THORNTON O'CONNOR
TOWN PLANNING

Planning Report and Statement of Consistency

Prepared in Respect of an LRD Application for Permission for the Provision of a Mixed-Use Student Accommodation & Commercial Development at a c. 0.962 Ha Site at Gowan House, Carriglea Business Park, Naas Road, Dublin, D12 RCC4

Prepared on Behalf of Malclose Limited

November 2023

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THORNTON O'CONNOR
TOWN PLANNING

Planning Department
Dublin City Council
Civic Offices
Wood Quay
Dublin 8

Wednesday, 22nd November 2023

Dear Sir/ Madam

RE: LRD APPLICATION FOR PERMISSION FOR THE PROVISION OF A MIXED-USE STUDENT ACCOMMODATION & COMMERCIAL DEVELOPMENT AT A c. 0.962 HA SITE AT GOWAN HOUSE, CARRIGLEA BUSINESS PARK, NAAS ROAD, DUBLIN, D12 RCC4

1.0 INTRODUCTION

1.1 Planning Application

Thornton O'Connor Town Planning[1] in association with a multidisciplinary team as detailed in the table below, have been retained by Malclose Limited[2] to prepare this application for a Large-Scale Residential Development ("LRD") comprising a mixed-use scheme principally comprising Student Accommodation at a c. 0.962 Ha site at Gowan House, Carriglea Business Park, Naas Road , Dublin, D12 RCC4.

Figure 1.1: Application Site Indicatively Outlined in Red

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2023)

[1] No. 1 Kilmacud Road Upper, Dundrum, Dublin 14 D14 EA89
[2] No. 28 The Drive, Graigavern Lodge Ballybrittas, Co. Laois, R32 FR92

The scheme principally comprises the demolition of existing office and warehouse structure on site and ancillary outbuilding (c. 5,172 sq m) and the construction of a mixed-use development including 941 No. student accommodation bedspaces with ancillary amenity space, a retail unit and cultural and community spaces.

A key tenet of the proposal is the proposal to daylight the existing culverted River Camac through the site, opening it up for the first time as seen in the CGI Images below and providing a significant gain in biodiversity for the wider area.

Figure 1.2: **CGIs of Proposed Daylighted River Camac Extending to 76 No. Metres**

(Source: **3D Design Bureau)**

1.2 Summary of the Proposed Development

The full description of the proposed development is as follows:

Malclose Limited intend to apply to Dublin City Council for a 7-year permission for a large-scale residential development principally comprising student accommodation at this 0.962 Ha site at Gowan House, Carriglea Business Park, Naas Road, Dublin 12, D12 RCC4.

Works to upgrade of the access road to the west of the site on an area measuring c. 0.081 Ha are also proposed comprising new surfacing to the carriageway, the provision of inbound and outbound bicycle lanes from the development entrance to the Naas Road, the provision of a controlled pedestrian crossing on the access road at the Naas Road junction, and the provision of a further uncontrolled pedestrian and bicycle crossing linking the subject site with the approved Concorde SHD development (ABP Ref: TA29S.312218) to the west.

On the Naas Road, works are proposed on an area measuring c. 0.086 Ha comprising the realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road and the provision of linkages from the realigned footpath to the development site, and the provision of new controlled pedestrian crossings across the eastbound and westbound carriages of the Naas Road and the provision of a new uncontrolled crossing of the Luas tracks.

The development site area and roadworks areas will provide a total application site area of c. 1.13 Ha.

The proposed development will principally consist of: the demolition of the existing two-storey office/warehouse building and outbuilding (5,172 sq m); and the construction of a development in two blocks (Block 1 (eastern block) is part 2 No. storeys to part 15 No. storeys over lower ground floor and basement levels with roof plant over and Block 2 (western block) is part 9 No. storeys to part 11 No. storeys over basement with roof plant over) principally comprising 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios) with associated facilities, which will be utilised for short-term lets during student holiday periods. The 871No. standard rooms are provided in 123 No. clusters ranging in size from 3 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (1,422 sq m internal and 131 sq m external) principally comprising a digital hub and co-working space with ancillary cafe; a retail unit (250 sq m); public open space; the daylighting of the culverted River Camac through the site; an elevated walkway above the River Camac at ground floor level; a pedestrian bridge link at first floor level between Blocks 1 and 2; vehicular access at the south-western corner; the provision of 7 No. car-parking spaces, 2 No. motorcycle parking spaces and 2 No. set down areas; bicycle stores at ground and lower ground floor levels; visitor cycle parking spaces; bin stores; substations; hard and soft landscaping; green and blue roofs; new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18 No. antennas and 6 No. transmission dishes, together with all associated equipment; boundary treatments; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 33,140 sq m comprising c. 30,386 sq m above lower ground and basement level.

1.3 7 Year Permission Sought

The Applicant is applying for a 7 year permission. Whilst the Applicant intends to promptly proceed to deliver the proposed development and notes that this scheme can and is intended to be completed well within the standard 5-year time period, they are also acutely aware of the increasingly litigious nature of the planning and development process. As well as the Applicant's personal experience on other sites in Dublin (student accommodation scheme at Our Lady's Grove in Goatstown), this is widely reported in news media and has fundamentally altered the day-to-day practices of Consultants working the planning and development sector. The risk of a Third-Party taking a judicial review of a decision by An Bord Pleanála is present for all applications and we note that the adjoining Concorde site remains under Judicial Review proceedings despite being granted permission on 15th December 2021, with no sign of a resolution on those proceedings.

Based on recent precedent, judicial reviews of planning decisions are often taking between 1 No. and 3 No. years to settle. By consequence, this markedly undercuts the time available to realise the permitted development as the Applicant dos does not secure any additional time to complete a development when Judicial Review proceedings are taken, thereby threatening its deliverability and feasibility, its viability and risking the need to re-enter the planning process once again. The foregoing is made more difficult by changes to Section 42 of the *Planning and Development Act 2000* (as amended) relating to extensions of duration of permission, which further limits the scope to secure same.

Consequently, it is considered that the minor addition of 2 No. years to the 5-year period would be a pragmatic action that de-risks the project in terms of its deliverability, provides additional certainty for the Applicant (who is also the Builder/Developer) and provides a great guarantee of the development being delivered for the City.

1.4 Multi-Disciplinary Team

COMPANY NAME	DOCUMENTS PREPARED
Thornton O'Connor Town Planning No. 1 Kilmacud Road Upper Dundrum Dublin 14 D14 EA89	• Planning Report and Statement of Consistency • Response to Dublin City Council LRD Opinion • Application Form • Community and Social Infrastructure Audit
HKR Architects 57 Great Suffolk Street London SE1 0BB United Kingdom	• Architectural Drawing Pack • Schedule of Accommodation • Architectural & Urban Design Report (including Community Safety Strategy)

Barrett Mahony Consulting Engineers Sandwith House 52-54 Sandwith Street Lower Dublin 2	• Civil Engineering Infrastructure & Surface Water Management Report • Flood Risk Assessment Report • Basement Impact Assessment • Walking & Cycle Audit • Residential Travel Plan • Road Safety Audit (Stage 1) • DMURS Statement of Consistency • Car & Cycle Parking Management Plan • Traffic Assessment • Site Investigation Report • Engineering Drawings
Stephen Diamond Associates 68 Pearse Street Dublin 2	• Landscape Drawings • Landscape Design Report
The Tree File Limited Ashgrove House, No. 26 Foxrock Court, Dublin 18, D18 R2K1	• Arboricultural Report • Arboricultural Drawing Pack
Enviroguide Consulting 3D Core C Block 71 The Plaza Park West Dublin D12 F9TN	• Appropriate Assessment Screening Report • Environmental Impact Assessment Screening Report (including a Section 103 Statement and a Bat Survey) • Ecological Impact Assessment • Biodiversity Enhancement Plan
AWN Consulting Limited The Tecpro Building No. 17 Clonshaugh Business and Technology Park Dublin 17	• Operational Waste Management Plan • Construction Environmental Management Plan • Resource and Waste Management Plan • Outline Delivery and Servicing Management Plan • Hydromorphological Report • Hydrological Risk Assessment • Water Framework Directive Screening Assessment • Inward Noise Impact Report
3D Design Bureau Unit 1, Adelphi House George's Street Upper Dún Laoghaire Dublin	• Preliminary Daylight and Sunlight Analysis • Verified View Montages and Computer-Generated Images

A96 DX47	
Delap & Waller Bloomfield House Bloomfield Avenue Dublin 8	• Part L Planning Compliance for the Mechanical and Electrical Services Installations • Climate Action, Energy & Sustainability Statement • Site Lighting Layout
Historic Building Consultants Old Bawn Old Connaught Bray Co. Wicklow	• Architectural Heritage Impact Assessment
Rubicon Heritage Office No. 8 Dominick Court 41 Dominick Street Dún Laoghaire Dublin A96 P525	• Archaeological, Architectural and Cultural Heritage Impact Assessment
Model Works The Old Courtyard Newtownpark Avenue Blackrock Dublin A94 YD61	• Townscape and Visual Impact Assessment
Turley 4 Pembroke Street Upper Dublin 2	• Cultural and Community Infrastructure (Impact) Assessment
IN2 Unit E&F Mountpleasant Business Centre Ranelagh Dublin 6	• Microclimatic Wind Analysis and Pedestrian Comfort Report
ISM No. 77 Camden Street Lower Dublin 2 D02 XE80	• Telecommunication Report

Malclose Limited No. 28 The Drive Graigavern Lodge Ballybrittas Co. Laois	• Student Management Plan
Derry O'Leary 4 Glengara Park Glenageary Co. Dublin A96 P6N2.	• Public Transport Capacity Study

1.5 LRD Application

The proposed scheme comprises 941 No. student accommodation bedspaces, cultural/community floorspace and a retail unit, with the non-residential element of the proposed scheme (c. 1,672 sq m) representing c. 5% of the total gross floor area of the development. Thus, the proposed development is classified as a Large-scale Residential Development ("*LRD*") as defined under the *Planning and Development (Amendment) (Large-scale Residential Development) Act 2021:*

> *"a) The development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;*
>
> ***b) The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;***
>
> *c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or*
> *d) The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c).*
>
> *where the LRD floor space of—*
>
> (i) in the case of paragraph (a), the buildings comprising the houses,
>
> ***(ii) in the case of paragraph (b), the student accommodation,***
>
> (iii) *in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation,* ***is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development."*** [Our Emphasis]

The purpose of this report is to provide an overview of the proposed development, demonstrating why the proposal is appropriate at the subject site and ultimately to seek the support of the Planning Authority for the proposal.

1.6 The Applicant's Development Experience

Malclose Limited, a subsidiary of Hollybrook Homes, have secured permission and developed multiple student accommodation schemes in the UK and Dublin. In the UK, they have provided student accommodation for the London School of Economics, the University of Arts, London and the University of Essex. In Dublin, they have secured permission for 698 No. bedspaces at the Our Lady's Grove site in Goatstown, Dublin 14, albeit it was recently overturned after a Judicial Review on a technical issue. As such, they have a track-record in the delivery of student accommodation bedspaces.

As Hollybrook have a construction arm that build their own schemes, work will commence very quickly if permission is granted.

In the context of the subject site, this was considered an ideal location for student accommodation due to its location beside the Luas, facilitating travel to a huge range of facilities including the City Centre to the east, Tallaght to the south-west and Ballyfermot College to the north-west.

As well as being Zoned Z14 where student accommodation is permitted in principle and being within a Strategic Regeneration Development Area (SDRA) in the *Dublin City Development Plan 2022-2028*, the site is designated as a residential-led mixed-use development site in the *City Edge Strategic Framework* as detailed further in this Report.

1.7 Documents Discussed Throughout this Report

The following documents are discussed throughout this Report:

National

1. *Project Ireland 2040: The National Development Plan 2021-2030;*
2. *Project Ireland 2040: National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
4. *Housing for All – a New Housing Plan for Ireland, September 2021;*
5. *National Student Accommodation Strategy (2017);*
6. *Guidelines on Residential Developments for 3rd Level Students (1999)*
7. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
8. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*

9. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009);*

10. *The Planning System and Flood Risk Management (2009); and*

Regional

11. *Regional Planning Guidelines for the Greater Dublin Area 2010-2022;*

12. *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly; and*

13. *Metropolitan Area Spatial Plan for Dublin City and Suburbs.*

Local

14. *Dublin City Development Plan 2022-2028*;

15. *Naas Road Local Area Plan 2013-2023 (now expired)*;

16. *The City Edge Strategic Framework*, 2022

It is through adherence to these documents and reference to their various tests, policies and criteria that this document aims to demonstrate how the proposed development is consistent with National, Regional and Local Planning guidance.

1.8 Format of this Report

This Planning Report and Statement of Consistency comprises the following sections:

Section	Content
1	Introduction
2	Site Location, Description, Context & Accessibility
3	Rationale for Development
4	Planning History
5	Detailed Description of the Development
6	National Policy – Statement of Consistency
7	Regional Policy – Statement of Consistency
8	Local Policy – Statement of Consistency
9	Conclusion

2.0 SITE LOCATION, DESCRIPTION, CONTEXT AND ACCESSIBILITY

2.1 Site Location and Description

The subject site and development comprise 3 No. elements as follows:

1. The **main development site** which measures 0.962 Ha.

2. The **access road to the west** of the site which measures c. 0.081 Ha which is proposed to be upgraded with works comprising new surfacing to the carriageway, the provision of inbound and outbound bicycle lanes from the development entrance to the Naas Road, the provision of a controlled pedestrian crossing on the access road at the Naas Road junction, and the provision of a further uncontrolled pedestrian and bicycle crossing linking the subject site with the approved Concorde SHD development (ABP Ref: TA29S.312218) to the west.

   It is noted that this road is in the Applicant's ownership.

3. An area measuring c.086 Ha on the **Naas Road** in DCC's ownership where works are proposed comprising the realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road and the provision of linkages from the realigned footpath to the development site, and the provision of new controlled pedestrian crossings across the eastbound and westbound carriages of the Naas Road and the provision of a new uncontrolled crossing of the Luas tracks.

For the rest of this Report the site area will be referenced as c. 0.962 Ha as this is the main development site and is the figure utilised when discussing plot ratio, site coverage etc.

The subject site which has an area of c. 0.9620 Ha (9,620 sq m) is located at the junction between Naas Road and Carriglea Industrial Estate entrance road/access road to the west.

The site currently comprises the existing Peugeot Ireland (Gowan Distributors Ltd) warehouse/office site at Gowan House, RCC4, a two-storey equivalent warehouse building with an associated outbuilding and 131 No. surface car-parking spaces. The Concorde Industrial Estate is located to the west of the site. An aerial map of the site location is provided in Figure 2.1 below.

Figure 2.1: **Map Showing the Location of Subject Lands as Outlined in Red (Indicative Only)**

(Source: **Google Maps, annotated by Thornton O'Connor Town Planning, 2023)**

2.2 Site Context

The surrounding area is characterised by a variety of uses. The subject lands are located within Carriglea Industrial Estate, which is surrounded by an agglomeration of business parks/industrial buildings albeit it is beginning to transform to a residential-led mixed use area. The business park/industrial environment is also proximate to residential developments such as the Landsdowne Gate Apartments located c.180 metres to the southeast of the subject site which is a 431 No. unit mixed-use residential development with office space at ground floor level and a creche, and with building heights of up to 10 No. storeys.

Most notably the mixed-use residential development at the former Corant Logistics on the Carriglea lands is located at the southeast boundary of the subject site, in Carriglea Industrial Estate, which is currently being constructed. The location of these two residential schemes can be seen in Figure 2.2 and 2.3 below.

Figure 2.2: **Aerial View of the Existing Residential Context Close to the Subject Site**

(Source: **Google Maps, annotated by Thornton O'Connor Town Planning, 2023)**

Figure 2.3: **View of Carriglea Lands Development to the Southwest of the Subject Site, Partly Constructed**

Source: **Google Maps, Annotated by Thornton O'Connor Town Planning, 2023**

With regard to the variety of uses in the context of the subject site, historical landmark Drimnagh Castle is located c.320 metres southeast (as the crow flies) of the subject site, whilst Drimnagh Castle Primary and Secondary schools are located c. 450 metres (as the crow flies) to the south of the subject site at Long Mile Road. ALDI Supermarket is located c. 310 metres (as the crow flies) to the south. A recreational sports ice-rink, 'Sparoid' children's activity indoor centre, and gyms such as 'D12 Performance' are amongst other businesses and uses located in Finches Industrial Park c. 300 metres south (as the crow flies) of the subject site. A map showing the surrounding context of the site is provided at Figure 2.4.

Figure 2.4: **Aerial Photograph identifying the location of the Subject Site (Indicatively Outlined in Red).**

(Source: **Google Maps, annotated by Thornton O'Connor Town Planning, 2023)**

2.3 Site Accessibility

The level of accessibility to the subject site is exceptionally high, with many public transport options available such as various bus and Luas stops. The location of the subject site on Naas Road enables easy access to the subject site from various locations. This includes access by car from the M50 and N7, located only c.2.2 kilometres southwest (as the crow flies) from the subject site, where the Red Cow Roundabout connects the Naas Road to the M50 and N7.

2.3.1 LUAS

The closest Luas stop to the subject site is Bluebell Luas Stop, located c. 150 metres to the east of the subject site, or a c.2-minute walking distance, as shown in Figure 2.5. Other nearby Luas stops are Kylemore and Blackhorse, both less than a kilometre from the subject site. The Line that serves this Luas stop is the Red Line which provides access between Connolly Station or The Point to either Saggart or Tallaght. The Red Line Luas stops can be seen in Figure 2.6 overleaf. The Luas allows access to the city centre in less than 20 minutes (and the green line if required) or southbound towards Tallaght and Citywest in less than 30 minutes. The Luas will be available for the future students of the proposed accommodation to use, providing routes to various locations in Dublin frequently. The operating hours and frequency of the Red Line Luas can be seen in Table 2.1 below.

Figure 2.5: Image Showing the Location of Subject Site from Bluebell Red Line Luas Stop (Facing Southwards on Naas Road).

