of additional security measures within these stores, e.g., the provision of bicycle cages that hold a smaller number of bicycles, specifically where shared access is to be proposed for more than one purpose (i.e. shared access for bicycle and bin storage).*

Bicycle cages have been provided to provide additional security measures for the bikes of future occupants. The response is provided in the enclosed drawing of the proposed bike store prepared by O'Mahony Pike Architects (Drawing No. DR-A-1001).

- c) The provision of bicycle parking spaces for staff of the retail unit should be incorporated as per Table 1 of Appendix 5 of the 2022-2028 Dublin City Development Plan.*

In response to this point, 4 no. cycle parking spaces have been provided within the proposed development to serve the proposed café.

- d) Provision for adapted bikes and e-charging facilities are required to be incorporated.*

2 no. adapted bikes spaces have been provided within the proposed development, and the necessary infrastructure to provide for e-charging facilities for bikes is also incorporated into the proposed development as requested.

- e) Detailed drawings of all bicycle parking areas should be included in the final LRD application, ensuring adequate separation distances between racks & internal access corridors for ease of access and functionality without conflict with landscaping proposals or walls (refer to the Cycle Design Manual, 2023).*

Detailed bicycle parking drawings are included in the submitted Architectural Drawing pack prepared by O'Mahony Pike Architects. The response is provided in the Drawing No's. DR-A-1000 and DR-A-1001.

- f) The applicant should include clarification regarding the allocation of the bicycle spaces for staff, students, retail unit and visitors, including management strategy for these.*

A total of 452 no. cycle parking spaces have been provided, which include 373 no. cycle parking spaces for future occupants of the scheme, 75 no. visitor parking spaces as well as 4 no. cycle parking spaces to serve the café which is in full compliance with the standards as included in the Dublin City Development Plan 2022-2028.

3(3) Site Servicing & Operations requires review:

- a) The applicant should demonstrate how each of the four issues raised in the RSA can be appropriately addressed. Where no amendments are proposed, a justification for same should be submitted for such.*

In response to the Road Safety Audit, the following changes have been made to the proposed development:

- Changes to the landscape plan to ensure that there is no conflict with pedestrians or proposed trees, or any auto-track for the fire tender and refuse vehicle.
- Removal of outdoor seating area to serve the café.

Due to pedestrian safety concerns and possible conflict with refuse/fire tender vehicles, it was not possible to provide a taxi set-down area to serve the proposed development.

- b) The applicant should provide scaled auto-tracking drawings for delivery vehicles within the turning head of the proposed development to demonstrate that access and egress of same can be safely achieved.*

Auto-track drawings have been prepared by MHL Consulting Engineers which highlight that access and egress of refuse and fire tender vehicles safely.

- c) The applicant should clarify if bin storage for the commercial aspect of the site is proposed to be incorporated within the red-line boundary and how this will be managed.*

Commercial refuse will be stored in the same bin store as the residential refuse. The waste produced from the café will be managed in accordance with the submitted Operational Waste Management Plan prepared by AWN.

- d) *Details regarding the student accommodation's bin management and staging area should be submitted. If necessary, a new refuse auto tracking should be submitted, demonstrating sufficient space for staging bin area and reverse manoeuvres, as the site has limited space for manoeuvres as proposed.*

As outlined previously, auto-track drawings have been prepared by MHL Consulting Engineers, demonstrating that it can safely enter and leave the site safely. Refuse will be managed in line with the submitted Operational Waste Management Plan prepared by AWN.

3(4) Other Issues:

- a) *The applicant should submit revised drawings overlaying the CBC route with the proposed development to ensure it does not preclude future road improvement works on Prussia Street.*

A Drawing has been prepared by MHL Consulting Engineers which overlays the site layout plan with the CBC/BusConnects Route confirming that the proposed development will not preclude future road improvement work on Prussia Street (The response is provided in the Drawing No. 23104TT_BC).

3.4 Drainage Issues

- 4(a) *An updated Basement Impact Assessment should be submitted. Prior to submission of a planning application for this development, the applicant should consult with the Drainage Planning, Policy and Development Control (DPPDC) section to ensure all inadequacies of the BIA report, and all concerns about the basement development, are addressed.*

An updated Basement Impact Assessment has been prepared by Horgan Lynch Consulting Engineers and is submitted with this planning application.

- 4(b) *The applicants should submit a Site Specific Flood Risk Assessment for the proposed development. The assessment should identify and propose design solutions to mitigate the potential risks from all sources of flooding including coastal, fluvial, pluvial and groundwater. Reference should be made to the DEHLG/OPW Guidelines on the Planning Process and Flood Risk Management published in November 2009 and the Dublin City Development Plan 2022-2028 Strategic Flood Risk Assessment.*

An independent Site-Specific Flood Risk Assessment has been prepared by JBA Consulting Engineers which confirms that the site is not at risk of flooding from any potential sources.

