hw planning

Statement of Consistency

Proposed Student Accommodation Development at Prussia Street, Dublin 7.

Client: Lyonshall Limited

March 2024

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Introduction

1.1 Purpose of Statement

The adopted LRD legislation specifies that all LRD applications must be accompanied by a statement which demonstrates that they are consistent with the Development Plan policies specific to each Local Authority.

This statement of consistency has been compiled in a hierarchy according to National, Regional and Local Policy. A summary of the relevant policy from each publication has been provided in tabular format with associated comments on how the proposed scheme is consistent with same.

1.2 Site Location and 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 north[1].

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 Dunboyne, making the site a highly accessible location.

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National Planning Policy

2.1 National Student Accommodation Strategy

The Strategy was released as a follow up to the Rebuilding Ireland National Strategy for Housing and Homelessness and seeks an expanded and improved student accommodation sector capable of meeting the needs of our growing third level population into the future. It outlines ambitious targets including the delivery of an additional 7,000 purpose-built student accommodation (PBSA) bed spaces by the end of 2019 and an additional 21,000 by 2024. The strategy estimates that for every 4 students housing in PBSA or digs, an additional housing unit is freed up in the private rented sector. The strategy also identifies the existing demand for student housing and projects will continue past 2020, which has been exacerbated due to the Covid-19 pandemic with delays to construction, in addition to shortages in raw materials material. The document also identifies that in terms of provision of PBSA spaces, Dublin has failed to keep pace with growth in student numbers, creating a situation whereby the market is structurally under-supplied.

Policy	Consistency
By developing and utilising an appropriate Management Plan for PBSA, the managers of PBSA can minimise any potential negative impacts from the development and its occupants on surrounding properties and neighbourhoods and can create a positive and safe living environment for students and develop and enhance the neighbourhoods in which they are situated for the betterment of the whole community.	The proposed development is accompanied by an Operational Student Management Plan which includes various security measures, operational measures in relation to maintenance and waste disposal, a travel plan, measures focussing on neighbourhood relations and management of summer lettings.
All developers and managers of PBSA should put in place an appropriate Management Plan for PBSA in order to minimise potential negative impacts of the development and its occupants on surrounding properties and neighbourhoods and to create a positive and safe living environment for students and develop and enhance the neighbourhoods in which they are situated for the betterment of the whole community.	The proposed scheme is accompanied by an Operational Student Management Plan outlining the various operational and security measures and complaints procedures to ensure that there will be no negative impacts to existing residents of the area or future residents of the scheme.
Demand for PBSA bed spaces in Cork by 2024 is expected to be 7,391, 1,901 in excess of predicted	The proposed development will provide 373 bedspaces in a purpose-built student accommodation which aims to contribute towards the current shortfall in this type of

supply. Current supply as of the most available data[2] (Q3 2019), is 4,969 bed spaces.	development within the area surrounding TU Dublin, Trinity College and Griffith College as well as other 3rd level institutes located within Dublin City.

2.2 Housing for All: A New Housing Plan for Ireland

The action Plan for housing and homelessness is based around 4 pathways which aim to allow for the building of more homes to suit the populations needs, as well as improving the rental sector. The document recognises that the delivery of PBSA has significant potential to ease pressure on the private rented sector. The plan includes a number of action points relating to the 4 pathways.

Policy	Consistency
Housing Policy Objective 2.1 no. 2.11 Support diversification of housing stock and increase availability of rental stock by supporting the development of Purpose-Built Student Accommodation by Technological Universities.	This action plan emphasises the need for purpose-built student accommodation for Technological Universities such as Technological University Dublin (TU Dublin) which is within walking distance of the application site. The proposed development will contribute 441 no. bedspaces, therefore increasing the housing stock and availability of student accommodation at this location.

2.3 Project Ireland 2040: National Planning Framework

The National Planning Framework outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. The Framework is underlined by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The purpose of the NPF is outlined as being to enable all parts of the country to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role.