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2022)

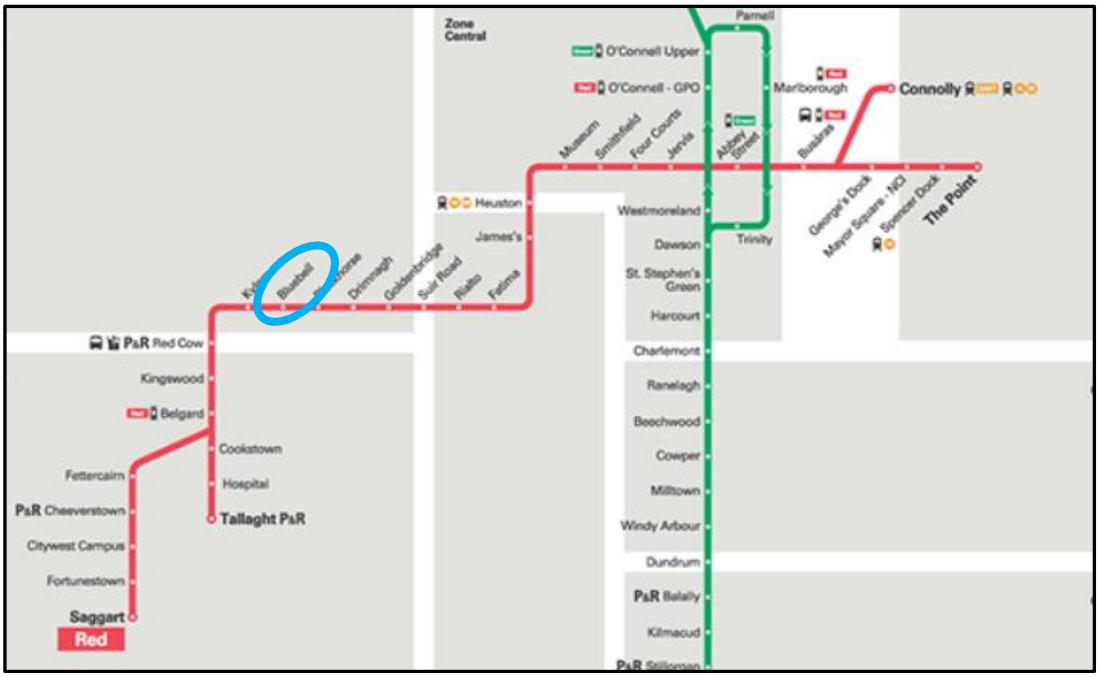

Figure 2.6: Luas Stop Map with Bluebell Luas Stop Circled in Blue

(Source: luas.ie, Annotated by Thornton O'Connor Town Planning, 2023)

	Operating Times	Peak Times	Frequency
Monday to Friday	05:00 - 00:00	07:00 – 10:00 & 16:00 – 19:00	3 -5 minutes (peak) 12-15 minutes (off-peak)
Saturday	06:30 - 00:00	11:00 – 20:00	3 -5 minutes (peak) 12-15 minutes (off-peak)
Sunday and Public Holidays	07:00 - 23:00	11:00 – 20:00	3 -5 minutes (peak) 12-15 minutes (off-peak)

Table 2.1: Operating Times & Frequency of the Red Line Luas

(Source: luas.ie, annotated by Thornton O'Connor Town Planning, 2023)

The Luas will be able to provide access for future students of the accommodation to various colleges across Dublin, only a few minutes' walk away from each Luas stop, such as; the National Ambulance Service College, TU Dublin, Inchicore College of Further Education, IBAT College Dublin, and The Gaiety School of Acting.

2.3.2 Bus Service

2.3.2.1 Existing Bus Service

There are various bus stops located in close proximity to the subject site, with the closest one being stop No. 1954, situated c. 150 metres walking distance east from the site, which is shown in Figure 2.7 below. The closest stop to provide access towards Dublin City is located c.500 metres walking distance west of the subject site, with the stop No. 4406. These stops serve Dublin City Bus Nos. 13, 68/A and 69. These bus routes can provide access for students of the proposed accommodation to multiple colleges across Dublin, such as: Griffith College, CCT College Dublin, Inchicore College of Further Education, The Gaiety School of Acting, IBAT College Dublin, Dorset College and DCU. There is another bus stop nearby, located c. 600 metres to the southwest of the subject site on Walkinstown Avenue. This bus stop serves Dublin City Bus No. 18, which can provide access to: Rathmines College of Further Education and Ballyfermot College of Further Education.

Figure 2.7: Proximity of the Closest Bus Stop to the Subject Site

(Source: Street View Google Maps, Annotated by Thornton O'Connor Town Planning, 2023)

The overall accessibility of the subject site, indicating the closest bus and Luas stops and relevant access roads, is shown in Figure 2.8 overleaf.

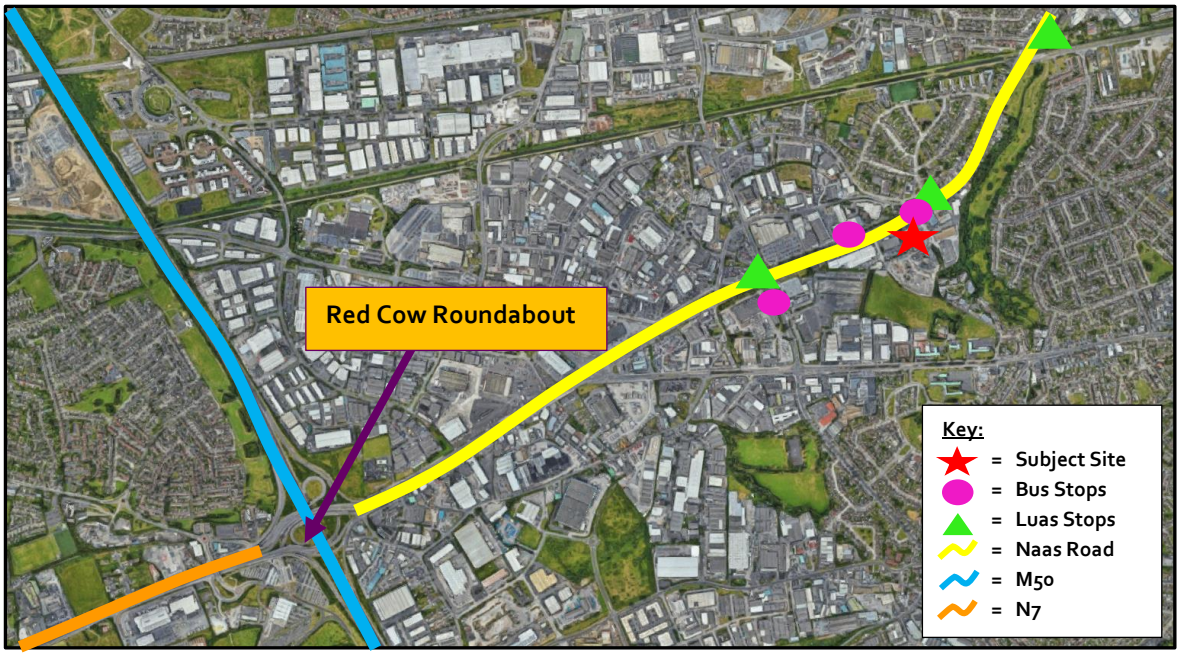

Figure 2.8: **Relevant Bus and Luas Stops, the M50, N7 and Naas Road and the Subject Site**

(Source: **Google Maps, Annotated by Thornton O'Connor Town Planning, 2023)**

2.3.2.2 Proposed BusConnects

BusConnects is a national program for investment in the bus network in cities across Ireland. As part of BusConnects Dublin, the bus network will be re-designed, and a more legible and accessible transport network created. A key principle underpinning this network is the notion of "Abundant Access" which is the idea that through simple connected and transfers between public transport services, more of the city should be accessible to passengers within a reasonable travel time. One such way in which this will be achieved is through the provision of local routes which will provide important connections within local areas, linking local retail centres and facilitating onward transport connections.

Under BusConnects, 'Orbital' and 'Other City Bound' routes are proposed to service in close proximity to the subject site on Naas Road, as shown in Figure 2.9 overleaf. The emerging route network in the vicinity of the subject site will notably enhance connectivity with the surrounding area and beyond.

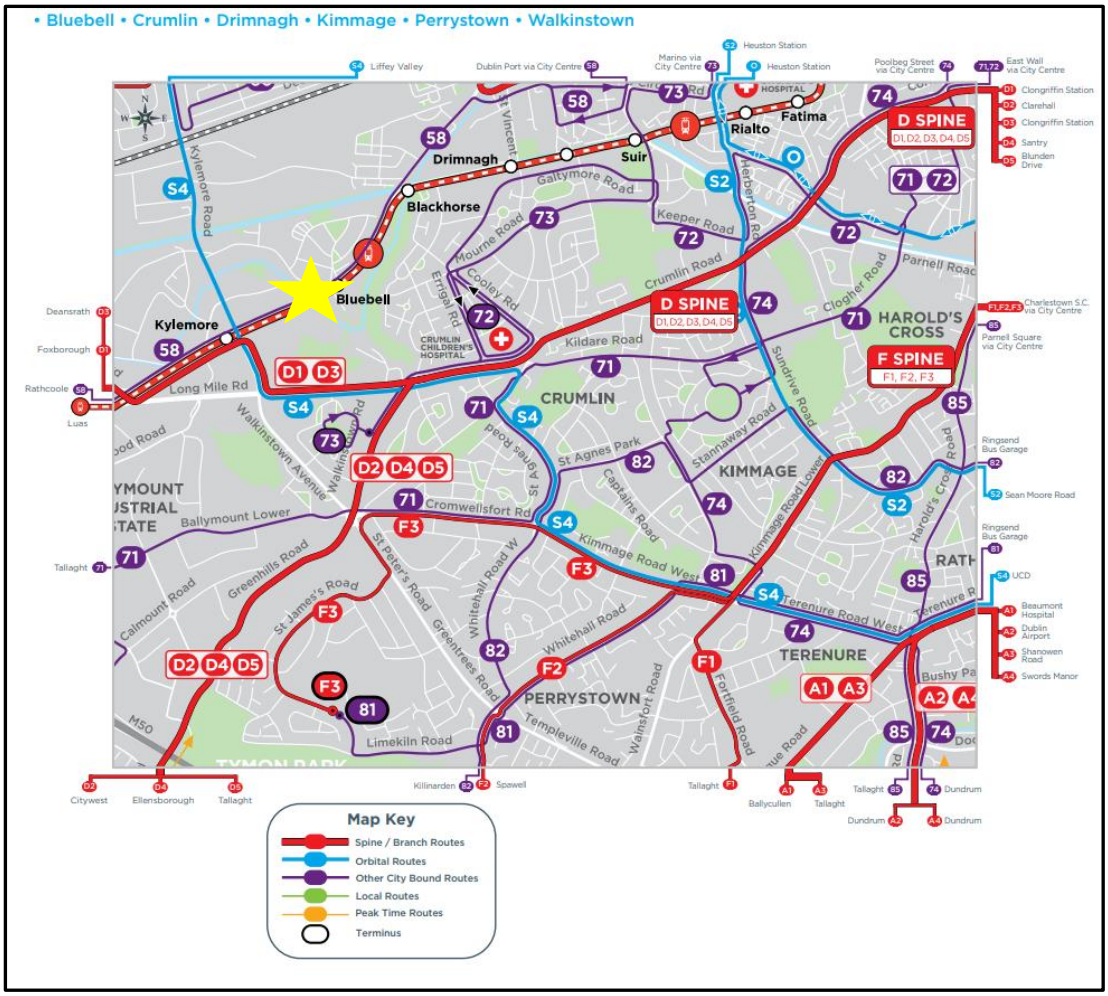

Figure 2.9: **Proposed BusConnects Routes with the Subject Site Identified by a Yellow Star**

(Source: **busconnects.ie, Annotated by Thornton O'Connor Town Planning, 2023)**

As illustrated in Figure 2.9 above and Table 2.2 below, the following proposed bus route is particularly relevant to the subject site.

Bus Route	Destination	Frequency
Other City Bound		
Route No. 58	Rathcoole – **City Centre** – Dublin Port	Every hour between 06:00 – 23:00 Monday to Saturday and every hour between 08:00 – 23:00
Orbital		
Route No. S4	Liffey Valley – Ballyfermot – Crumlin – Miltown – **UCD**	Once every 20 minutes between 05:00 - 06:00 and 23:00 – 00:00 and every 10 minutes between 06:00 – 23:00 during Monday to Friday, every 15 minutes on Saturday and every 10-20 minutes on Sunday.

Table 2.2: **Proposed BusConnects Routes and Frequency**

(Source: **busconnects.ie, Annotated by Thornton O'Connor Town Planning, 2023)**

As illustrated in Table 2.2 above, the proposed route No. S4 will be servicing University College Dublin with high frequency times for future students of the accommodation to use. The route goes through Kylemore Road and Walkinstown Avenue, both within a 5 – 10-minute walk from the subject site. The other route No. 58 will also be beneficial for future students to use as the bus route will be going through the City Centre with many Higher Education Institute's available.

3.0 RATIONALE FOR DEVELOPMENT

The Applicant, Malclose Limited, intends to develop a residential-led mixed-use development principally comprising 941 No. student accommodation bedspaces, ancillary communal spaces, cultural/community space, public open space which includes a newly daylit river and commercial floorspace in the form of a retail unit measuring 250 sq m.

3.1 National Demand for Student Accommodation

The proposed development will achieve one of the key action areas outlined in the report entitled *Rebuilding Ireland - Action Plan for Housing and Homelessness* (July 2016) ("*Rebuilding Ireland*") issued by the Minister for Housing, Planning, Community and Local Government in July 2016, namely to *'support greater provision of student accommodation'* which will help to ease the pressure on the private rental market.

Rebuilding Ireland is the Government's publication which recognises that a significant increase in new homes is needed to address the national housing crisis. In relation to student accommodation, *Rebuilding Ireland* notes that the student population is projected to grow by approximately 20,000 No. students (or 15%) to approximately 193,000 No. students by 2024. *Rebuilding Ireland* also notes that the *'Report on Student Accommodation: Demand and Supply'* (2015) by the Higher Education Authority estimates that there is an unmet demand of approximately 25,000 No. student bedspaces nationally and that this number will need to be met in order to keep up with the continuous demand for student accommodation resulting from the growth of the student population.

The Government of Ireland produced a report called '*Quarter 3 2019 Progress Report on the National Student Accommodation Strategy*' that illustrates the progress in the supply of student accommodation until near the end of 2019, with another updated report to be issued in 2024. The year-end 2017, national figures showed a total of c. 15,902 No. student bed spaces either completed or in the planning and development process. By the end of 2018 this figure had risen to 19,293 No. student bed spaces. By the end of Q3 2019 the total potential figure had risen to 23,649 No. student beds.

As detailed further is Section 6.0 below, the following is an extract from the National Student Accommodation Strategy report outlining the demand for student accommodation in 2019 and the projected supply and demand for purpose-built student accommodation's (PBSAs) in Dublin:

Current and Projected Supply and Demand

	Supply 2017	Demand 2017 (excess demand)	Supply 2019	Demand 2019 (excess demand)	Supply 2024	Demand 2024 (excess demand)
Dublin	12,432	30,298 (17,866)	18,142	35,913 (17,771)	28,806	42,375 (13,569)

** It should be noted that this table solely relates to PBSA and does not include figures for Student Accommodation Bed Spaces in Private Family Homes (Digs).*

It is thus clear that there is a massive unmet demand for student accommodation bedspaces.

Currently (as of August 2023) there are approximately just a total of c. 1,469 No. student bed spaces awaiting a decision under the current strategic housing development (SHD) applications as detailed in the table below.

ABP Ref.	Description of Development	Lodged Date	Location	Website	Decision Due by
313125	Demolition of existing buildings, construction of 593 No. student bedspaces and associated site works.	25/03/2022	Shanowen Business Centre and Kaybee House, Shanowen Road, Santry, Dublin 9	www.NestSHD.ie	14/07/2022
313205	Demolition of existing warehouse, a ten-year permission for the construction of 442 No. units (18 No. houses, 363 No. Build to Rent apartments and 189 No. student bedspaces), childcare facilities and associated site works.	04/04/2022	Canal Bank, PA Healy Road, Co. Limerick	www.canalbanklimerick.com	25/07/2022
313235	Demolition of existing building on site, construction of 221 No. student bedspaces and associated site works.	06/04/2022	The car sales premises currently known as Vector Motors (formerly known as Victor Motors), Goatstown Road, Dublin 14	www.goatstownroadshd2.ie	26/07/2022
314277	Demolition of existing site, 206 No. student bed spaces and associated site works.	05/08/2022	The Former Finbarr Galvin Motor Dealership, Fronting on to Victoria Cross Road and Orchard Road, Bishopston, Cork.	www.shdstudentvictoriacross.ie	24/11/2022
314337	Mixed-use residential development of 158 No. apartments (and ancillary facilities), 33 No. student accommodation units (260 No. bedspaces), creche (700 sq. m) and 2 No. retail units (329 sq. m)	11/08/2022	Mariavilla, Moyglare Road, Maynooth, Co. Kildare.	www.moyglareroadmaynoothshd.com	30/11/2022

Table 3.1: SHD Applications for Student Accommodation Awaiting Decision from An Bord Pleanála as of August 2023

(Source: 'Current Strategic Housing Development (SHD) applications' An Bord Pleanála and Thornton O'Connor Town Planning, 2023)

Setting aside these figures, it is evident that this is a huge undersupply of student accommodation across the Country.

In a research paper entitled '*Geographies of purpose built student accommodation: Exclusivity, precarity and (im)mobility*'[3], dated August 2020, the following is noted:

> "*A statement from the Union of Students in Ireland states: "On the night of the census in 2016, there were 429 students homeless in Ireland – making up 8% of the total homeless numbers. There are students effectively being locked out of college because they cannot find or afford suitable accommodation whilst they study." (USI, in O'Kelly, 2018).*"

One can reasonably assume that these numbers have increased since this research paper was published given the general significant increase in homelessness across society.