- 4(c) *The Drainage Planning, Policy and Development Control (DPPDC) section is not in favour of underground attenuation tanks. In accordance with the Dublin City Development Plan 2022-2028, blue roofs are proposed to be utilised throughout the development. However, the residual storage requirements should be provided via alternatives to the underground tank, such as storage in permeable paving subbase.*

There are no underground attenuation tanks proposed to serve the site, instead a permeable paving sub-base has been included to collect surface water from the site before it discharges off-site. The response is provided in the Drawing No. KC12-V1-XXX-DR-HLCE-CE-0006 for further details.

4(d) The Horgan Lynch green/blue roof layout does not align with the architect's roof plan. Updated plans should be submitted.

Updated Engineering and Architectural Drawings have been prepared by Horgan Lynch Consulting Engineers in conjunction with O'Mahony Pike Architects which ensure that the Green/Blue Roof Strategy aligns.

4(e) The storm water management criteria set out in Section 16 of the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 must be addressed. In particular, the applicant should address the interception storage requirements. Full calculations for the storage requirements and provisions at each storage location on site shall be provided.

A Surface Water Management Strategy has been prepared by Horgan Lynch which has been prepared to be compliant with the criteria set out in Section 16 of the Greater Dublin Regional Code of Practice for Drainage Works and includes full calculations and storage locations for each of the SuDS measures incorporated into the proposed development.

4(f) The existing public surface water sewer through the site should be indicated on the drainage layout, along with separation distances between the sewer and proposed buildings.

In the absence of infiltration tests carried out at the site, a very conservative infiltration rate has been assumed by Horgan Lynch Consulting Engineers of 3mm /hour. This conservative figure has been adopted into the storm water drainage design, resulting in large storage areas in the form of detention basins, swales, rain gardens and permeable paving sub-base. The response is provided in the Engineering Drawings and Reports prepared by Horgan Lynch Consulting Engineers for further information.

4(g) If infiltration rates on site have not yet been established, an alternative to the infiltration devices should be established, in case of poor infiltration rates.

As outlined above, In the absence of infiltration tests carried out at the site, a very conservative infiltration rate has been assumed by Horgan Lynch Consulting Engineers of 3mm /hour. This conservative figure has been adopted into the storm water drainage design, resulting in large storage areas in the form of detention basins, swales, rain gardens and permeable paving sub-base. The response is provided in the Engineering Drawings and Reports prepared by Horgan Lynch Consulting Engineers for further information.

4(h) Finally the applicant was informed that full design details for the SuDS devices including the green & blue roofs (and associated flow controls), infiltration devices, rain garden, swale, and permeable paving shall be provided.

The full design details of the SuDS devices are included in the Storm Water Drainage Management Report prepared by Horgan Lynch Consulting Engineers.

3.5 Parks, Biodiversity and Landscape Issues

5(a) In accordance with the Development Plan Vol 2 Appendix 6, 7.0, a rationale for compensatory measures applied to mitigate any shortfall in the minimum standards, shall be submitted.

No compensatory measures have been applied to the proposed development in terms of Daylight/Sunlight as the development fully complies with the relevant standards. The response is provided in the enclosed Sunlight/Daylight Impact Assessment prepared by ARC Consultants for further information.

5(b) The lane access from Prussia Street shall be surfaced in predominantly natural stone materials.

Due to the infiltration rates of the site and need to omit any attenuation tanks on site, this area has been surfaced in permeable paving. We wish to highlight to the Council, however, that this paving resembles natural stone so will look very similar, therefore not detracting from the Prussia Street Conservation Area.

5(c) The scheme shall allow 50% of all external seating to have arm & back rests which shall be referenced in the landscape submission.

The Landscape Masterplan as designed will ensure that 50% of the proposed seating will have arm and back rests. The response is provided in the enclosed Landscape Design Statement prepared by Doyle O'Troithigh Landscape Architects for further details.

5(d) The scheme shall allow 50% of external cycle stands to be covered.

In accordance with the Council's request 50% of external cycle stands will be covered.

5(e) A schedule of materials /external furniture/recreational units shall be submitted.

A full schedule of materials is included in the Landscape Drawing Pack prepared by Doyle O'Trioithigh Landscape Architects.

5(f) A section from the proposed building façade through the boundary and T7 with measured canopy shall be submitted.

A drawing has been prepared by Doyle O'Trioithigh Landscape Architects which confirms that the T7 tree canopy will not be impacted by the construction of the proposed development as confirmed in the drawings by Doyle O'Trioithigh Landscape Architects and Arboricultural Assessment prepared by Charles McCorkell Arboricultural Consultancy).