Policy	Consistency
National Policy Objective 2A - A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs. *National Policy Objective 3B* - Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints	The proposed development will contribute towards addressing the identified deficit of student housing in Dublin as outlined in the National Student Accommodation Strategy. This will in turn free up additional residential housing in the local area. The strategy estimates that for every 4 students housed in either PBSA or digs, an additional housing unit in the private rented sector is made available, therefore the proposed development would facilitate for approximately

[2] National Student Accommodation Strategy Progress Report – Quarter 3 2019.

	110 no. housing units coming back onto the market for rent or sale.
National Policy Objective 13 - In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.	The proposed development exceeds the prevailing height of the area, however, the scale of the development is appropriate to the site and location, recent planning precedent and will make a positive contribution to this underutilised brownfield site. In addition, the Townscape and Visual Impact Assessment that accompanies the application demonstrates that the proposal will not have significant negative visual impacts on the area.
Page 95 - Demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas in particular. In the years ahead, student accommodation pressures are anticipated to increase. The location of purpose-built student accommodation needs to be as proximate as possible to the centre of education, as well as being connected to accessible infrastructure such as walking, cycling and public transport. The National Student Accommodation Strategy supports these objectives.	The proposed development is located within 250m of Technological University Dublin, 2.26km of Trinity College and 2.8km from Griffith College. 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. It is also well connected to a number of bus routes including Dublin Bus no's. 37, 39, 39a, 70 and 70n connecting the site to Dublin City Centre, Blanchardstown, UCD and Dunboyne as well as the larger rail and bus transport hubs located in the City Centre.

2.4 Sustainable Residential Development and Compact Settlement Guidelines

These Guidelines were published by the Government in January 2024 and set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines mainly apply to Residential Development and are mute on the provision of Student Accommodation with the exception of the calculation of density on page 18.

Policy	Consistency
Table 3.1 of the SRDCSG sets out areas and density ranges for Dublin and Cork City and Suburbs, where the proposed development is located in the 'City Centre' where densities in the range of 100-300 units per hectare is deemed acceptable.	The proposed development sits in the middle density range at 161.3 units per hectare[3]. Given the sites proximity to Dublin City Centre, as well as the LUAS and Dublin Bus routes, the site is

[3] 4 bedspaces equivalent to 1 unit as per the draft Sustainable and Compact Settlement Guidelines (p18).

Table 3.1 - Areas and Density Ranges Dublin and Cork City and Suburbs

City - Centre

The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods[6], are the most central and accessible urban locations nationally with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork.

City - Urban Neighbourhoods

The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations[7], (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.

City - Suburban/Urban Extension

Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development[8]. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

Table 3.8 of the SRDCSG 'Accessibility' further expands on appropriate densities at specific locations identifying criteria for 'High-Capacity Public Transport Node or Interchange' locations, 'Accessible Locations', 'Intermediate Locations' and 'Peripheral Locations' which are described as 'Lands that do not meet the proximity or accessibility criteria detailed above'.

Table 3.8: Accessibility

High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail[11], light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'[12] stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Accessible Location

- Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

considered to be adjacent to a high-capacity public transport node/interchange.

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 suitable for higher density development in line with the guidelines.

2.5 Design Urban Manual for Urban Roads and Streets. (DMURS)

DMURS provides guidance relating to the design of urban roads and streets. The document presents a series of principles, approaches and standards that are necessary to achieve balanced, best practice design outcomes with regard to street networks and individual streets. The relevant principles, approaches and standards listed in the table below are intended for use by suitably qualified and experienced designers who work within the built environment professions in order to create attractive streets and roads which facilitates a broad range of users.

The proposed layout has been designed in accordance with the standards and requirements of DMURS. A DMURS Compliance statement and Road Safety/Quality Audit prepared by MHL & Associates accompanies this application.