An article named '*Contesting the financialization of student accommodation: campaigns for the right to housing in Dublin, Ireland*'[4] published in January 2021 addresses the pressure that the private rental sector is facing in Dublin:

> "*A Higher Education Authority report, published in 2015, estimated a shortfall of 25,000 bed spaces for students, three-quarters of which exists in Dublin, resulting in significant pressure placed on the PRS*" [Private Rental Sector].

In an article entitled '*Student accommodation shortage 'the worst it has ever been'*"[5] by the Irish Examiner, published on 13th September 2022, the following was noted:

> "*While prices have been consistently rising, the lack of rooms available this year has been unprecedented, according to student union representatives.*
>
> *Nathan Murphy, Dublin City University (DCU) Students' Union vice president, said: "The current situation is probably one of the worst that we've ever seen. I'm getting countless emails and calls every single day from students who are unable to find accommodation or are looking at paying extraordinary amounts in rent.*
>
> *We knew it was going to be bad this year but I don't think anyone expected it to be this bad."*
>
> *Mr Murphy warned that some students are struggling to the point of being homeless, calling into his office to say they have nowhere to sleep, while others are resorting to commutes from as far as Cork and Galway, which can take up to seven hours out of their day.*
>
> *He said colleges across the country are handing out fliers, while DCU in particular is calling on alumni to house students due to the lack of accommodation available.*
>
> *UCD Students' Union president, Molly Greenough, describes the situation as an emergency, saying that Dublin in particular has reached its breaking point."*

[3] Geographies of purpose built student accommodation: Exclusivity, precarity and (im)mobility (wiley.com)
[4] Contesting the financialization of student accommodation: campaigns for the right to housing in Dublin, Ireland (tandfonline.com)
[5] https://www.irishexaminer.com/news/spotlight/arid40960706.html#:~:text=%E2%80%9CDemand%20for%20student%20accommodation%20is,the%20Covid%2D19%20pandemic.%E2%80%9D

In October 2022, protests were held at Trinity College Dublin in relation to the accommodation crisis currently being experienced by students in Ireland. Tens of thousands of students walked out of lectures on Thursday 13th October at campuses across Ireland as part of a National Day of Protest over an accommodation crisis and huge cost-of-living increases. Organised by the Union of Students in Ireland (USI), the protest was the biggest of its kind in recent years.

In an article entitled *'There's no college experience anymore': Students walk out of lectures to highlight cost of living crisis*[6], by the Irish Times, published on 13th October 2022, the following was noted:

> *"Thousands of college students across the State who walked out of lectures on Thursday in a protest organised by students' unions to highlight the cost of living and accommodation crisis facing young people. Students left lecture theatres at 11.11am and gathered in college squares, with signs such as "no keys, no degrees" and "students over profit"."*
>
> *"Eva Hunter, a third-year drama student from Slane, Co. Meath, said she wanted to live close to college this year but could not find a place to live.*
>
> > *"I've been looking with several groups of friends for ages. One place was €1,300 a month — but there's nothing out there for students, the options are gone. Even if I wanted to drive, it's €9 a day to park in Smithfield. So, I get the bus. It can take an hour and a half in traffic.*
> >
> > *Yesterday, I was up at 6.20am to get the bus in time for a 9am lecture. You're tired, finish at 6pm, and have to rush to get a bus, and you're home after 8pm," she said."*

The Independent released an article on 21st August 2023 titled '*As new academic year looms, universities are short of 30,000 beds for students'* [7]which addresses the severe shortage of student bedspaces in the country. The article states that:

> *"Universities have received almost 30,000 more applications than they have beds from students for on-campus in the upcoming academic year.*
>
> *With little or no availability in the private rented market, it points to a severe student accommodation crisis when the new college year gets under way next month."*

RTÉ released a recent online article on 18th August 2023 titled '*Lack of student accommodation causing 'anxiety and extreme worry"*[8]. The article expresses concerns raised by students who are heading into the new college year in September but are finding it difficult to find any appropriate accommodation. One student attending University College Cork stated that she is left with no other choice but to commute to college each day from Tralee to attend classes, equating to a six hour commute. Another student expressed major concerns as she is

[6] https://www.irishtimes.com/ireland/education/2022/10/13/theres-no-college-experience-any-more-studentswalk-out-of-lectures-to-highlight-cost-of-living-crisis/
[7] As new academic year looms, universities are short of 30,000 beds for students | Independent.ie
[8] Lack of student accommodation causing 'extreme worry' (rte.ie)

planning to move from Ukraine to study in Limerick. She is due to start college in the coming weeks, however:

> "*…. she sent over 20 emails on Daft.ie and then contacted another 40 people through the Mary Immaculate College accommodation office and someone got back to offer her accommodation but only for Monday to Friday.*"

The article concluded by stating the following:

> "*In terms of Ireland's current housing stock, the Department of Further and Higher education said there are 14,500 bed spaces owned by higher education institutions.*
>
> *That caters for around 5.8% of the Irish student population.*"

This article unequivocally demonstrates the harsh reality the student population are facing. With only a small percentage of student accommodation ran by third level institutions, most likely due to the shortage of funding by the state, it is clear that the private market must step in to accommodate these students in dire need of appropriate accommodation.

Therefore, it is clear that the proposed development providing 941 No. student accommodation bedspaces will contribute towards alleviating the current student accommodation crisis currently being experienced in Ireland.

3.2 Observations on Supply and Demand for Purpose-Built Student Accommodation in Dublin

3.2.1 Cushman & Wakefield – Ireland Student Accommodation Q3 2022

Cushman & Wakefield produced a report entitled '*Ireland Student Accommodation Q3 2022*' in February 2023[9] that deals with the PBSA market in Dublin. The demand for student accommodation is increasing drastically as the report states there has been a 2.1% increase in student numbers in the academic year 2021/2022. However, despite the positive increase in the number of people attending college, the report states:

> "*As of Q3 2022, just one scheme was under construction in the Dublin market, meaning stock will remain relatively unchanged in the short term. The volume of bed spaces in the pipeline, either via pre-planning, plans submitted, or plans granted, on paper points to more supply to come on stream, however the realities currently appear different with uses and viability coming under scrutiny. Several PBSA planning permissions are undergoing requests for new planning outside of PBSA, while others are expected to follow suit. It is therefore expected that there will be limited new builds commencing in the short to medium term.*"

The report estimates the number of students in 'Higher Education Institutes' (HEI's) who needed accommodation in Dublin during the 2021/2022 academic year:

> "*Looking further at the breakdown of students enrolled in HEI's located in Dublin, approximately 16,500 students are domiciled from greater than one hours commute to Dublin, along with 15,900 international students combined gives a conservative*

[9] https://www.cushmanwakefield.com/en/ireland/insights/ireland-student-accommodation-report

estimate of at least 32,400 students requiring accommodation in Dublin for the 2021/22 academic year."

With the continuation of significant demand for PBSA in Dublin, the stock available is evidently not enough to keep up with demand. As the number of students attending HEI's increases, the number of bedspaces made available is not. This is clear in the report as it demonstrates:

> "*Today's standing stock figure represents just a 3% increase since the end of 2021. In the nine months to end September 2022, just over 600 new beds were delivered to the market across two schemes in Dublin 8, Yugo's (formerly Uninest) Brewers Close accounting for 235 of these units and Nido's Ardee Point making up the remaining 368 units. This reflects a significant slowdown on the volume of new beds being delivered to the market. For example, in 2021, a total of 1,350 new bed spaces were added, equating to an 8% rise in stock. Furthermore, in 2018 and 2019 in excess of 2,000 new bed spaces were added each year, leading to stock increases between 17-20% annually.*
>
> *This pattern of decline is expected to continue over the short to medium term, as new starts have slowed substantially, and the pipeline becomes increasingly constrained."*

Overall, the Cushman & Wakefield report highlights the extensive pressure students attending HEI's are facing when it comes to finding PBSA. The struggle students face is down to the lack of submitted, approved or built-out pre-planning and planning applications for student accommodation.

3.2.2 EY – Social Economic and Land Use Study of the Impact of Purpose-Built Student Accommodation in Dublin City

The company EY prepared an analysis of the supply and demand of PBSA in Dublin City published in February 2019[10] for Dublin City Council, titled '*Social, Economic and Land Use Study of the Impact of Purpose Built Student Accommodation in Dublin City.*'

The analysis carried out by EY found that there were just c. 6,364 No. existing PBSA bedspaces in Dublin City Centre across 22 No. PBSA blocks within the two canals, primarily located in Dublin 1, Dublin 2, Dublin 7 and Dublin 8. It was also found that there were 2,676 No. bedspaces under construction in Dublin City Centre at the time of the survey and that "*by 2020, when the 298unit development at Aungier Street opens, there will be approximately 9,040 No. PBSA beds available for students studying in Dublin City Centre*.".

As outlined above, the *National Student Accommodation Strategy* (2020) identifies a requirement for at least 42,375 No. PBSA bedspaces in Dublin by 2024 to address the demand, therefore requiring in excess of 13,500 No. bedspaces.

However, as detailed in the EY Report, further analysis of the student population in Dublin suggests that the situation is actually even more grave:

> *"With low levels of rental opportunities in the Dublin market, and any improvement in supply in the coming years coming off a considerably low base, there is a requirement for alternative accommodation to be provided to cater for a growing student population.*

[10] https://assets.ey.com/content/dam/ey-sites/ey-com/en_ie/topics/transaction-advisory-services/ey-how-does-putting-purpose-at-the-centre-transform-programme-delivery.pdf

With projections of 42,375 students potentially requiring accommodation in Dublin in the next five years and a projected PBSA supply of 28,806 bed spaces by around 2023/24, including 14,000 bed spaces in the city centre based on the current pipeline, the evidence we have to date is it will be difficult for the PRS (standard housing) alone to meet this unmet demand of 13,569 bed spaces."

In addition, it was highlighted the pressure that private rental sectors would likely face if the supply of PBSA is not met:

"*Concerns regarding the PRS (standard housing) were raised by all stakeholders, who held the view that if further PBSA is not developed, students will be forced into an already pressurised PRS (standard housing). According to forecasts presented in this report the level of demand for student accommodation in Dublin is set to increase to between approximately 50,000 and 57,000 by 2025, a number unlikely to be met completely by the PRS (standard housing), given the issues in the sector. It is therefore imperative that demand is met with alternative options, including that provided by PBSA.*"

The EY Report explores the positive impacts of student accommodation in the city centre, noting that the regeneration impacts of PBSA in Dublin City Centre has played a positive key role in redeveloping and regeneration the inner city, stating:

"*A review of recent PBSA developments in Dublin City has found that these developments have resulted in benefits to the local environment, including the renewal of vacant and underutilised sites, the restoration and reuse of historic buildings and increased pedestrian linkages.*"

In addition, the report states 4 No. advantages for students renting in PBSA compared to the private rental sector:

"*i. Length of lease – the average lease in PBSA is approximately 37 to 41 weeks meaning the student only pays for accommodation during the academic year.*

ii. All-inclusive – the average rent per week covers all bills and facilities provided, including, for example, gyms; communal space; shared study space; cinema facilities etc.

iii. Quality – new PBSA developments must be completed to a standard set out by the local authority as compared to the variable quality, and age, of accommodation in the PRS (standard housing), such as pre 1963 properties.

iv. Accessibility – As observed in Section 3 of this report, ***PBSA is located in close proximity to*** *HEIs and / or* ***public transport options****.*" [Our Emphasis]

The EY Report concluded that:

"*At a national and city level a significant unmet requirement for PBSA, particularly in the city centre close to third-level institutions, was identified.*

These previously vacant sites in highly accessible locations were well suited for use by students attending a range of third-level institutions in the vicinity, and the combination of the significant demand for PBSA and availability of appropriate undeveloped sites

have resulted in developers now providing such PBSA. It is clear from available evidence, including the National Student Accommodation Strategy 2017, that such student demand will remain in the medium term until such time as supply of PBSA can meet demand. It would then be expected that the focus of developers generally will shift to alternative sectors, including private owner-occupier and build-to-rent residential development.

The PBSA sector is a necessary component of the residential stock of the city and it is apparent from the study undertaken that such PBSA has not forced out private residential development *in instances where the sites were already vacant and underutilised for a considerable number of years."* [Our Emphasis]

This Report was prepared in 2019 and we know from recent experience that the demand at this juncture for student bedspaces is critical. Dublin is expected to experience an above average population growth over the next twenty years. While not all of these will be students, the provision of an adequate supply of PBSA with ancillary amenities to specifically service the needs of the city's student population will to some extent at least alleviate pressure on Dublin's housing market and lead to a more sustainable use of resources. In this regard, the subject scheme which will take c. 21 months to construct, will contribute positively towards addressing the significant shortfall of PBSA in Dublin City, with the added benefit of alleviating pressure on the private rented sector.

3.3 Purpose Built Student Accommodation Precedents in London, UK

London in the UK has proved to be successful in providing PBSA for the student population, not only in proximity to third level institutions, but adjacent to frequent and high-quality public transport such as the London Underground (Tube) and bus services, the same as proposed at the subject site. There is an abundance of PBSA in Wembley, which is in northwest London, whereby the closest third level institution is the University of Westminster, as illustrated in Figure 3.1 below, which is 17 km away. The total journey time from the various student accommodations in Wembley to the University of Westminster takes between 25-28 No. minutes, depending on the location of the accommodation.

Referring to the 17km distance between the Wembley accommodation and the University of Westminster, we note that Tallaght TUD is some 9.8 km from the subject site, whilst Trinity College is 8.6 km both of which like the Wembley accommodation is easily accessible by a tram.

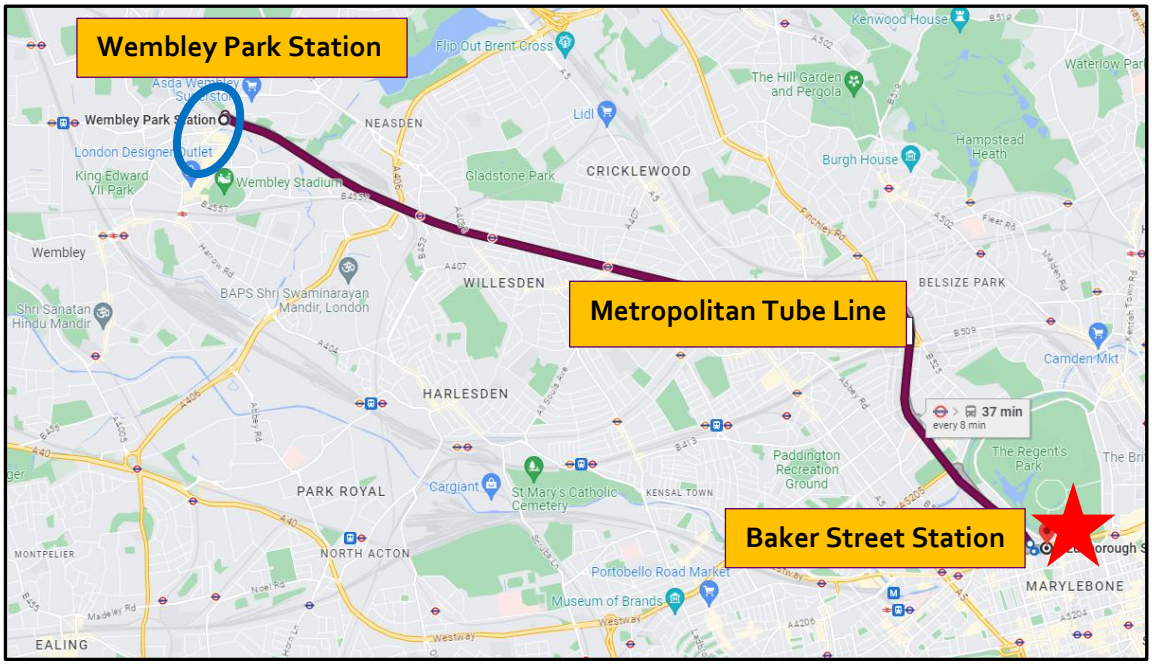

Figure 3.1: **Location of the Purpose-Built Student Accommodations in Wembley (Indicative Location Indicated by a Blue Circle) to the University of Westminster (Indicative Location Indicated by a Red Star)**

(Source: **Google Maps, Annotated by Thornton O'Connor Town Planning, 2023)**

Table 3.2 provides precedents of PBSA in London with similar journey times to third level institutions to that proposed at Gowan House.

Name	Location	Closest Third Level Institution	Closest Transport Option	Distance to Transport Option	Travel Time to Third Level Institution	Total Journey Time
Felda House, Host the Helix, Canvas Wembley, Scape Wembley, Grand Felda House, Unite Students – Olympic Way, Sterling Court, Pavilion Court, Unite Students – Arch View House	Wembley Park, Webley, London, HA9 0UU	University of Westminster – Marylebone Campus	Wembley Park Station – Metropolitan Tube Line	5-12-minute walk	14-minute tube journey to Baker Street Station and a 3-minute walk to third level institution	22-29-minutes
Unit Students – Angel Lane	Angel Lane, London, E15 1FF	University of East London – Docklands Campus	Stratford Station – Jubilee Tube Line	7-minute walk	5-minute tube journey to Canning Town Station, then a switchover to	24-28-minutes (depending on crossover

					the DLR. 9-minute DLR journey to Cyprus and a 2-minute walk to third level institution	time to second mode of transport)
Universal Student Living Academic House	128 Herne Hill, London, SE24 9QH	Learnforth University	Herne Hill Station (Stop N) – 201 No. bus route	3-minute walk	20-minute bus journey to Streatham Hill Station and a 10-minute walk to third level institution	33-minutes

Table 3.2: Purpose-Built Student Accommodation Precedents in London

(Source: Google Maps and Thornton O'Connor Town Planning, 2023)

3.4 Suitability of the Subject Site for the Proposed Student Accommodation Development

3.4.1 Zoning

The subject site is zoned 'Z14' in the *Dublin City Development Plan 2022-2028* ('*Development Plan*') where the stated objective is '*To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use.'* The subject site is also a designated a '*Strategic Development and Regeneration Area'* (SDRA5 -Naas Road) and is located within the City Edge Strategic Framework ('CESF'), as indicated in Figure 3.2.