5(g) A tree protection plan shall be submitted.

A Tree Protection Plan has been prepared by Charles McCorkell Arboricultural Consultancy which is submitted with this planning application.

5(h) A tree bond will apply to the development (subject to permission) and the value will be determined by CAVAT or Halliwell methods. Professional arboricultural supervision of the works in proximity to trees will also be required during construction.

This point is noted. The project Arborist Charles McCorkell will be appointed to supervise works in proximity to the trees during the construction, and the application is willing to accept a condition requiring same.

5(i) A heat map of cumulative external spaces daylight/sunlight results shall be submitted.

A heat map of the external spaces is included in the Sunlight and Daylight Analysis Report prepared by ARC Consultants.

5(j) The following are to be submitted:

-An Appropriate Assessment Screening Report.

-An Ecological Impact Report (including bat survey and invasive alien species survey).

-A biodiversity enhancement plan-This shall include relevant mitigation measures (e.g. control of external lighting for bats) as well as other biodiversity enhancement measures

that can be incorporated into the architecture and landscape architecture proposals (e.g., bird & bat boxes).

An Appropriate Assessment Screening Report and Ecological Impact Assessment including bat survey and invasive species has been prepared by Altamar Marine and Environmental Consultancy.

Biodiversity enhancement is being implemented through the design of the landscaped areas. The response is provided in the enclosed Landscape Design Statement for further details.

5(k) A finalised Landscape Masterplan shall be submitted, including detailed CGIs of each communal open space area, boundary treatments, details of control barrier between lane to Prussia Street and internal open spaces, outline planting material specification and hardscape materials.

The response is provided in the enclosed Landscape Design Statement prepared by Doyle O'Troithigh Landscape Architects which includes details 3D sketches of each of the open spaces proposed. Drawings showing the boundary details for the entrance gate onto Prussia Street as well as the Western Boundary are included in the Landscape Drawing pack.

5(l) A green roof plan shall be submitted inclusive of biodiverse habitat planting/measures. The applicant shall refer to the new DCC green/blue roof guidelines.

A green roof plan inclusive of biodiverse habitat planting has been prepared by Doyle O'Troithigh Landscape Architects.

3.6 Any Other Business

6(a) An updated, detailed, project-specific desktop Archaeological Assessment is required. This should be carried out in consultation with the City Archaeologist. In the event of a grant of permission, the removal of the ground slab should be monitored under licence and post-demolition archaeological testing should be carried out at a pre-construction stage.

An Archaeological Assessment has been prepared by John Cronin and Associates which confirms that there are no signs of any archaeological remains within the site due to the nature of the site where the ground has been altered over the years and has been levelled and concreted over.

We wish to highlight that having undertaken desktop research and a review of available geotechnical data, the Archaeologist has recommended that this suggested mitigation measure be adjusted and that, in the event of a grant of planning permission, that a planning condition stipulating a targeted programme of pre-development archaeological test trenching take place (ahead of widespread demolitions and clearance at the site). The northern area, where the sheds stood until late 2022 would be a suitable place for such pre-development testing as it is the only area with a modicum of potential for the survival of any archaeological deposits.

The results of the programme of archaeological testing should be submitted to Dublin City Council and the National Monuments Service for consideration. Should any archaeological deposits or features be identified during this work, further mitigation measures shall be agreed upon in consultation with these bodies (including, and not limited to, archaeological monitoring of demolition and site development works).

6(b) The application material should include a demolition justification report to set out the rational for the demolition having regard to the 'embodied carbon' of existing structures and demonstrate that all options other than demolition, such as refurbishment, extension or retrofitting are not possible; as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures, in line with Section 15.7.1 of the Dublin City Development Plan 2022-2028 should be included with the application.

The existing warehouse structures on site are in very poor condition, and some are likely to fall down in the coming years if the site is not re-developed. These warehouse buildings have been long neglected and were in very poor condition and in need of significant upgrading to bring them back to use. On this basis, the decision was therefore made to fully re-develop the site to make the most efficient use of the site and has been designed to meet the current guidelines in terms of planning policy and Guidelines where active land management is encouraged. In addition the proposed development will provide modern accommodation built to current Building Regulations and represents the most sustainable and efficient use of the site, than the previously industrial use of the site which is not compatible with the surrounding residential properties.

6(c) A Climate Action Energy Statement in line with Section 15.7.3 of the Dublin City Development Plan 2022-2028 should be included with the application.

A Climate Action and Energy Statement has been prepared by DKP Partnership which has been prepared to demonstrate how low carbon energy and heating solutions have been considered as part of the overall design and planning of the proposed development.



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Accreditations
ISO 9001:2015
ISO 14001:2015
ISO 45001:2018