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Regional Planning Policy

3.1 Eastern and Midlands Regional Assembly: Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) sets out a 12-year strategic development framework for the Southern Region. It establishes a broad framework for development and the way in which our society, environment, economy and the use of land should evolve and works towards a broad vision of the Region's future, identifying key priorities for investment. In respect of Dublin City, the strategy supports the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is coordinated with the delivery of key infrastructure projects. The subject site is located within the area governed by the defined Dublin Metropolitan Area Strategic Plan (MASP). The guiding principles for the development of this area include the following:

Policy	Consistency
Compact sustainable growth and accelerated housing delivery: To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.	The proposed development is located in an existing major population centre and proposed increases in population are in accordance with the objective of the National Planning Framework as reflected in the RSES. The proposed development site is not subject to flood risk and poses no impact to the nearest European Sites in located in Dublin Bay (South Dublin Bay and River Tolka Estuary SPA).
Integrated transport and land use: To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.	The proposed development, due to its proximity to Dublin City will provide for increased population growth in an area that is well served by existing public transport linkages and will promote non-car modes of transport.

Consolidation and Re-Intensification: RPO 4.3 - Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects	The proposed development is located on an inner city brownfield site which is currently vacant and underutilised. The re-use of the site for PBSA will provide a high-density development within the existing serviced and built up area of Dublin City.

3.2 Dublin Metropolitan Area Strategic Plan (MASP)

The RSES includes a more detailed Dublin Metropolitan Area Strategic Plan (MASP) which identifies strategic development and employment areas for population and employment growth, in addition to more generalised consolidation and re-intensification of infill, brownfield and underutilised lands within Dublin City and its suburbs. A response to the aims of this MASP are detailed below:

Guiding Principles	Consistency
Compact sustainable growth and accelerated housing delivery: To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport. **Co-ordination and active land management:** To enhance co-ordination across local authorities and relevant agencies to promote more active urban development and land management policies that help develop underutilised, brownfield, vacant and public lands.	The proposed development is located on an inner city brownfield site which is currently vacant and underutilised. The re-use of the site for PBSA will provide a high-density development within the existing serviced and built up area of Dublin City, therefore increasing and diversifying the housing supply in this location.
Integrated transport and land use: To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and	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. 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

Metro Link, while maintaining the capacity and safety of strategic transport networks.	highly accessible location in close proximity to existing high-quality public transport corridors.

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Local Planning Policy

4.1 Dublin City Development Plan 2022-2028

The Dublin City Development Plan 2022 (CDP) outlines objectives and parameters for housing development in the City up to the year 2028 and beyond. The CDP is underpinned by a number of key principles which include sustainability, social inclusion, high quality design and climate change adaptation. Chapter 2 outlines the Core Strategy for the City over the lifetime of the Plan. The strategy identifies a hierarchy in the network of settlements and divides the city into different strategic areas to focus growth in appropriate locations and to ensure a sustainable, compact, plan-led future for Dublin.

Policy	Consistency
CS07 – Promote Delivery of Residential Development and Compact Growth: To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas. **CS08 – Promote Active Land Management:** To promote active land management including the vacant site levy and the Living City Initiative as a means to encourage brownfield development and densification in the city.	The proposed development of 373 no. student bedspaces will positively contribute to the housing supply targets by freeing up to approximately 93 no. private housing through the delivery of purpose-built student accommodation, therefore helping to address the current housing shortage in the city. The subject site is an underutilised brownfield site situated in Prussia Street located within the inner city of Dublin which is easily accessible on foot, bicycle and public transport to amenities and services across the city. The proposed development will contribute positively to achieving compact growth targets, while also reflecting the sites unique setting and characteristics.
CA3 - Climate Resilient Settlement Patterns, Urban Forms and Mobility: To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019. **CA8 - Climate Mitigation Actions in the Built Environment:** To require low carbon development in the city which will seek to reduce carbon dioxide emissions and which will	The proposed development has been designed to promote sustainable modes of travel as no car parking spaces are proposed to serve the future occupants of the development. This shift towards more sustainable modes of travel will be promoted through the submitted Mobility Management plan and Operational Student Management Plan. A Climate Action and Energy statement accompanies this submission which demonstrates demonstrate how low carbon energy and heating solutions, have been