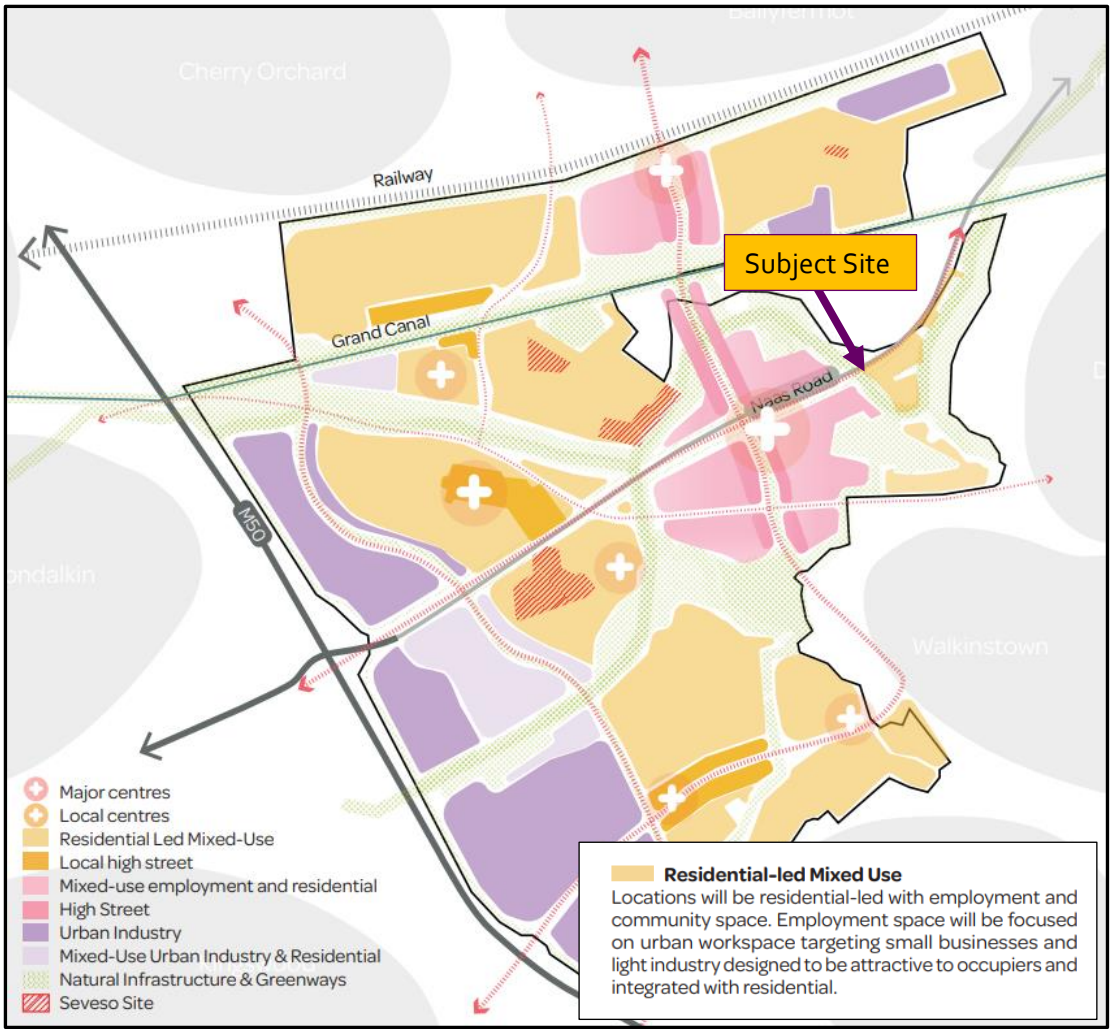

Figure 3.2: **Preferred Spatial Configuration with the Subject Site Identified as 'Residential-led Mixed Use'.**

(Source: ***City Edge Strategic Framework*** **(August 2022), Annotated by Thornton O'Connor Town Planning, 2023)**

Student Accommodation is listed as ***'permitted in principle'*** use in the *Development Plan* zoning for the site under '*Zoning Z14' and* thus it has been determined as a suitable location for student accommodation in the Development Plan. It is noted that Student Accommodation is only permitted in principle under 3 No. DCC zoning objective's, namely Z5 (City Centre), Z10 (inner Suburban) and Z14 (SDRAs) further demonstrating the acceptability of Student Accommodation in this location. However, this restricts the location of where such use can be located, limiting development in only 3 No. zones, with the subject site identified as one of them.

The provision of land-use zoning within the *Development Plan* and its list of permitted in principle uses in particular is intended to provide a degree of certainty and clarity for all interested parties in the planning process regarding future development. In this regard, we note that in the document entitled '*Development Plans- Guidelines for Planning Authorities'*, published in June 2022, the following is stated:

"The provision of land-use zoning within the development plan is intended to provide a degree of certainty and clarity to the community, landowners, developers and investors regarding future development."

The proposed use is acceptable in principle in this area given it is a 'permitted in principle' use in the *Development Plan* and it adheres to other relevant policies in the Development Plan such as it is located beside high quality public transport and there is not an over proliferation of student accommodation in the area.

3.4.2 Housing Crisis

As is well documented in the media and National Policy, Ireland is experiencing an acute housing crisis where the level of demand is significantly higher than housing supply which has had consequential impacts on the cost and availability of housing. As demonstrated extensively in Section 3.1 and 3.2 in this Report, there is a profound student accommodation supply shortfall in the country, with the demand exceptionally higher than the existing available stock. Students who cannot find accommodation have no other option but to commute to college each day, often resulting in travel times of up to 6 hours for a return trip, or having to stay on a friend's couch, or even having to defer the year. Students endure enough during the academic year trying to pass exams and projects and meeting certain deadlines, and with the added pressure of finding somewhere to live, students are left with an immense feeling of stress. It is considered that with Dublin comprising the most third level institutions in the country, the number of students finding it difficult to secure appropriate and affordable accommodation is exceptionally high.

The proposed development will unequivocally contribute positively towards addressing the national critical shortage in student accommodation supply and should free up private rented accommodation being utilised by students.

3.4.3 Location of the Subject Site to Third-Level Institutions

It is acknowledged that DCC have raised concerns in their Opinion regarding the 'remoteness' of the student accommodation to third-level education campuses and that the location of the subject site is not within "*walking distance of any university or college facilities and their related services & infrastructure"*. However, the CESF in which the subject site is located states the following:

> "*In line with guidance on Student Accommodation, purpose-built student accommodation should be provided on campuses* ***or in suitable locations which have convenient access to third level colleges****, especially by foot, bicycle and* ***high quality and convenient public transport****."* [Our Emphasis]

Figure 3.3 below illustrates the third level institutions that the CESF identifies to be in proximity to the City Edge lands.

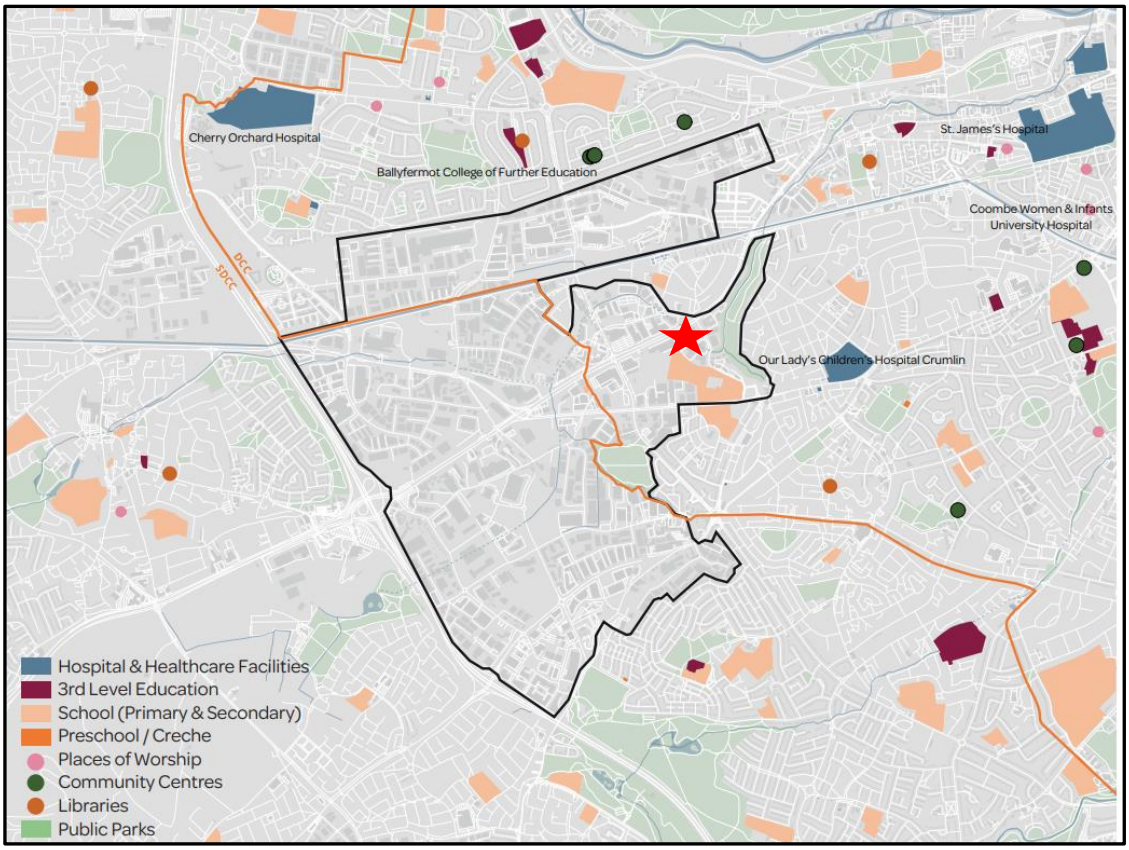

Figure 3.3: Location of Third Level Institutions in Proximity to City Edge Lands with the Indicative Location of the Subject Site Indicated by a Red Star

(Source: Figure 96 of the City Edge Strategic Framework, 2022, Annotated by Thornton O'Connor Town Planning 2023)

The preferred location of student accommodation is also stated in Policy QHSN45 of the *Development Plan* which supports the provision of student accommodation in locations that are serviced by a "*high quality and convenient public transport*". The intensification along high-quality public transport corridors and the provision of mix-use development in these areas are supported by Policy SMT 4 of the *Development Plan* "*to create attractive, liveable and high quality urban places*".

The site is located in a Central and/or Accessible Urban Location as defined in the *Apartment Guidelines, 2023* having regard to its location beside the Bluebell Luas stop.

> "***Such locations are generally suitable*** *for small-to large-scale (will vary subject to location) and* ***higher density development*** *(will also vary), that may wholly comprise apartments, including:*
>
> - *Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;*
> - ***Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and***
> - *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.*

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors."

As detailed extensively throughout this application, the subject site is located within 150 metres of the Bluebell Luas stop, and 150 metres from the closest bus stop, allowing easy access to higher education institutes from the City Edge lands and specifically the subject site. Section 2.3.1 and 2.3.2 of this Planning Report provides a summary of the various higher education institutes that are accessed via the Luas or various bus routes from the subject site. It is our opinion that the location of the proposed student accommodation is unequivocally within an urban location and beside the highest quality public transport.

The *Residential Travel Plan* by Barrett Mahony Consulting Engineers identifies the location of third level institutions that are easily accessed from the subject site via public transport. This is illustrated in Figure 3.4.

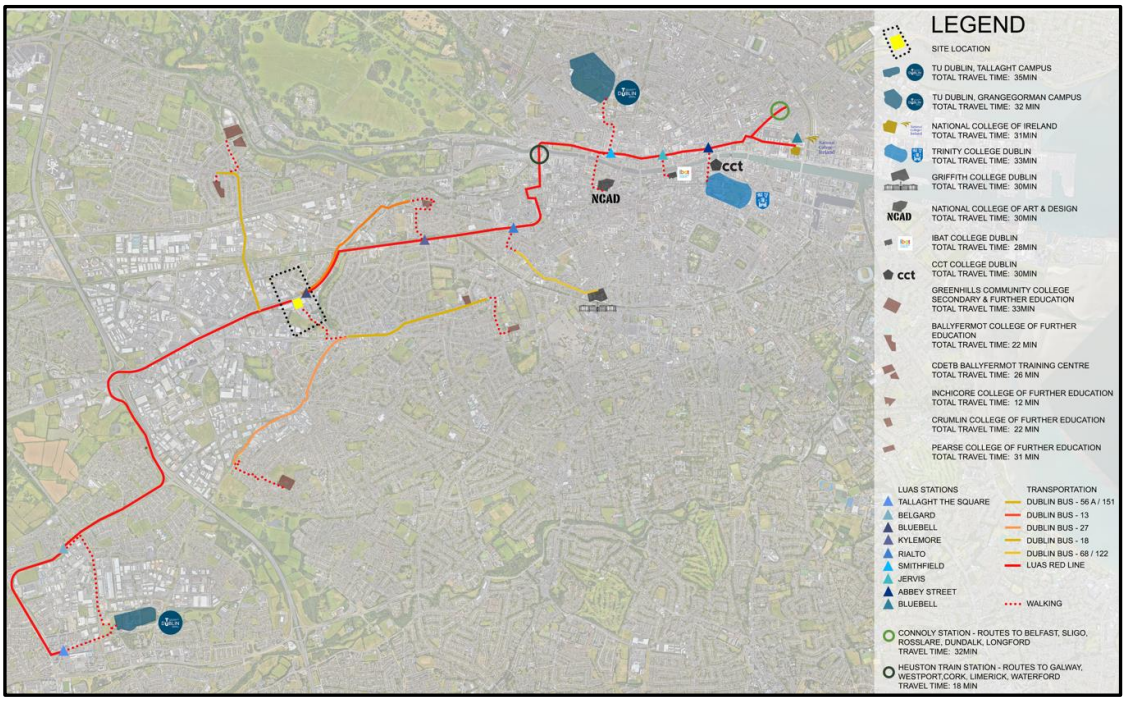

Figure 3.4: Travel Patterns from the Subject Site to Various Nearby Third Level Institutions, Including Routes & Times

(Source: Appendix 2 of the Residential Travel Plan by Barrett Mahony Consulting Engineers)

While the *Residential Travel Plan* highlights the location of third level institutions, the route taken, and the time it takes to get to each third level institution, the *Public Transport Demand Study* by Derry O'Leary illustrates the current and expected capacity of the Luas and bus routes serving the site as a result of the proposed development.

The Luas survey undertaken at the Bluebell stop indicated that:

- *"The service on offer was attractive in terms of frequency throughout the survey period.*
- *Loadings on the tram were somewhat low, possibly reflecting the work-from-home (WFH) patterns evident in recent times post pandemic.*

- *The significant tram capacity on offer means that actual capacity utilised was low at approximately 29%.*
- *All passengers had seats available to them, though a small number were still observed standing."*

The key bus stops surveyed included stop No. 4406, located directly opposite the site on Naas Road, No. 1954, located adjacent to and outside the subject site, and No. 2787 on the Kylemore Road. The bus survey concluded:

- "*The demand for bus services was a small share of overall public transport usage with tram loadings an order of magnitude higher.*
- *Both the supply of buses and passenger demand was well spread throughout the survey period.*
- *The peak period was not very pronounced with average loadings per bus never approaching even seated bus capacity.*
- *The average number of passengers per bus was low at 23 for the radial and orbital routes surveyed.*
- *While the % of bus seat capacity occupied was slightly higher than the tram equivalent, spare capacity was still excessive.*
- *The spread of the bus arrival times by route suggested that they seemed to operate very much to schedule throughout the survey period."*

In terms of the expected capacity on the Luas and bus routes, resultant from the proposed development, it was assumed that a 70% / 30% modal split between public transport and cycling by students would best analysis the future capacity. For the Luas it was concluded that:

> "*Excessive spare capacity of over 60% remains when the current demand is supplemented by the newly generated trips from the Gowan Motors site. On the basis of this analysis one can conclude that there is more than adequate spare capacity on the LUAS network at this point.*"

For the bus network it was concluded that:

> "*A total of 35 additional bus trips are anticipated in the am peak hour from the subject site. they are split evenly (18/17) across the 30-minute time bands. When added to the relatively small passenger numbers surveyed on buses at this point in the network they represent quite a material increase in bus patronage. Nevertheless, less than two-thirds of bus capacity is utilised in the busier of the two 30-minute periods. While more impactful on existing bus capacity than their LUAS equivalent the generated bus passengers are easily catered for by existing levels of bus service. It should be also be noted that the 20% extra capacity associated with a full bus, including standees, is also available to commuters.*
>
> *Under the assumption outlined in section 6.9 earlier all bus passengers are assumed to travel towards the city centre. We see that in this worst case scenario bus capacity is not under any threat. In practice, some students leaving the Gowan Motors site will take buses either outbound (away from the city centre) or travel on the orbital services within reach of the subject site. the likely demand, based on the volume of generated trips for the subject site outlined above, will be handled given the level of spare capacity on buses in this area.*"

The Report also takes into account the surrounding granted permissions for mixed-use residential developments (discussed in Section 4.2 of this Report) in combination with the expected capacity of the subject development:

> "*The examination of the combined adjacent site, together with the subject site, on LUAS loadings has the effect of increasing the capacity utilisation rate by roughly 6% in the peak. This still leaves spare capacity of the order of 55%*"

> "*The examination of the impact of the combined adjacent site, together with the subject site, on bus loadings has the effect of increasing the capacity utilisation rate materially in parts of the peak.* ***In the busier time band demand approaches seated bus capacity.*** *But total bus capacity, allowing for standees, is 20% higher. There is significant levels of spare capacity elsewhere in the peak. In practice, passenger loading will spread further throughout the peak and closer to equalisation over time as customers seek spare leaving capacity of the order of 35%-40%.*"

It is evident from both the *Residential Travel Plan* and the *Public Transport Capacity Report* that the subject site benefits from exceptional public transport options from the Luas Bluebell stop and nearby bus stops with various routes. These public transport options can provide access to various third level institutions while not putting significant pressure on the capacity of the Luas and bus network.

The location and accessibility of the subject site to various third level institutions will not only be beneficial for students, having been provided with appropriate accommodation, but the CESF states that the presence of third level education facilities within City Edge lands can influence third level education participation amongst the local population, which will increase future workforce in Dublin City:

> "*City Edge population generally falls below both State and wider Dublin City in terms of educational attainment (for e.g. at Upper Secondary and Third Levels). Provision of a greater range of employment opportunities in the area can help open up awareness of career opportunities and stimulate improved education achievement.*
>
> ***The presence of new education facilities can also increase engagement in education at both school and post-school ages****."*
>
> "*Proximity to third level institutions can provide a highly educated workforce, particularly to support new / emerging future sectors.*"

It is clear that the CESF recognises the proximity of third-level institutions to the City Edge lands. By providing student accommodation in proximity to Dublin City Centre, students will be exposed to a wide variety of future employment opportunities, as recognised by the CESF. It is evident that the benefits resultant of the proposed development would not only provide students a place to live but will also provide Dublin City businesses and companies a graduate workforce. The '*Regional Spatial & Economic Strategy*' supports third level institutions in the Eastern & Midlands Region as they help boost the economy by providing highly educated and skilled people:

> "*Access to high quality education and training has an important role to play in developing sustainable and balanced communities in the Region. Third level institutions and higher education providers in the Region are a critical enabler of economic development, providing continuing professional development, advanced research, and*

facilities to support business growth and clustering. Universities are also vital in providing higher order skills necessary to attract and retain major international companies."

It is evident that third level institutions play a major role in the economic development of the country therefore it is crucial that their students are provided with appropriate, high-quality and affordable accommodation to live in.

3.4.4 Housing Mix in the Local Area

The proposed development introduces Student Accommodation into the Naas Road/City Edge lands, providing a tenure diversity and mix, with the students bringing a different population cohort into the area, who can work in and utilise the commercial facilities provided in the subject application and the commercial/retail facilities in the surrounding granted permissions and wider area. We note that the analysis prepared by EY mentioned previously stated "*on average, PBSA residents spend €106 per week, not including rent and bills. Of this, €64 is reportedly spent in the local economy*".

The CESF makes specific reference to Student Accommodation stating that it "*will have a role to play in providing a mix of housing types"*. The mix of housing types in an area is also supported by Policy SC12 of the *Development Plan* which seeks "*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.*".

The surrounding area is characterised by a variety of uses. The subject lands are located within Carriglea Industrial Estate, which is surrounded by an agglomeration of business parks/industrial buildings albeit it is beginning to transform to a residential-led mixed use area. The development of student accommodation in the Naas Road SDRA will contribute to the transformation of this area which is already underway. The introduction of an alternative housing option will provide a diverse population cohort into the Naas Road regeneration area, providing a different housing typology to the significant quantum of apartment developments granted in the area.

By broadening the demographic and socio-economic profile of the area, it will introduce vibrancy and vitality to the area, and lead to increased cultural exchanges and interactions amongst residents. It will provide workers for the shops, café and gyms that will all form part of the transformed Naas Road area and will provide jobs for the students beside their accommodation to help fund their college experience. The increase in foot traffic in the area will contribute to enhanced security and safety, reducing the possibility of anti-social behaviour.

In order to provide the quantum of student accommodation bedspaces that the City needs, which is increasing year on year, we have to consider and evaluate suitable locations outside the City Centre.

We need to provide mixed-use communities outside the City Centre and create new urban neighbourhoods with a mix of uses and residential typologies. The provision of Student Accommodation can contribute significantly to this new urban neighbourhood that has commenced transformation from an industrial area to a residential led-mixed use neighbourhood envisaged in the now expired LAP and the CESF.

There is unlikely to be low rise housing in this regeneration area. Build-to-Rent and Co-Living is no longer permitted. Thus, without Student Accommodation, the only housing type or certainly the overwhelming majority will be apartments, creating a homogenous community as opposed to a vibrant thriving mixed-use area.

3.4.5 Facilities in the Local Area

The *Community and Social Audit* prepared by Thornton O'Connor Town Planning and submitted herewith identifies existing provision of social and community facilities within the local area (a 1.5 kilometre radius from the subject site). A summary of the findings is provided under the following headings:

Open Space and Recreation

> *"The Naas Road area is relatively well served by large scale sports and amenity facilities, with Walkinstown Park, Lansdowne Valley Park, Drimnagh Castle and the Grand Canal Green Route within the study area. There are also playing pitches and multi-sport facilities at Bluebell Centre and an Athletic Track and playing pitches at Bunting Road."*

> *"In total, 34 sports and recreation facilities were identified in and around the Study Area during the baseline survey which include 7 No. parks, 3 No. sports clubs, 4 No. playgrounds, and 20 No. gym and fitness enterprises."*

Social and Community Facilities

> *"The baseline study undertaken identified 23 No. community and faith services and facilities in and bordering the Study Area, including 3 No. post offices, 13 No. religious facilities, 4 No. youth and community centres, 2 No. banks/credit unions and 1 No. libraries."*

> *"There are two community centres within the study area (Bluebell and Walkinstown Community Centres) and a further two centres to the east. The community centres provide for a range of community activities including arts and cultural. There is one main library in Walkinstown and wider area is served by a mobile library service."*

> *"Although a range of community assets were identified as part of this audit, the consultation process emphasised the ongoing and continued demand for new and improved community infrastructure in the area. Participation in community activities contributes to social cohesion, reduces isolation and enriches the lives of residents. As such, community infrastructure is a key social asset, and audits such as this provide visibility on current assets, as well as potential gaps for the local area."*

Arts and Culture

> *"A lack of dedicated arts and cultural facilities were identified within the study area and its immediate vicinity."*

> *"This report submits that the social and community uses proposed as part of this planning application constitute an appropriate provision of this type of use for future residents, having regard for the existing provision identified in the survey area. The proposed uses will contribute to the health and wellbeing of the wider community."*

Retail Centres and Services

> "*Analysis of convenience retailing indicates that there is good provision of a range of supermarkets within the study area, with Lidl, Aldi, Supervalu and Tesco stores all located within 750m to 1.5 km of the site. The subject site is served by 2 No. larger retail centres 3 No. top up and day to day shopping centres within a 750 meters distance. A further 8 No. retail centres were identified within 1.5 km*".
>
> "*The nearby areas of Inchicore Village and Drimnagh Village both consist of a shopping parade with a large/small supermarket / grocery store with a range of supporting shops such as a butcher or chemist and retail services like hairdressers and post offices serving a small, localized catchment population.*
>
> *Drimnagh Village is located within walking distance of the subject site and the main street has many active store fronts offering services in: butchers, take-aways, café's, barbers and beauty salons, and small and large local convenience offerings (Aldi, Lidl, Mace, and Centra) that cater for the local area*."

It is evident from the *Community and Social Audit* that within a 1.5 kilometre radius from the subject site there is a plentiful supply of open space, recreation, and retail centre and services that students of the proposed development can utilise immediately. A possible increase of 941 No. people will use some of these facilities, further boosting the local economy and increasing community participation. It is noted that although there are a plentiful supply of retail services in proximity to the subject site, the proposed retail unit will provide students of the accommodation and surrounding residential developments granted permission with somewhere to shop for everyday goods.

The *Community and Social Audit* demonstrates that the local area lacks in cultural and community facilities and thus the proposed 729 sq m of cultural space, 512 sq m of community space, and 312 sq m of shared cultural and community space will "*offer the greatest net benefit to the community increasing participation and voluntary activity within the resident student population and the local community, while also encouraging local residents to recognise that such developments are positive for the regeneration of the community and locality*".

Finally the key point to note is that the transformation of the Naas Road LAP lands and the CESF lands is only commencing. As development progresses, there will be an increased quantum of services, facilities and amenities for the students and the general population of the new Naas Road lands.

3.4.6 Increase in Third Level Education Participation in the Local Area

Page 268 of the CESF proceeds to state the following:

> "*City Edge population generally falls below both State and wider Dublin City in terms of educational attainment (for e.g. at Upper Secondary and Third Levels). Provision of a greater range of employment opportunities in the area can help open up awareness of career opportunities and stimulate improved education achievement.*
>
> ***The presence of new education facilities can also increase engagement in education at both school and post-school ages***."

Similar to the presence of education facilities, the introduction of Student Accommodation into the area can have the same effect of encouraging greater participation in third-level education. The new residential developments granted permission in the surrounding area will include a range of unit sizes to facilitate young couples to growing families and through the effect of the visibility of students living and working in the immediate area, people may be encouraged to progress with further education.

3.5 Summary of Key Benefits of Providing Student Accommodation in this Location

The subject site is considered an ideal location for a PBSA building for a number of reasons:

- Student Accommodation has been deemed a 'permitted in principle' use in the Dublin City Development Plan 2022-2028.

- The site is located within 150 metres of the Bluebell Luas stop providing direct access for students to TU Dublin in Tallaght, the City Centre Campuses and further public transport options for campuses such as DCU and UCD. It has been clearly demonstrated in the public transport capacity study that there is adequate capacity on the red-line Luas and on local bus services to serve the proposed development.

- The accommodation's location would suit students in the proximate Ballyfermot Further Education campuses which is renowned in the Country for its media, music and radio courses, drawing students from all over the Country.

- The site is proximate to many Hospitals including notably St James' Hospital, Tallaght Hospital and Crumlin Children's Hospital. Thus, this will provide proximate accommodation for Student Nurses and Doctors who will be working in these facilities as part of their training.

- The CESF expressly supports the provision of Student Accommodation in this area as does the Dublin City Development Plan which expressly references sites beside high quality public transport as suitable for Student Accommodation.

- By providing accommodation outside the prime City Centre location, more affordable accommodation can be provided for students.

- There are no other Student Accommodation facilities around this area. Thus, the proposal will provide a mix of residential typologies and a diverse population into this new area, key for creating new organic communities.

It is clear that the subject development will be a positive addition to the area and will enhance legibility and activate the street frontage at the subject location. Having regard to both the urgent demand for student accommodation bedspaces in Dublin City, the location of the subject site to exceptional public transport, and the pattern of development in the surrounding area, which is undergoing intensive regeneration, it is considered that the subject development is an appropriate use for the site and can contribute significantly to the Naas Road and City Edge regeneration lands.

4.0 PLANNING HISTORY

Both the subject site and surrounding area have a detailed planning history.

4.1 Overview of Planning History of Subject Site

According to the Dublin City Council Online Planning Database, there has been six valid planning applications lodged at the subject site as detailed below, which relate to the existing use of the building and site and thus, they are not particularly relevant to the redevelopment proposal that is the subject of this planning application:

DCC Reg. Ref.	Applicant	Application Date	Development Description	Decision Date	Decision
0138/96	Gowan Distributors Limited	30th January 1996	Change of use from warehouse and office to office usage and additional internal two-storey offices.	14th May 1996	Split Decision (Permission & Refusal)
2269/96	Gowan Distributors Limited	11th November 1996	Two-storey ancillary offices within the existing building envelope with associated windows on the eastern elevation and an external boiler house.	18th December 1996	Grant Permission (Final Grant 6th Feb 1997)
0433/97	Gowan Distributors Limited	5th March 1997	Covered loading dock extension to the warehouse on the Naas Road facade, new two storey reception extension at the main entrance, new bicycle shed, relocation of existing compactor, associated alterations to the site layout and car parking.	1st May 1997	Grant Permission (Final Grant 18th June 1997)
4527/04	Gowan Distributors Limited	10th September 2004	Demolition of a canopy and loading area, change of use of part of warehouse to showroom with mezzanine storage over, construction of a two-storey extension comprising offices and showroom, a vehicular platform at the existing loading dock, associated signage, and external ventilation equipment, all at the north elevation of Gowan House and ancillary to the existing warehouse use.	3rd November 2004	Refuse Permission
6019/04	Gowan Distributors Limited	22nd December 2004	Demolition of a canopy and loading area, change of use of part of warehouse to showroom with mezzanine storage over, construction of a two-storey extension comprising offices and	22nd February 2005	Grant Permission (Final Grant 31st March 2005)

			showroom, a vehicular platform at the existing loading dock, associated signage and external ventilation equipment, all at the North elevation of Gowan House and ancillary to the existing warehouse use.		
6807/06	JC Decaux	21st December 2006	Public footpath on the southern side of the Naas Road, Dublin 12, located in front of Citroen Cars (Gowan House) and opposite the Eircom Business Systems Building (LAN Communications) A metropole double sided, internally illuminated advertisement structure comprising a display case mounted on an offset leg. The structure shall display civic information or an advertisement. The display panels shall be scrolling or static. The structure has an overall height of 4.85 metres and a width of 3.48 metres. The area of each of the display panels is 6.82msq.	29th March 2007	Grant Permission (Final Grant 8th May 2007)
WEB1624/23	JCDecaux Ireland Limited	26th July 2023	Retention planning application for the retention of the existing scrolling internally illuminated double sided 'Metropole' advertising display case mounted on an offset leg on the public footpath on the Southern side of the Naas Road, Dublin 12, in front of Gowan House	19th September 2023	Grant Retention Permission

4.2 Overview of Relevant Planning History of Proximate Sites

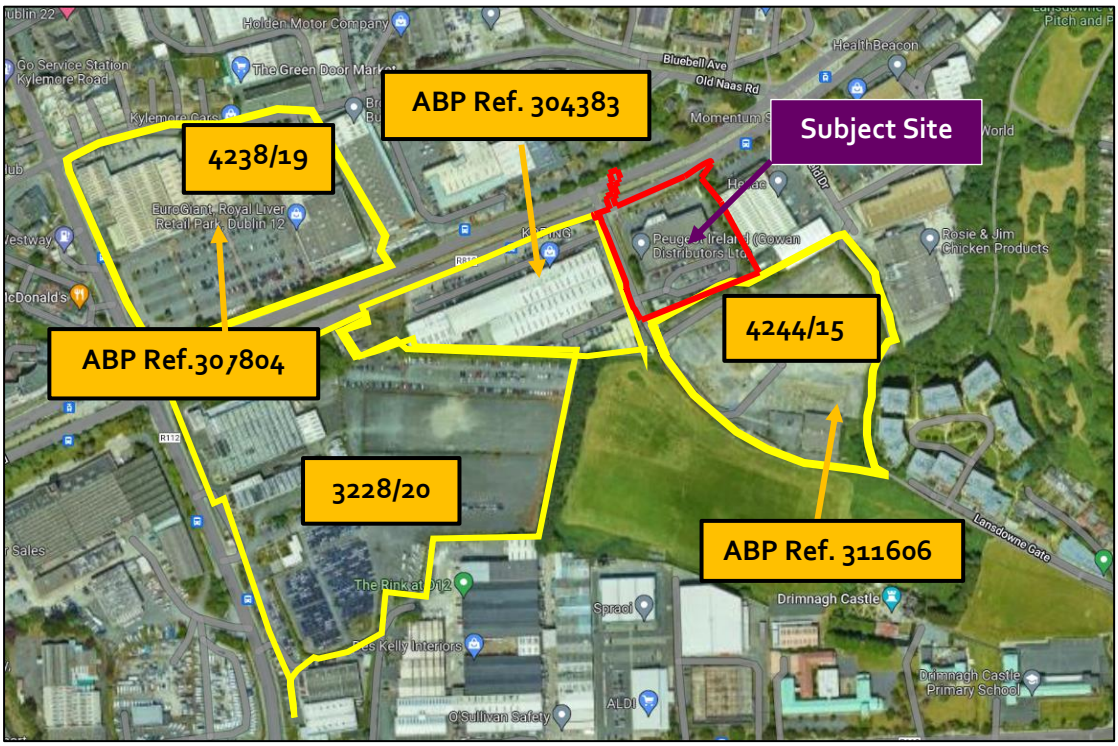

Figure 4.1: Locations of Mixed-Use Development Sites in the Vicinity, Application Site Indicatively Outlined in Red, Applications in the Vicinity Indicatively Outlined in Yellow

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2023)

4.2.1 Planning History to the Rear of the Subject Site- Mixed-Use Development at c.2.62 ha. at Carriglea Industrial Estate, Muirfield Drive, Naas Road, Dublin 12

Figure 4.2: Application Site Indicatively Outlined in Red and Carriglea Residential Site Indicatively Outlined in Yellow

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2023)

No.	DCC Reg. Ref.	Application Date	Development Description	Decision	Decision Date	Final Grant
1.	**4244/15** **Parent Application**	10th August 2016	The demolition of existing structures on site to provide for development (total GFA c. 37,255 sq m) comprising 340 No. residential units and crèche facility (c. 258 sq m) all in a development proposal of 8 No. blocks ranging in height from 4 - 5 storeys with associated basement level. The overall development shall also provide for 348 No. car parking spaces, plant room areas; water stores; bin stores; of public open space; of balcony/ terrace space; of communal open space; vehicular access and egress to the site via Muirfield Drive; and all associated site development, services, and landscape works.	Grant Permission	6th September 2016	17th October 2016
2.	**438/17**	11th May 2017	Amendments to previously permitted residential development, Reg. Ref. 4244/15. The proposed amendments comprise of; (i) the infill of Blocks A and C at 2nd to 6th floor level to form new residential Block AC; ii) increase the height from 5 No. storeys to 6 No. storeys with a 7 No.	Grant Permission	7th June 2017	14th July 2017

			storey element on the north-east corner of proposed Block AC..			
3.	**2875/17**	14th September 2017	Amendments to the residential development permitted under Reg. Ref.: 4244/15 to provide for an additional 56 No. increasing the total number of units from 283 No. to 339 No.	Grant Permission	11th October 2017	22nd November 2017
4.	**3940/17**	27th September 2017	Amendments to previously permitted residential development, Reg. Ref. 4244/15, and Reg. Ref. 2438/17 to increase heights of blocks to 7 No. storeys and the increase of units from 306 to 338 No. units.	Grant Permission	21st November 2017	8th January 2018
5.	**2176/18**	21st December 2018	Amendments to previously permitted residential development, Reg. Ref. 4244/15, as subsequently amended under Reg. Refs. 2438/17, 2875/17 and 3940/17. The proposed amendments comprise of: Reduction in the size and reconfiguration of the permitted basement, reduction in quantum of permitted residential car parking provision, amendments to permitted landscaping scheme; and All Associated site development works.	Grant Permission	24th January 2019	1st March 2019
6.	**2203/18**	21st December 2018	Amendments to previously permitted residential development, Reg. Ref. 4244/15, as subsequently amended under Reg. Refs. 2438/17, 2875/17 and 3940/17. Comprising a new design of permitted Block D, revised landscape plan, repositioning of blocks, changes to total proposed units from 358 no. as permitted to 355 No. as proposed.	Grant Permission	25th January 2019	5th March 2019
7.	**2319/18**	21st December 2018	Amendments to previously permitted residential development, Reg. Ref. 4244/15, as subsequently amended under Reg. Refs. 2438/17, 2875/17 and 3940/17. The proposed amendments comprise of: i) Provision of an additional setback floor on the north-east elevation of Block A increasing the height from 6 no. storeys as permitted to 7 no. storeys as proposed ii) Revised design and layout of permitted 4-storey Block B to provide for 16 no. units iii) Revised design, layout and position of west portion of permitted 7 storey Block C iv) Amendments to all elevations of Blocks A, B and C incorporating new	Grant Permission	25th January 2019	5th March 2019

			and revised balconies/ terraces generally on all floors; v) Revised hard and soft landscaping masterplan; and vi) All associated site development works and ancillary infrastructure and site services.			
8.	**2812/21**	21st May 2021	The development will consist of 1) the installation of solar photovoltaic ('PV') modules and heat pump units on the roof of apartment building Block AC and solar photovoltaic ('PV') modules on the roof of apartment building Block B on the site; 2) the construction of a single storey substation building adjacent to the eastern boundary of the site to the east of apartment building Block F and the north of apartment building Block G and; 3) the construction of a louvered generator enclosure adjacent to the all-weather multi games area in the eastern part of the site to the south east of apartment buildings Block AC and Block B.	Grant Permission	21st May 2021	20th August 2021
9.	**3628/21**	4th October 2021	The development will consist of the construction of a resident's car park for a temporary period of two years comprising 58 No. parking spaces including 4 No. disabled spaces accessed from the internal road from Muirfield Drive and all associated site development works including {1.8 metre high) perimeter fencing, lighting and pedestrian footpaths.	Grant Permission	26th November 2021	13th January 2022

Under the parent application DCC Reg. Ref. 4244/15, permission was sought for the demolition of existing structures on site to provide for development (c. 37,255 sq m) comprising 340 No. residential units and crèche facility (c. 258 sq m) all in a development proposal of 8 No. blocks ranging in height from 4 - 5 No. storeys at a site at Carriglea Industrial Estate, Naas Road.