meet the highest feasible environmental standards during construction and occupation, see Section 15.7.1 when dealing with development proposals. New development should generally demonstrate/ provide for: a. building layout and design which maximises daylight, natural ventilation, active transport and public transport use; b. sustainable building/services/site design to maximise energy efficiency; c. sensitive energy efficiency improvements to existing buildings; d. energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments; e. on-site renewable energy infrastructure and renewable energy; f. minimising the generation of site and construction waste and maximising reuse or recycling; g. the use of construction materials that have low to zero embodied energy and CO2 emissions; and h. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible. **CA10 - Climate Mitigation Actions in the Built Environment:** All new developments involving 30 residential units and/or more than 1,000sq.m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.	considered as part of the overall design and planning of the proposed development.
CA24 – Waste Management Plans for Construction and Demolition Projects: To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements.	A Construction and Demolition Waste Management Plan has been prepared by Clancy Construction and forms part of this pre-consultation submission.
SC1 – Consolidation of the Inner City: To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman,	The application site is located on Prussia Street which forms part of the inner city. The proposed development has been designed to make the most efficient use of this vacant brownfield site which is easily accessed by foot, bicycle and public transport therefore meeting the

Stoneybatter, Smithfield, the Liberties, the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas.	concept of compact growth. The proposed development through the location of the inclusion of a café, will help activate this part of the street and will increase footfall at this location therefore increasing the likelihood of further regeneration in this area.
SC5 – Urban Design and Architectural Principles: To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.	As detailed in the attached Architectural Design Statement prepared by Deady Gahan Architects and the Landscape Design Statement prepared by Doyle O' Troithigh Landscape Architects, confirm that the proposed development is in accordance with the 'Urban Design Manual: A Best Practice Guide' regarding the provision of sustainable residential development. The proposed use and unit types will promote sustainable modes of travel, social interactions, and high-quality living. The proposed development is of an appropriate density, scale and form reflecting of the sites setting in the wider evolving urban context. The site is located within walking distance of Dublin City centre and bus routes connecting the site to various locations across Dublin, all of which will further promote the use of sustainable travel.
SC10 – Urban Density: To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof. **QHSN10 – Urban Density:** To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.	The proposed development is consistent with SC10 through its appropriate use of density, which complements the sites' location within the evolving development context in proximity to the TU Dublin Campus and Dublin City. The proposed development is primely positioned to benefit from existing and planned amenities and in addition to any public transport improvements.
SC11 – Compact Growth: In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities	The proposed development of 373 no. student bedspaces will positively contribute to the housing supply targets by freeing up to approximately 93 no. private housing

through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will: ▪ enhance the urban form and spatial structure of the city; be appropriate to their context and respect the established character of the area; ▪ include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents; ▪ be supported by a full range of social and community infrastructure such as schools, shops and recreational areas; ▪ and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.	through the delivery of purpose-built student accommodation, therefore helping to address the current housing shortage in the city. The subject site is an underutilised brownfield site situated within the existing Dublin inner city, which is easily accessible on foot, bicycle and public transport to amenities and services. The proposed development at 161 units per hectare will contribute positively to achieving compact growth targets, while also reflecting the sites unique setting and characteristics.
SC12 – Housing Mix: To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.	A total of 123 no. studio apartments and 43 no. cluster apartments are included in the proposed development which is considered appropriate given the current shortage of studio student bedspaces in Dublin as identified by the future operator of the scheme.
SC14 – Building Height Strategy: To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4. **SC16 – Building Height Locations:** To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. **SC17 – Building Height:** To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height: ▪ follow a design led approach; ▪ include a masterplan for any site over 0.5ha;	The proposed development is in accordance with the objectives for height as set out in the CDP. The proposed development will positively integrate with the surrounding area delivering much needed Student Accommodation in close proximity to the TU Dublin Campus at an underutilised, zoned and central/accessible site.

▪ make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context; ▪ deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; ▪ Do not affect the safety of aircraft operations at Dublin Airport (including cranage); and Have regard to the performance-based criteria set out in Appendix 3. All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.	
SC19 – High Quality Architecture: To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods. **SC20 – Urban Design:** Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2019). **SC21 – Architectural Design:** To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change. **SC23 – Design Statements:** That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15. **QHSN6 – Urban Consolidation:** To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.	The proposed development as designed by the project architects O'Mahony Pike Architects is of a high-quality and responds to the character of Prussia Street while ensuring that the site is developed to its maximum potential. The proposed development and layout will promote positive placemaking and a new sustainable neighbourhood in accordance with SC20. The proposed development represents a brownfield development which will create synergies with the existing urban fabric, and represents high quality urban design. A Design Statement has been prepared by the project architects O'Mahony Pike, which sets of the proposed developments compliance with the principles included in Chapter 15. A further assessment of these policies and objectives is also included in the Planning Statement prepared by HW Planning.

QHSN11 – 15-Minute City: To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.	The proposed student accommodation development in close proximity to TU Dublin and Dublin City represents a higher density brownfield development (116 units per hectare) which facilitates permeability and access to public transport, in accordance with the '15-minute city' concept identified in QHSN11.
QHSN16 – Accessible Built Environment: To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities.	As detailed in the enclosed Architectural Design Statement and plans prepared by Forestbird Design, the courtyard space and landscaped areas within the development will be accessible to all students occupying the scheme and will be managed in accordance with the Student Management Plan.
QHSN17 – Sustainable Neighbourhoods: To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.	The proposed development and layout will promote positive placemaking and a new sustainable neighbourhood in accordance with QHSN17. The proposed development represents a brownfield development which will create synergies with the existing urban fabric of Prussia Street and represents high quality urban design.
QHSN44 – Build to Rent/Student Accommodation/Co-living Development: It is the policy of DCC to avoid the proliferation and concentration of clusters of build to rent/student accommodation/co-living development in any area of the city. **QHSN45 – Third-Level Student Accommodation:** To support the provision of high-quality, professionally managed and purpose built third-level student accommodation in line with the provisions of the National Student Accommodation Strategy (2017), on campuses or in appropriate locations close to the main campus or adjacent to high-quality public transport corridors and cycle routes, in a manner which respects the residential amenity and character of the surrounding area, in order to support the knowledge economy. Proposals for student accommodation shall comply with the 'Guidelines for Student Accommodation' contained in the development standards chapter. There will be a presumption against allowing any student	The proposed development supports TU Dublin, Trinity College and other third level institutions located in Dublin City by providing much needed purpose-built student accommodation in close proximity to such campuses. It is considered that the proposed development will not lead to an over-concentration of student accommodation. As outlined in the Student Demand and Concentration Report, the delivery of the proposed development would increase the concentration of students living within the subject site's small area 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.

accommodation development to be converted to any other use during term time.	In addition, the development has the potential to allow for up to 93 residential units to go back into circulation for the private market, therefore contributing to the alleviation of rental costs in the area and increasing the number of family homes for sale in this accessible location.
QHSN48 – Community and Social Audit: To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development.	A Community and Social Audit has been prepared by HW Planning which assesses the provision of community facilities and infrastructure within 750m of the application site.
SMT1 - Modal Shift and Compact Growth: To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth. **SMT4 - Integration of Public Transport Services and Development:** To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places. **SMT6 - Mobility Management and Travel Planning:** To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity. **SMT16 - Walking, Cycling and Active Travel:** To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.	The proposed development has been designed to promote sustainable modes of travel as no car parking spaces are proposed to serve the future occupants of the development. This shift towards more sustainable modes of travel will be promoted through the submitted Mobility Management Plan and Operational Student Management Plan. In line with Policy SMT4, the site is located along a public transport corridor with a number of bus routes serving 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. In addition, 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. The site is also within walking distance of the Technological University Dublin (TU) Grangegorman Campus (5-minute walk) and within cycling distance of Trinity College (11-minute cycle).