Regarding building heights proposed, the Planning Officer in their Planners Report stated:

> *'Section 17.6.1 of the development plan identifies appropriate heights for buildings. It states that in outer city areas 4 storeys would be the appropriate height for residential development, with the proviso that* ***within 500m of transport routes*** *such as DART, 6 storeys would be considered.* ***Given the proximity of the Bluebell Luas Stop to the site, and the height of the adjacent Lansdowne Gate development, it is considered that there is potential to increase above the 4-storey limit.*** *However, in the context of the uniform heights of the blocks as currently proposed, their close juxta positioning, and the impact on light penetration into the open spaces and the apartments provided, it is considered that the cumulative impact would be seriously injurious to the amenities*

of the future residents and the users of the linear park. It is considered that the uniformity of the heights, the lengths of three of the blocks and the roofscape itself should be revised.' [Our Emphasis]

Figure 4.3: Proposed Site Plan for the Carriglea Site

(Source: Extract from Parent Permission DCC Reg. Ref. 4244/15, annotated by Thornton O'Connor Town Planning, 2023)

A Final Grant of Permission was issued for the scheme by Dublin County Council on the 17th October 2017.

The primary amendments made to the development after the Final Grant of the parent permission were mainly concerned with increasing the building blocks heights to a maximum height of 7 No. storeys and increasing the overall residential density of the scheme, as well as dealing with the fact that the culvert was not in the location originally thought.

The Planning Officer in their Planning Report under application Reg. Ref. 3940/17 states:

> *The primary amendment to this current permission is in relation to the heights proposed. Under the 2016-2022 City Development Plan development within 500m of a Luas stop can achieve building heights of up to 24m. This site is located within 200m of the Bluebell Luas stop.* ***The heights proposed will conform with the height strategy of the Development Plan and will increase the density of development on the site****.'*

Regarding compliance with building heights proposed in the Naas Road Lands Local Area Plan at the time, the Planning Officer in their Planning Report under application Reg. Ref. 3940/17 states:

> *'Under section 15.1.1.5 of the Dublin City Development Plan, the SDRA5 is indicated as producing 500 dwelling units (approx.). The proposed height for the site is not specified in the LAP but the height designation refers to Development Plan height standards.* ***The maximum Development Plan height allowable at this location is considered low rise and is 24 metres. The proposed development would rise to 24 metres (approx.), there is no prohibition of development of this height on this site.'***

The scheme at this site is currently under construction. The last amendment application made to the scheme was under DCC Reg. Ref. 3628/21 for the construction of a resident's car park and all associated site development works, and was issued a Final Grant by Dublin City Council on 13th January 2022.

Figure 4.4 shows the latest layout of the scheme.

Figure 4.4: Proposed Site Plan for the Carriglea Site

Source: Extract from Parent Permission DCC Reg. Ref. 2319/18, annotated by Thornton O'Connor Town Planning, 2022

In this 2018 application, the following was stated in respect of the route of the river, noting the culvert didn't lie on the original route of the river. As a result, the permitted basements had to be relocated to accommodate the route of the culvert and provide a 3-metre setback from the culvert.

The permitted Carriglea scheme has been designed around a buried river – The Camac (also known as 'Cammock') – with a central linear park set out along the former route of this river. Dublin City Council (DCC) records had indicated that a culvert of the river lay in this location and after carrying our further ground survey work which appeared to validate the Council's records. The applicants configured their residential layout around this feature and provided a linear water feature similar the river as part of the scheme landscaping.

On commencement of enabling works on the site in recent months, post demolition ground radar and physical inspection surveys carried out by Lenmar and Ground Investigations Ireland identified that the culvert did not lie on the original route of the river, but it was not evident that the river had been diverted into a culvert that was built running parallel to the river. Excavation trenches were completed during site clearance works and located the crown of the culvert.

Following confirmation of location of the culvert, Marlet alerted DCC Drainage Department to the issue and OCSC Engineers met with Sally Reddington and Maria Tracey of the DCC Department on the 25th October 2017 to discuss the implications of the culvert on the permitted scheme design. The discussion focused on options for a feasible design solution and DCC instructed OCSC that the affected blocks and basement must be repositioned to accommodate the route of the culvert and to ensure an adequate 3m setback is maintained from the culvert. The amended basement and block arrangement takes cognisance of the requirements of DCC Drainage Department, balancing them against other existing site infrastructure constraints which are set out in Figure 9 below. It should also be noted that is not possible to move the footprint of Blocks H, J, K, L or G nearer to the southern/ western boundary because of the presence of a trunk sewer.

The impact of the Camac culvert on the permitted scheme is as shown in Figures 5 and 6 below. A redesign of the permitted basement and affected Blocks D and E is required to avoid the culvert. The redesigned scheme as proposed is illustrated by Figures 7 and 8 below.

4.2.2 ABP Ref. 311606: Strategic Housing Development at Carriglea Industrial Estate, Muirfield Drive, Naas Road (www.carrigleashdnaasroad.ie) - Residential SHD Application at the Site at Carriglea Site

ABP Reg. Ref.	**311606**
ABP Case Ref.	TA29S.311606
Location	Carriglea Industrial Estate, Muirfield Drive, Naas Road, Dublin 12
Applicant	Golden Port Estates Limited
Application Date	8th October 2021
Development Description	249 No. apartments and associated site works comprising five to ten-storey buildings are being proposed, including a maximum building height of 26m
ABP Decision	Grant Permission subject to 26 No. conditions
Final Grant	6th April 2021

Under ABP Ref. 311606, a Strategic Housing Development (SHD) lodged on 8th October 2021, with permission sought for the development of 249 No. apartments and associated site works at the western portion of the Carriglea Industrial Estate site, Muirfield Drive, Naas Road, Dublin 12. The site is outlined in red below.

The maximum height proposed was 10 No. storeys or 26 No. metres.

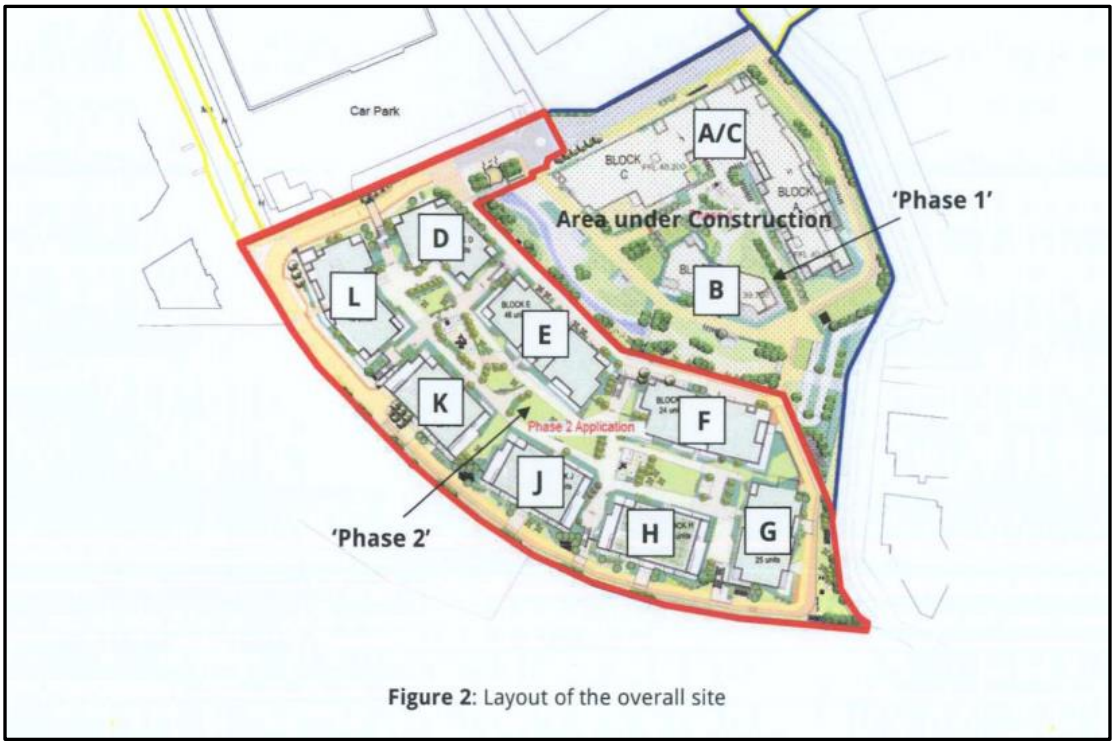

Figure 4.5: **Site Layout (Phase 2) of Residential SHD Application at the Carriglea Site**

Source: **(www.carrigleashdnaasroad.ie)**

Figure 4.6: **CGI of the Proposed (Phase 2) Residential SHD Application at the Carriglea Site**

(Source: **Extract from Road (www.carrigleashdnaasroad.ie))**

Regarding proposed heights of the buildings, the Planning Inspector stated:

> '*Five to ten-storey buildings are being proposed,* ***including a maximum building height of 26m, compared with the 24m Development Plan building height restriction****;*

The site is capable of accommodating additional building height without compromising residential amenities and the subject proposals would provide for a well-considered redevelopment of a vacant brownfield urban infill site that is close to public transport services and local amenities*;*

The proposed building heights are permissible having regard to ***national policy, including Specific Planning Policy Requirements (SPPRs) of the Urban Development and Building Heights, Guidelines for Planning Authorities (2018) (hereinafter the 'Building Heights Guidelines'),*** *which mandate for increased building heights in suitable locations to provide an appropriate density for infill sites that are well serviced by public transport services and local amenities.*

Given the context of the proposed development and the location of the subject site adjacent to quality public transport services, ***it is considered that the proposed development is capable of achieving building heights greater than the Development Plan standards.*** *Consequently, in combination with the planning history, as well as national and local planning policy, the proposed building heights would be appropriate for the site.'* [Our Emphasis]

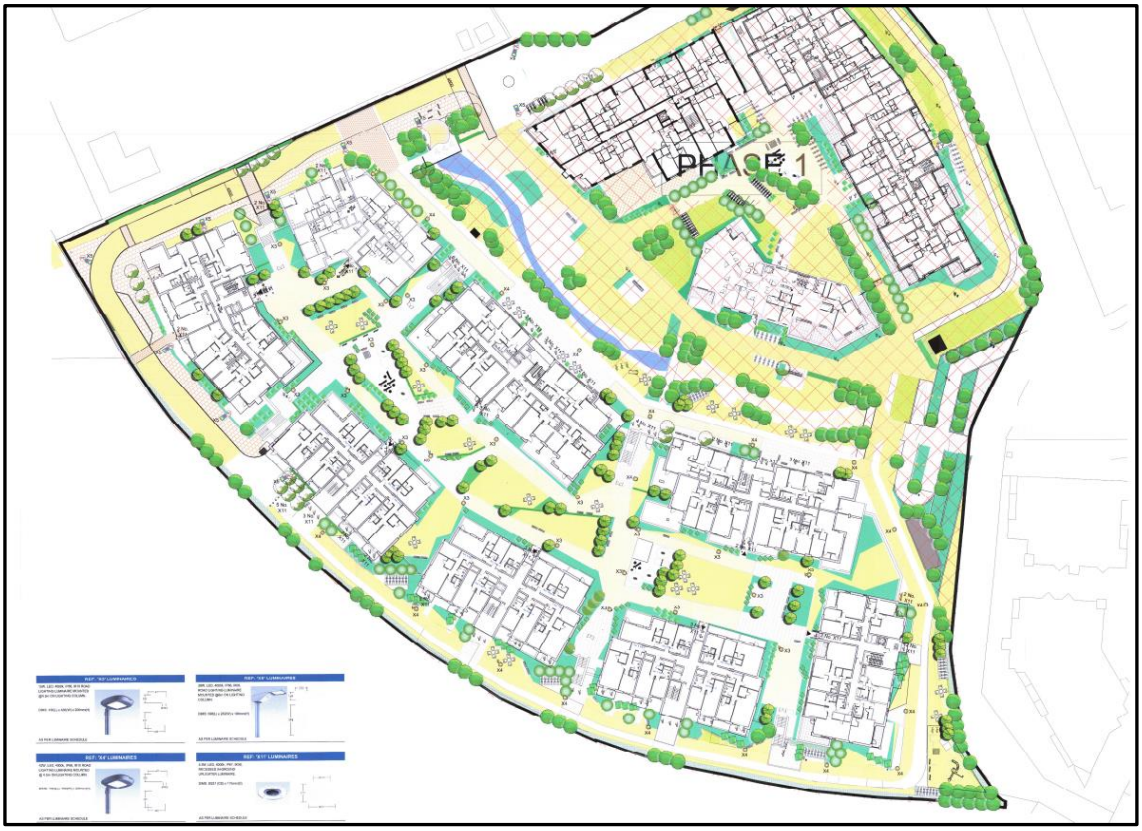

Figure 4.7: Permitted (Phase 2) Application at the Carriglea Site

(Source: Extract from ABP. Ref. 311606)

The Planning Inspector concluded:

'The Board considers that, while a grant of permission for the proposed Strategic Housing Development ***would not materially contravene a zoning objective of the statutory plan for the area, it would materially contravene the Dublin City***

Development Plan 2016-2022 in relation to building heights. *The Board considers that, having regard to the provisions of* ***section 37(2) of the Planning and Development Act 2000****, as amended, the grant of permission, in material contravention of the Dublin City Development Plan 2016-2022, would be justified for the following reasons and consideration.*

- *The proposed development* ***is considered to be of strategic or national importance by reason of its potential to contribute to the achievement of the Government's policy to increase the delivery of housing*** *set out in Rebuilding Ireland – Action Plan for Housing and Homelessness issued in July 2016 and to facilitate the achievement of greater density and height in residential development in an urban area close to public transport and centres of employment. Accordingly, the provisions set out under section 37(2)(b)(i) are applicable;*

- *It is considered that permission for the proposed development should be granted having regard to Government policies, as set out in the* ***National Planning Framework, in particular objectives 13 and 35, and the application of Specific Planning Policy Requirement 3(a) of the Urban Development and Building Heights Guidelines for Planning Authorities (2018).*** *Accordingly, the provisions set out under section 37(2)(b)(iii) are applicable.*

- ***The Board has previously approved a 24.2m high building (ABP-304383-19) and 18.9m to 77.8m high buildings (ABP-307804-20) on sites adjoining and 250m respectively to the northwest of the application site****. The proposed development is continuing on that pattern of permitted development, as well as the pattern of existing development on the adjoining associated phase 1 Carriglea Industrial Estate lands and in the adjacent Lansdowne Gate apartment development. Accordingly, the provisions set out under section 37(2)(b)(iv) are applicable with respect to the proposed building heights.'*

A Final Grant was issued by the Board on 6th April 2021 subject to 26 No. conditions and this SHD application has commenced construction.

4.2.3. Planning History of Vicinity –DCC Reg. Ref. 3228/20 – Mixed-Use Development at Site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road

DCC Reg. Ref	**3228/20**
Location	Site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road
Applicant	O' Flynn Construction Co. Unlimited Company
Application Date	17th December 2020
Development Description	a 10-year permission for a mixed-use including part Build to Rent development in 13 no. blocks (Blocks A-L) ranging in height from 4-15 storeys over 3 no. basements with a cumulative gross floor area of 168,184.13 sq.m at this 6.921 hectare site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road. The application area includes part of the 'Nissan Site' (6.429 hectares) and

	0.492 hectares to accommodate works to facilitate connections to municipal services and works proposed to public roads.
Decision	Grant Permission subject to 27 No. conditions
Decision Date	19th February 2021
Final Grant	6th April 2021

Under the application DCC Reg. Ref. 3228/20, lodged on the 17th December 2020, permission was sought for the demolition of existing structures on site to provide a mixed use including part Build to Rent development in 13 no. blocks (Blocks A-L) ranging in height from 4-15 No. storeys over 3 No. basements with a cumulative gross floor area of 168,184.13 sq m at a c. 6.921 hectare site to the east of Walkinstown Avenue at the junction of Walkinstown Avenue and Naas Road, Dublin 12.

The site is located within the boundary of the Naas Road LAP 2013 (extended until 2023) and is designated as a Key District Centre, Level 3 as set out in the Retail Strategy for the Greater Dublin Area 2008-2016 and located within the boundary of a Key District Centre (KDC 6) Naas Road and forms part of proposed Gateway to the City as identified *in Section 4.5.2 Inner Suburbs and Outer City as Part of the Metropolitan Area*, which states that '*gateway locations create an opportunity to strengthen the city's visual identity and signal the entrance to the city, and so are ideal locations for high quality landmark building, structures and civic spaces*.'

Figure 4.8: Application Site Indicatively Outlined in Yellow, Subject Site in Vicinity indicated by Red Star

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2023)

Figure 4.9: CGI of the Proposed Development

(Source: Extract from DCC Reg. Ref. 3228/20)

Regarding the Proposed height of up to 15 No. storeys fronting Naas Road, the Planning Officer stated in their report that:

> *'The tallest building is Block A – the hotel, which is 15 storeys and is located at the junction of the Naas Road and Walkinstown Avenue and forms a landmark for the development. The overall height of this structure is 53.4 metres. It is noted that heights of up to 50 metres are indicated in the City Plan, however, the applicants have justified this additional height in terms of the criteria as set out in Urban Development and Building Height Guidelines for Planning Authorities, 2018.*
>
> *The overall heights proposed have been assessed against relevant national and local policy and it is therefore considered that the overall heights as proposed are acceptable when considered against the criteria as set out in Urban Development and Building Height Guidelines for Planning Authorities, 2018.'*

Figure 4.10: Elevation Section 1 of the Proposed Scheme Fronting Naas Road

(Source: Extract from DCC Reg. Ref. 3228/20)

A Final Grant of permission was issued for the scheme on 6th April 2021, subject to 27 No. conditions.

It is noted that an amendment application has just been lodged to DCC on 19th May 2023 under Planning Application Reg. Ref. 3792/23.

4.2.4 Planning History of Vicinity – ABP Ref.307804- DCC Reg. Ref. 4238/19- Mixed-Use Residential Development at Royal Liver Assurance Retail Park, Old Naas Road, Dublin 12

ABP Ref.	**307804**
ABP Case Ref.	**PL29S.307804**
DCC Reg. Ref	**4238/19**
Location	Royal Liver Assurance Retail Park, Old Naas Road, Dublin 12. The site is bounded by Kylemore Road (R112) to the west; Old Naas Road to the north; Naas Road (R810) to the south; and "Brooks" (Building Providers) to the east
Applicant	Shorevale Investments Limited
Application Date	26th March 2020
Development Description	The proposed development will comprise the demolition of all structures on site and the construction of a mixed-use development, c. 129,210m2 GFA (plus c. 38,399m2 relating to ancillary car parking, bicycle parking, plant, waste storage facilities, storage, services, including at ground (sub-podium) and basement levels); comprising residential, office, crèche, community, retail, café /bar / restaurant, medical centre, pharmacy uses. The project will comprise: 1,102 No. residential units comprising: o 992 No. Build-to-Rent apartments units with resident support facilities, services and amenities at ground and upper floor levels; 110 No. apartments; 203 No. Build-to-Rent Shared Accommodation Single Occupancy Bedrooms, within a single Block, with communal kitchen / dining / living facilities to serve the residents at basement to 9th floor levels; 1 No. office building (18 storeys) over

	basement to provide office use (c.17,002m2). 1 No. Retail unit (c.2,360m2); With 4 No. café / bar / restaurant units.
Decision	Grant Permission subject to 25 No. conditions
Decision Date	9th July 2020
Appeal Date	26th March 2020
Appeal Decision	Grant Permission subject to 21 No. conditions
Final Grant	19th November 2020

Under the application DCC Reg. Ref. 4238/19, lodged on the 26th March 2020, permission was sought for the demolition of existing structures on site to provide for development of 1,102 No. residential units comprising: 992 No. Build-to-Rent apartments units with resident support facilities, services and amenities at ground and upper floor levels; 110 No. apartments; 203 No. Build-to-Rent Shared Accommodation Single Occupancy Bedrooms, within a single Block, with communal kitchen / dining / living facilities to serve the residents at basement to 9th floor levels; 1 No. office building (18 storeys) over basement to provide office use' 1 No. Retail unit (c.2,360m2); with 4 No. café / bar / restaurant units.at a site at Royal Liver Assurance Retail Park, Old Naas Road, Dublin 12.

Regarding building heights proposed, the Planning Officer in their Planners Report stated:

> *'The proposed development is a **substantial underutilised site in the City.** It is therefore considered that the subject site is well served by public transport and access to all the amenities which the city centre has to offer. The need to densify the City, through the reuse of this such sites, particularly those well served by public transport is a key principle of the NPF and both the City Plan and the Building Height guidelines. The proposed development accords with national policy/guidance, which seeks to secure compact growth in urban areas and deliver higher densities in suitable locations. The proposal will deliver **a high-density development in a strategic location close to major transport infrastructure enabling the city 'to accommodate a greater proportion of its growth within its metropolitan boundaries through regeneration and redevelopment projects' (National Strategic Outcome 1) and 'encourage more people and generated more jobs and activity within the city' (National Policy Objective 11).** In delivering buildings of significant height, it acknowledges the role that height has to play in the delivery of more compact growth consistent with the recently published 'Urban Development and Building Height-Guidelines for Planning Authorities'* [Our Emphasis]

Figure 4.11: **Application Site Indicatively Outlined in Yellow, Subject Site in Vicinity indicated by Red Star**

(Source: **Google Maps, annotated by Thornton O'Connor Town Planning, 2023)**

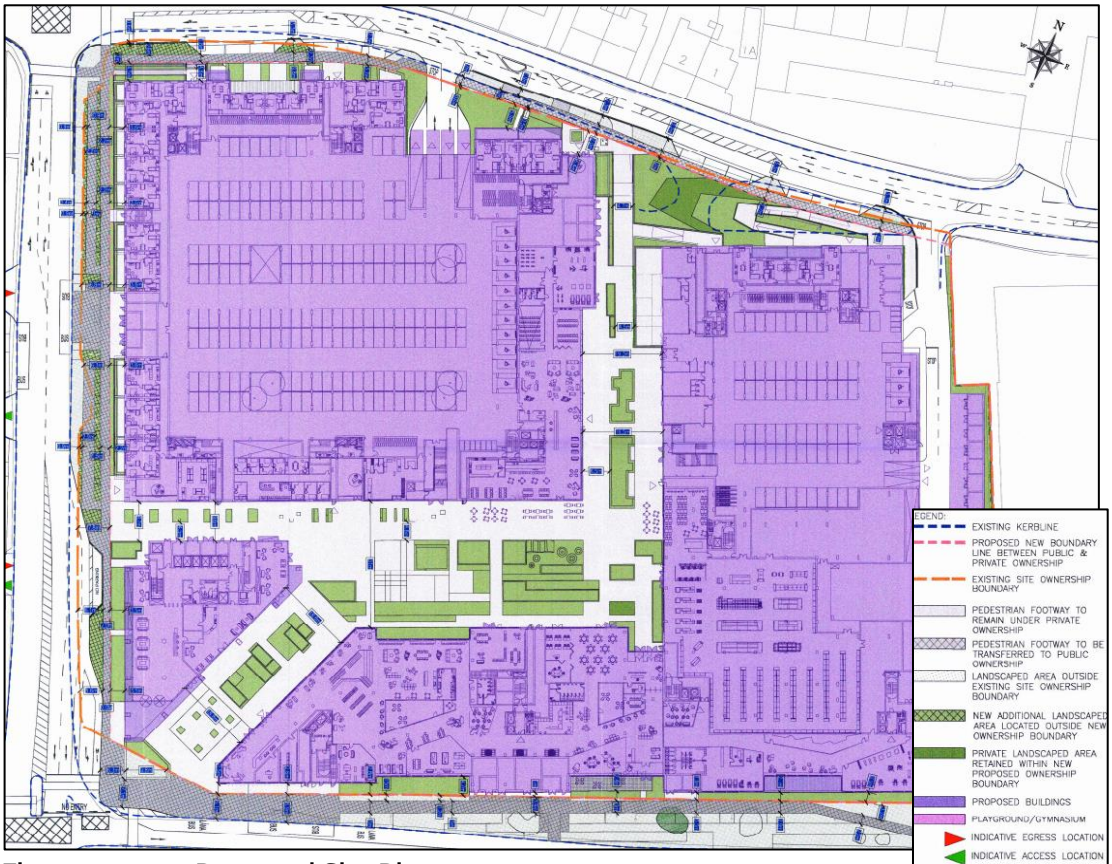

Figure 4.12: **Proposed Site Plan**

(Source: **Extract from DCC Reg. Ref. 4238/19, annotated by Thornton O'Connor Town Planning, 2023)**

Figure 4.13: CGI of the Proposed Development

(Source: Extract from DCC Reg. Ref. 4238/19, annotated by Thornton O'Connor Town Planning, 2023)

The decision to grant permission subject to 25 No. conditions by Dublin City Council on 9th July 2020 was subject to a third-party Appeal to An Bord Pleanála on 5th August 2020.

The Planning Inspector in conclusion to their report noted that:

> *'The Board considered that a grant of permission that* ***could materially contravene the restriction on height set out section 16.7.2 of the Dublin City Development Plan 2016-2022 would be justified in accordance with sections 37(2)(a) of the planning and Development Act 2000****, as amended, having regard to:*
>
> *(a) The Government policy to ramp up delivery of housing from its current under-supply set out in Rebuilding Ireland- Action Plan for Housing and Homelessness issued July 2016.*
> *(b) Objectives 3a, 3b, 10a, 11, 13, and 35 of the National Planning Framework,*
> *(c) Section 5.8 of the Guidelines for Sustainable Residential Developments in Urban Areas issued in 2009,*
> *(d) Section 2.4 of the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities issued in March 2018*
> *(e) SPPR1 of the Guidelines for Planning Authorities on Urban Development and Building Height issued in December 2018,*
> *(f) Objective RPO 4.3 of the Regional Spatial and economic Strategy for the Eastern and Midlands Region 2019-2031 and*
> *(g) Objectives SS01 and SS15 of the Dublin City Development Plan*
>
> ***All of which support denser residential development consisting of apartments on public transport corridors within the built-up area of Dublin City and its suburbs, as is proposed in this case.****'* [Our Emphasis]

A Grant of Permission was issued by An Bord Pleanála on 19th November 2020, subject to 21 No. conditions.

4.2.5 ABP Ref. 304383: Strategic Housing Development at Concorde Industrial Estate, Naas Road Walkinstown

ABP Reg. Ref.	**304383**
ABP Case Ref.	**TA29S.304383**
Location	Lands at Concorde Industrial Estate, Naas Road Walkinstown, Dublin 12.
Applicant	Development Ocht
Application Date	3rd May 2019
Development Description	492 No. Build to Rent units with commercial uses and associated site works in heights ranging from **4-8 No. storeys**.
ABP Decision	Grant Permission subject to 30 No. conditions
Final Grant	15th August 2019

Under ABP Ref. 304283, a Strategic Housing Development (SHD) lodged on 3rd May 2019, permission was sought for the development of 492 No. Build to Rent units with commercial uses and associated site works and associated site works at Concorde Industrial Estate, Naas Road Walkinstown, Dublin 12, the site directly west of the subject site.

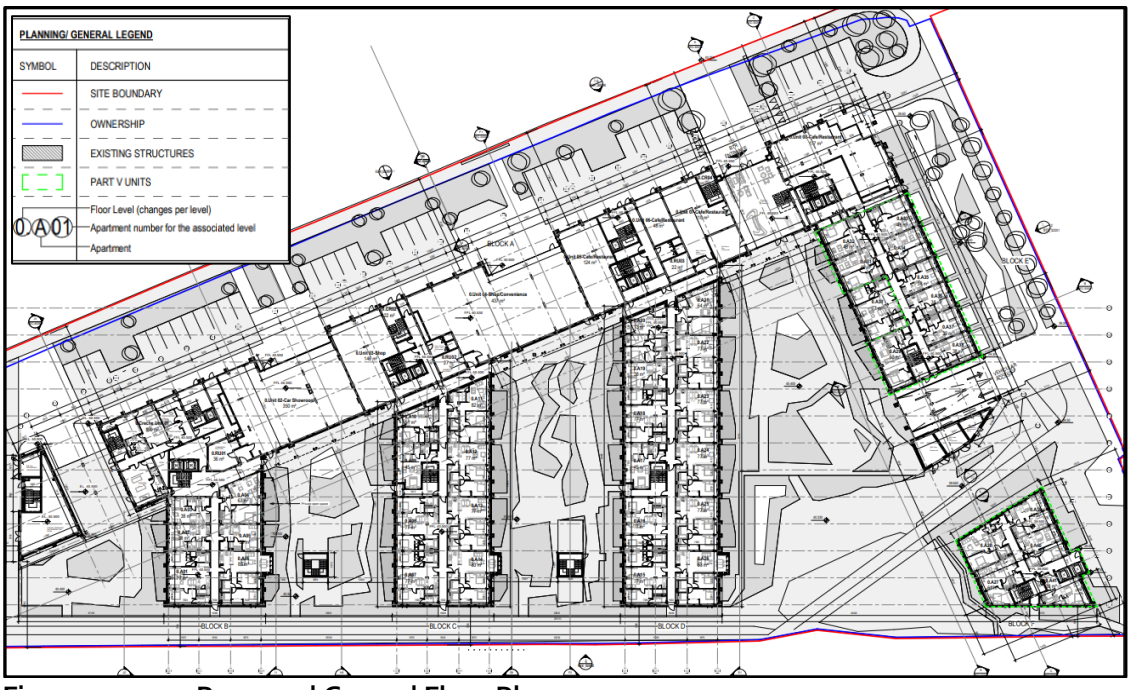

Figure 4.14: Proposed Ground Floor Plan

(Source: Extract from ABP Ref. 304383, annotated by Thornton O'Connor Town Planning, 2023)

The Planning Inspector noted in their report:

> *"I am satisfied that the integration of the development as proposed, and the scale of the apartment blocks is justifiable at this location. Furthermore, the scale and design of the development has considered the potential future-built form of the area in the context of the Local Area Plan. This has been achieved by creating a strong urban edge to the Naas*

Road and the stepping down of finger blocks to the south of the site, thereby reducing potential impacts by way of overlooking and overshadowing of future development. I also consider that the elevational treatment of all blocks in general will add to the amination of the Naas Road and the access road to Carriglea."

A Final Grant of Permission was given for the development on 15th August 2019, subject to 30 No. conditions.

On 21st April 2022, a further application for the development of 545 No. Build to Rent apartments, a creche and associates site works was granted by An Bord Pleanála subject to 30 No. conditions, detailed below.

4.2.6 ABP Ref. 312218: Strategic Housing Development at Concorde Industrial Estate, Naas Road Walkinstown

ABP Reg. Ref.	**312218**
ABP Case Ref.	**TA29S.312218**
Location	Lands at Concorde Industrial Estate, Naas Road, Walkinstown, Dublin 12. (www.concorde2shd.ie)
Applicant	Silvermount Limited
Application Date	15th December 2021
Development Description	Demolition of the existing structures on site, construction of 545 no. Build to Rent apartments of up to of 10 No. storeys, creche and associated site works.
ABP Decision	Grant Permission subject to 30 No. conditions
Final Grant	21st April 2022

Under ABP Ref. 312218, a new application was lodged at the Concorde Industrial Estate site on 15th December 2021, with permission sought for the development of 545 No. Build to Rent apartments of up to of 10 No. storeys, creche and associated site works immediately west of the Gowan House subject site.

Figure 4.15: CGIs of Granted 10 No. Storey Development along Naas Road, Concorde Industrial Estate

(Source: www.concorde2shd.ie, Extract from ABP-312218-21)

The Board's Order concluded:

> *"The Board considers that, while a grant of permission for the proposed strategic Housing Development would not materially contravene a zoning objective of the statutory plans for the area, it would materially contravene the Naas Road Lands Local Area Plan 2013, as extended, in relation to building height, residential density and unit numbers, and it would materially contravene the Dublin City Development Plan 2016-2022 in relation to building heights and core strategy unit numbers.* ***The Board considers that, having regard to the provisions of section 37(2) of the Planning and Development Act 2000, as amended, the grant of permission, in material contravention of the Naas Rad Lands Local Area Plan 2013 as extended, and the Dublin City Development Plan 2016-2022, would be justified for the following reasons and considerations****.*
>
> ***The proposed development is considered to be of strategic and national importance given its potential as a site located within the Naas Road area designated as "Strategic Development and Regeneration Area 5 – Naas Road in the Dublin City Development Plan 2016-2022" and its potential to substantively contribute to the achievement of the Governments national policy to increase housing supply, as set out in "Housing for All, A New Housing Plan for Ireland" issued by the Department of Housing, Local Government and Heritage September 2021 and "Rebuilding Ireland Action Plan for Housing and Homelessness 2016" within the Dublin Metropolitan Area Strategic Plan Area on high capacity, high frequency public transport corridor, with links to further sustainable modes of the transport network.***" [Our Emphasis]

Figure 4.16: Northern Elevation of Proposed Development at the Concorde Industrial Estate Site fronting Naas Road

(Source: www.concorde2shd.ie, Extract from ABP-312218-21)

On 21st April 2022, an amendment permission for the development of 545 No. Build to Rent apartments, a creche and associates site works was granted by An Bord Pleanála subject to 30 No. conditions.

Figure 4.17 overleaf provides a summary of the heights and densities granted on adjoining sites demonstrating the significant and intense regeneration of this area, in line with national planning policy requirements.