SMT33 – Design Manual for Urban Roads and Streets: To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.	A DMURS Statement of Consistency accompanies this submission which outlines that the proposed development as designed is in compliance with the standards as set out in this document.
SI22 – Sustainable Drainage Systems: To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design & Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity. **SI23 – Green and Blue Roofs:** To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's Green & Blue Roof Guide (2021) which is summarised in Appendix 11. **SI25 – Surface Water Management:** To require the preparation of a Surface Water Management Plan as part of all new developments in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance.	A Storm Water Management Plan has been developed by Horgan Lynch Consulting Engineers for the site which incorporates sustainable drainage systems/attenuation, this to manage the storm water and to control the run-off from the site. This storm water management plan incorporates a sustainable drainage design (SuDS) which includes the following features as well as an on-site attenuation tank: ▪ Blue roof technology (circa 50% of flat roofs) ▪ Intensive Green roof technology (circa 30% of flat roofs) ▪ Detention basins/winter gardens ▪ Open drainage channels ▪ Permeable asphalt in play areas ▪ Permeable paving in courtyards, cycle parking areas and access roads ▪ Swales ▪ Planters
SI29 – Segregated Storage and Collection of Waste Streams: To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate.	The proposed development is accompanied by a Student Management Plan which includes various security measures, operational measures in relation to maintenance and waste disposal, a travel plan, measures focusing on neighbourhood relations and management of summer lettings. An Operational Waste Management Plan will be submitted with the final LRD Planning Application.

15.13.1 Student Accommodation:

Section 15.13.1 of the Development Plan states that the Council will have regard to the following key factors when assessing PBSA developments:

- The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport.
- The proposal will not result in an excessive concentration of student accommodation (including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality.

As outlined previously, the proposed development supports TU Dublin, Trinity College and other third level institutions located in Dublin City by providing much needed purpose-built student accommodation in close proximity to such campuses.

It is considered that the proposed development will not lead to an over-concentration of student accommodation. As outlined in the Student Demand and Concentration Report, the delivery of the proposed development would increase the concentration of students living within the subject site's small area 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.

15.13.1.1 Unit Mix:

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

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

Table 15-7: Minimum Bedroom Sizes for Student Accommodation Clusters

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.

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 which is considered appropriate given the current shortage of studio student bedspaces in Dublin as identified by the future operator of the scheme.

Section 15.13.1.2 Daylight and Sunlight: Student accommodation should be designed to give optimum orientation in terms of daylight to habitable rooms. Given the nature of student occupancy, the residential standards in relation to dual aspect may be relaxed.	The Preliminary 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 daylight/sunlight or overshadowing.
Section 15.13.1.3 Communal Facilities: All proposals must provide appropriate indoor and outdoor communal and recreational facilities for students at a combined level of at least 5-7 sq. m. per bedspace. In addition, shared kitchen/living/dining rooms shall be provided within each student cluster, based on a minimum 4 sq. m. per bed space. This is in addition to any circulation space and communal space provided. **Table 15-8: Communal Requirements for Student Accommodation Clusters** 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	Communal facilities and services have been included within the proposed development to 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 (1791.3 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.
Section 15.13.1.4 Car and Cycle Parking: Designated car parking will not be supported in student accommodation schemes in the city. However, car parking for persons with disabilities should be provided. 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.	As no designated car parking will be supported by the Council to serve the proposed student accommodation, no car parking spaces are proposed. However, 1 no. disabled car parking space as Part M accessible units are proposed within the scheme.
Section 15.13.1.5 Temporary Use of PBSA as Tourist Accommodation: The use of Student Accommodation as temporary tourist accommodation will be considered outside the normal academic year. The tourist / visitor accommodation shall only be occupied for short-term letting periods of no more than two months and shall not be used as independent and separate self-contained permanent residential units.	The use of the proposed development as tourism accommodation during the summer months will be managed in accordance with the submitted Operational Student Management Plan.
15.15.2.2 Conservation Areas: It is outlined in the Development Plan that Conservation Areas delineated by a red-hatch areas do not have a specific statutory protection but contain areas of extensive groupings of buildings, streetscapes, features such as rivers and canals and associated open spaces of	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

historic merit which all add to the special historic character of the city. All planning applications for development in Conservation Areas shall: ▪ Respect the existing setting and character of the surrounding area. ▪ Be cognisant and/ or complementary to the existing scale, building height and massing of the surrounding context. ▪ Protect the amenities of the surrounding properties and spaces. ▪ Provide for an assessment of the visual impact of the development in the surrounding context. ▪ Ensure materials and finishes are in keeping with the existing built environment. ▪ Positively contribute to the existing streetscape Retain historic trees also as these all add to the special character of an ACA, where they exist.	area, but not preclude any appropriate forms of new development. The proposed development has been designed to tie in with the existing urban fabric of Prussia Street which acknowledging that the area is currently in transition with a number of new developments coming forward in the future which will change its character. This application is accompanied by a TVIA which assesses the impact of the proposed development on the surrounding area which 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."*
Section 15.18.4 Basements: It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is considered as being an accessible area positioned below the existing street level or ground level and would include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.	The submitted Basement Impact Assessment has been prepared by Horgan Lynch Consulting Engineers assesses the impact of the proposed basement on the ground conditions surrounding the application site.
Section 15.18.8 Solar Energy: Solar or PV panels allow solar energy to be utilised in the ongoing operation of a building. In line with NZEB requirements, Dublin City Council will require all new developments to provide for solar panelling / PV panels to contribute to the energy generation in a building where feasible.	The proposed development incorporates solar PV panels at roof level which will contribute to the energy rating of the building in addition to the installation of heat pumps and other features.

Appendix 3 – Achieving Sustainable Compact Growth

Objective	Higher Density Development - Performance Based Criteria	Consistency
To promote development with a sense of place and character	Enhanced density and scale should: ▪ respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints, ▪ have a positive impact on the local community and environment and contribute to 'healthy placemaking', ▪ create a distinctive design and add to and enhance the quality design of the area, ▪ be appropriately located in highly accessible places of greater activity and land use intensity, ▪ have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, ▪ not be monolithic and should have a well-considered design response that avoids long slab blocks, ▪ ensure that set back floors are appropriately scaled and designed.	The proposed development has been designed to fit in 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 4 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 building fronting out onto Prussia Street further integrates the proposed development with the existing streetscape. The re-use of the site will have a positive impact on the environment and contribute to healthy placemaking by making use of a vacant and underutilised site, and by providing an active street frontage at this location where a café is proposed. 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.
To provide appropriate legibility	Enhanced density and scale should: ▪ make a positive contribution to legibility in an area in a cohesive manner,	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

	▪ reflect and reinforce the role and function of streets and places and enhance permeability.	a gateway and hidden by 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. 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.
To provide appropriate continuity and enclosure of streets and spaces	Enhanced density and scale should: ▪ enhance the urban design context for public spaces and key thoroughfares, ▪ provide appropriate level of enclosure to streets and spaces, ▪ not produce canyons of excessive scale and overbearing of streets and spaces, ▪ generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3, ▪ provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.	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 provide a distinctive elevation on Prussia Street in keeping with the surrounding area. 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. 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.

To provide well connected, high quality and active public and communal spaces	Enhanced density and scale should: ▪ integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, ▪ be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards, ▪ ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16, ▪ ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development, ▪ ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated, ▪ provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.	The proposed development is already in a location well served by public transport including the LUAS and Dublin Bus as well as being withing walking and cycling distance of Dublin City. As previously outlined, the proposed external communal open space are well overlooked by bedroom and living room/ communal space windows therefore providing adequate passible surveillance. 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. The proposed development has been designed to meet Part M of the Building Regulations and proposes a level access from Prussia Street into the proposed development.
To provide high quality, attractive and useable private spaces	Enhanced density and scale should: ▪ not compromise the provision of high quality private outdoor space, ▪ ensure that private space is usable, safe, accessible and inviting, ▪ ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16, ▪ assess the microclimatic effects to mitigate and avoid negative impacts, ▪ retain reasonable levels of overlooking and privacy in residential and mixed use development.	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. 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. 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.
To promote mix of use and diversity of activities	Enhanced density and scale should: ▪ promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure, ▪ contribute positively to the formation of a 'sustainable urban neighbourhood', ▪ include a mix of building and dwelling typologies in the neighbourhood, ▪ provide for residential development, with a range of housing typologies suited to different stages of the life cycle.	The proposed development 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. Through the re-development of the site 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.
To ensure high quality and environmentally sustainable buildings	Enhanced density and scale should: ▪ be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, noise and views to minimise overshadowing and loss of light – see Appendix 16, ▪ not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain, ▪ ensure a degree of physical building adaptability as well as internal flexibility in design and layout, ▪ ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive, ▪ maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage,	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. 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.

	▪ be constructed of the highest quality materials and robust construction methodologies, ▪ incorporate appropriate sustainable technologies, be energy efficient and climate resilient, ▪ apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site, ▪ incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place, ▪ include a flood risk assessment. ▪ include an assessment of embodied energy impacts.	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. Horgan Lynch Consulting Engineers have been appointed and will prepare a SuDS Strategy and Flood Risk Assessment to accompany the pre-consultation request. A sustainability statement as required to meet section 15.7.1 of the Development Plan will be prepared and submitted with the pre-consultation request setting out an assessment of the embodied energy impacts of the proposed development.
To secure sustainable density, intensity at locations of high accessibility	Enhanced density and scale should: ▪ be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport, ▪ look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.	The proposed development is already in a location well served by public transport including the LUAS and Dublin Bus as well as being withing walking and cycling distance of Dublin City. 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.
To protect historic environments from insensitive development	Enhanced density and scale should: ▪ not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures	Preliminary photomontages have been prepared by Modelworks to accompany this pre-consultation request which confirms that the proposed development will not have an adverse impact on the character and setting of the Prussia Street

	and their curtilage and National Monuments – see section 6 below. ▪ be accompanied by a detailed assessment to establish the sensitives of the existing environment and its capacity to absorb the extent of development proposed, ▪ assess potential impacts on keys views and vistas related to the historic environment.	Conservation Area. A full Landscape and Visual Impact Assessment will accompany the pre-consultation request. An Architectural Heritage Context Report prepared by ARC also accompanies this request which confirms that the proposed development is in keeping with the pattern of development within the Prussia Street Conservation Area.
To ensure appropriate management and maintenance	Enhanced density and scale should: ▪ Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.	A Student Management Plan will be prepared for pre-consultation which will include 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.

Appendix 5 – Transport and Mobility: Technical Requirements

Guiding Principles	Consistency
Mobility Management and Travel Plans will be required for developments of different types and scales, to be determined at pre-application stage in consultation with Dublin City Council. Where a zero or reduced quantum of car parking is proposed for a residential development, a proactive mobility management strategy is essential at the early design stages to identify measures that will promote the use of sustainable modes within the development and ensure any associated infrastructure can be incorporated into the design. A Residential Travel Plan will be required to support the zero/reduced provision of car parking to serve a development.	Please find enclosed a Mobility Management Plan prepared by MHL Consulting Engineers which outlines the basis of the modal shift and travel planning for the site. It aims to support sustainable transport modes, reduce the impact of development based trip generation, and promote Active Transport. This document supports the car-free nature of the development in line with the policies and objectives of the Development Plan for PBSA developments.
Cycle Parking Standards:	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 spaces per

Category	Land-Use	Zone	Long Term	Short Stay/Visitor
Accommodation	Hotel[1]	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[2]	All Zones	1 per 5 staff 1 per 5 residents	1 per 10 residents
	Residential Apartment[3]	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

bedspace) plus an additional 75 no. visitor cycle parking spaces and 4 no. spaces to serve the proposed cafe.

Car Parking Standards:

Category	Land-Use	Zone 1	Zone 2	Zone 3
Accommodation	Hotel[1]	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[2]	1 per 20 bed spaces	1 per 10 bed spaces
	Houses Apartments/ Duplexes	0.5 per dwelling	1 per dwelling	1 per dwelling

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