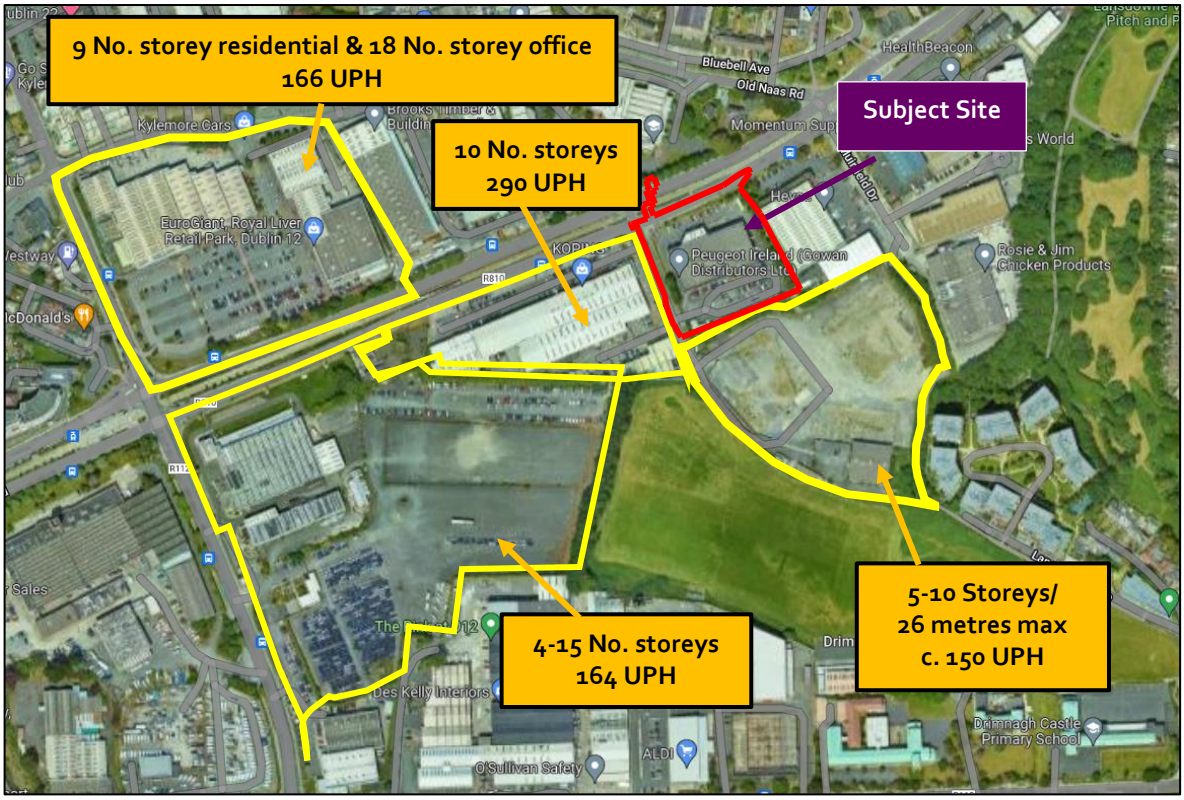

Figure 4.17: **Summary of Planning History**

(Source: **Google Earth, annotated by Thornton O'Connor Town Planning, 2023)**

4.3 Planning History Review

It is clear from a review of the Planning History that the area is undergoing significant regeneration as per the Naas Road LAP with works well advanced on the Carriglea site for example.

The proposed site has a key role to play in the overall regeneration of these lands, given it daylights the River Camac and provides the spine of open space set out as an objective in the now expired Naas Road LAP. This node is an important 'place' in the future townscape, allowing an increased albeit logical stepped approach to height on the subject site.

If granted, the Applicant intends to commence construction immediately as Hollybrook Homes construct their permitted schemes themselves.

5.0 DETAILS OF THE DEVELOPMENT DESCRIPTION

5.1 Description of Development

The proposed development is described in the Statutory Notices as follows:

> *"Malclose Limited intend to apply to Dublin City Council for a 7-year permission for a large-scale residential development principally comprising student accommodation at this 0.962 Ha site at Gowan House, Carriglea Business Park, Naas Road, Dublin 12, D12 RCC4.*
>
> *Works to upgrade the access road to the west of the site on an area measuring c. 0.081 Ha are also proposed comprising new surfacing to the carriageway, the provision of inbound and outbound bicycle lanes from the development entrance to the Naas Road, the provision of a controlled pedestrian crossing on the access road at the Naas Road junction, and the provision of a further uncontrolled pedestrian and bicycle crossing linking the subject site with the approved Concorde SHD development (ABP Ref: TA29S.312218) to the west.*
>
> *On the Naas Road, works are proposed on an area measuring c. 0.086 Ha comprising the realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road and the provision of linkages from the realigned footpath to the development site, and the provision of new controlled pedestrian crossings across the eastbound and westbound carriages of the Naas Road and the provision of a new uncontrolled crossing of the Luas tracks.*
>
> *The development site area and roadworks areas will provide a total application site area of c. 1.13 Ha.*
>
> *The proposed development will principally consist of: the demolition of the existing two-storey office/warehouse building and outbuilding (5,172 sq m); and the construction of a development in two blocks (Block 1 (eastern block) is part 2 No. storeys to part 15 No. storeys over lower ground floor and basement levels with roof plant over and Block 2 (western block) is part 9 No. storeys to part 11 No. storeys over basement with roof plant over) principally comprising 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios) with associated facilities, which will be utilised for short-term lets during student holiday periods. The 871No. standard rooms are provided in 123 No. clusters ranging in size from 3 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.*
>
> *The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (1,422 sq m internal and 131 sq m external) principally comprising a digital hub and co-working space with ancillary cafe; a retail unit (250 sq m); public open space; the daylighting of the culverted River Camac through the site; an elevated walkway above the River Camac at ground floor level; a pedestrian bridge link at first floor level between Blocks 1 and 2; vehicular access at the south-western corner; the provision of 7 No. car-parking spaces, 2 No. motorcycle parking spaces and 2 No. set down areas; bicycle stores at ground and lower ground floor levels; visitor cycle parking spaces; bin stores; substations; hard and soft landscaping; green and blue roofs; new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18*

No. antennas and 6 No. transmission dishes, together with all associated equipment; boundary treatments; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 33,140 sq m comprising c. 30,386 sq m above lower ground and basement level."

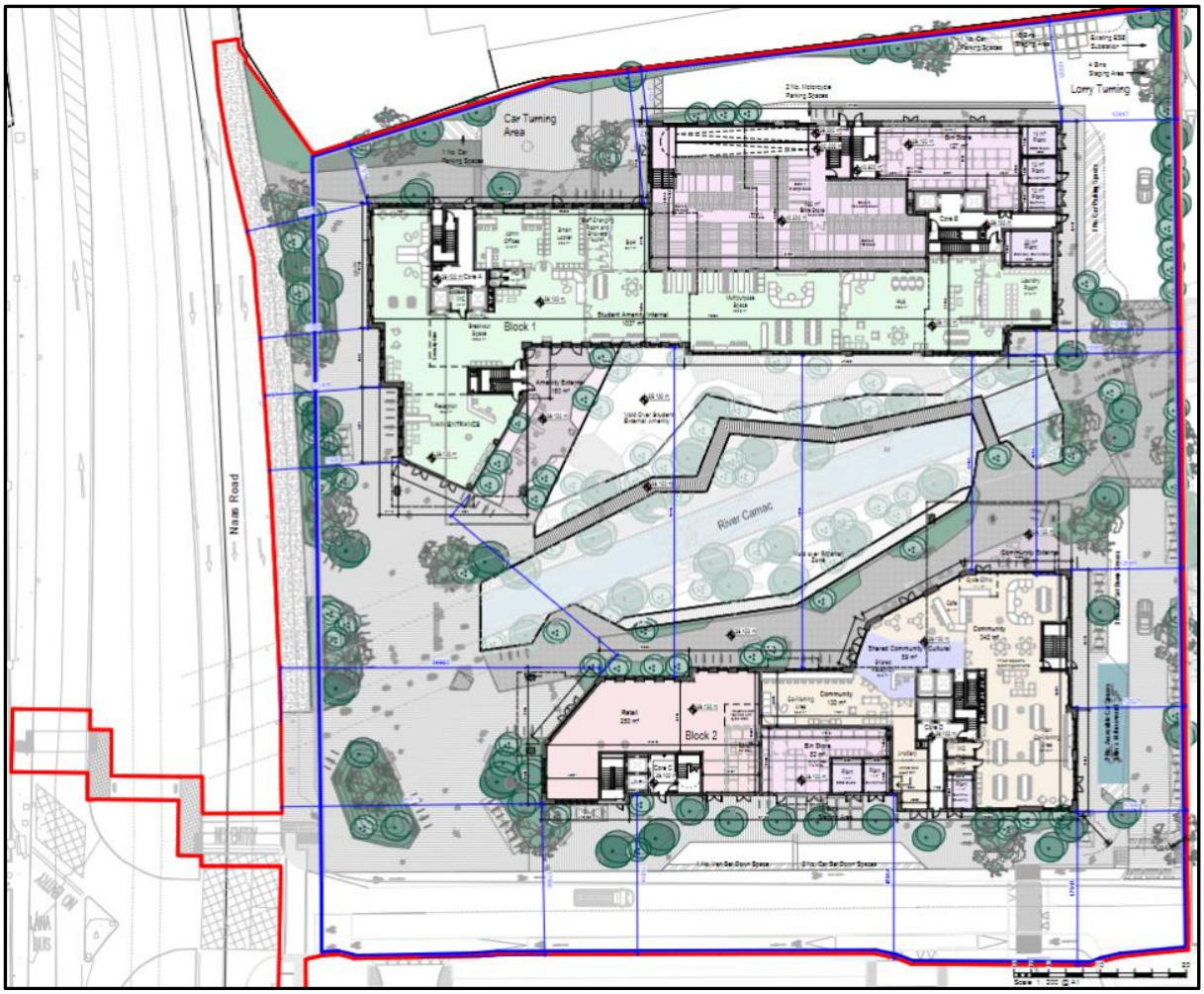

Figure 5.1: Proposed Site Plan

(Source: 'Ground Floor Plan', HKR Architects)

5.2 Key Statistics

Total Development Site Area		0.962 Ha
Total Application Site Area		1.13 Ha
Total Demolition Floor Area		5,172 sq m
Total Gross Floor Area		33,140 sq m
Total Gross Floor Area (excl. Basement & Lower Ground Floor)		30,386 sq m
Site Coverage		36%
Plot Ratio		3.2:1
Building Heights		Block 1 – part 2 No. storeys to part 15 No. storeys above lower ground floor and basement level Block 2 – part 9 No. storeys to part 11 No. storeys above basement level
Student Accommodation		941 No. bedspaces
Communal Student Amenity Space	**Internal**	4,027 sq m
	External	1,174 sq m
Communal Student Amenity Space per bedsapce		5.53 sq m
Retail Unit		250 sq m
Cultural Space	**Internal**	729 sq m
	External	0 sq m
Community Space	**Internal**	472 sq m
	External	40 sq m
Shared Cultural & Community Space	**Internal**	221 sq m
	External	91 sq m
Car Parking		7 No. spaces (including 2 No. accessible spaces)
Bicycle Spaces		1,162 No. spaces (941 No. internal spaces for students, 218 No. external spaces for visitors and 3 No. internal spaces for staff of the retail/cultural/community uses)

Table 5.1: Key Statistics for the Proposed Development

(Source: Design Proposal by HKR Architects)

5.3 Design & Layout

5.3.1 Student Accommodation

The proposed development will provide 941 No. student bedspaces within 2 No. Blocks, namely: Block 1; and Block 2. Block 1 is located to the east of the site and Block 2 is located to the west, with the daylighting of the River Camac separating the blocks. These blocks are split up into 4 No. cores (Core A and Core B in Block 1; and Core C and Core D in Block 2). This is illustrated in Figure 5.2 below.

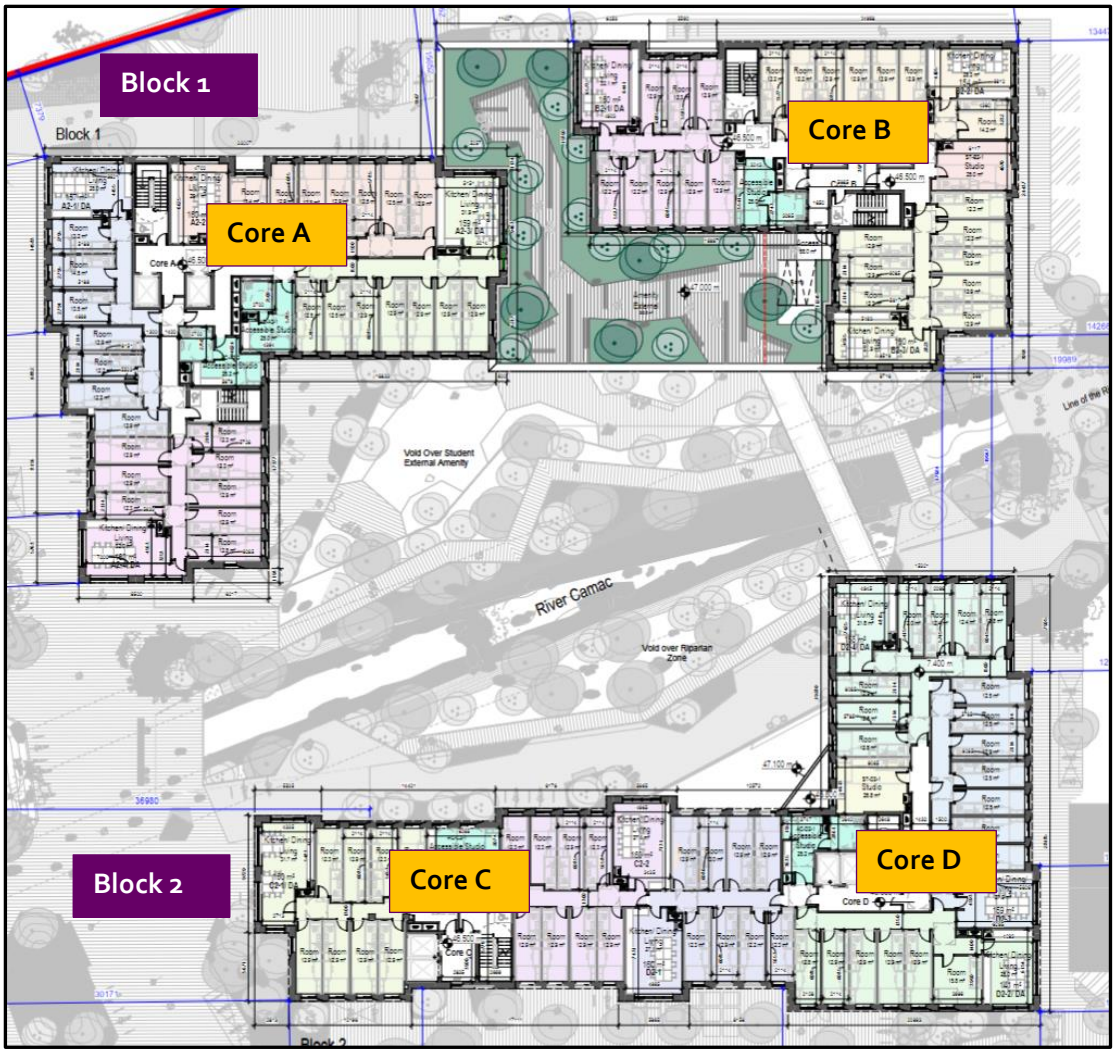

Figure 5.2: **Second Floor Plan Indicating Block 1 with Core A & B and Block 2 with Core C & D With the Daylighted River Camac Located Between Each Block**

(Source: **'Second Floor Plan' by HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)**

Student Unit Type

The student accommodation will provide 871 No. standard rooms, 47 No. accessible studios, and 23 No. studios. A typical standard room measures 12.86 sq m and will include individual en-suites, an accessible studio typically measures 25 sq m, and studios typically measure 25 sqm. Each cluster will provide a minimum of 4 sq m per bedspace of kitchen / living space, i.e. a 7 No. person cluster will be provided with a kitchen / living area measuring a minimum of 28 sq m.

Table 5.2 overleaf provides a breakdown of the number and type of rooms provided on each floor level.

Floor	Block 1						Block 2					
	Core A			Core B			Core C			Core D		
	Stnd	Acc	Stu	Stnd	Acc	Stu	Stnd	Acc	Stu	Stnd	Acc	Stu
Basement	-	-	-	-	-	-	-	-	-	-	-	-
Lower Ground Floor	-	-	-	-	-	-	-	-	-	-	-	-
Ground Floor	-	-	-	-	-	-	-	-	-	-	-	-
First Floor	14	1	-	-	-	-	-	-	-	-	-	-
Second Floor	29	2	-	23	1	1	16	1	-	28	1	1
Third Floor	29	2	-	23	1	1	16	1	-	28	1	1
Fourth Floor	29	2	-	23	-	2	16	1	-	28	1	1
Fifth Floor	29	2	-	23	-	2	16	1	-	28	1	1
Sixth Floor	29	2	-	23	-	2	16	1	-	28	1	1
Seventh Floor	29	2	-	23	-	2	16	1	-	28	1	1
Eighth Floor	29	2	-	23	-	2	16	1	-	28	1	1
Ninth Floor	29	2	-	23	-	2	16	1	-	14	1	2
Tenth Floor	16	2	-	-	-	-	12	1	-	11	1	-
Eleventh Floor	16	2	-	-	-	-	-	-	-	-	-	-
Twelfth Floor	16	2	-	-	-	-	-	-	-	-	-	-
Thirteenth Floor	16	2	-	-	-	-	-	-	-	-	-	-
Fourteenth Floor	16	2										
Total	**326**	**27**	**0**	**184**	**2**	**14**	**140**	**9**	**0**	**221**	**9**	**9**
N.B. Stnd = Standard Room, Acc = Accessible Studio, and Stu = Studio												

Table 5.2: Student Accommodation Schedule

(Source: HKR Architects Design Scheme)

Clusters

There is a total of 123 No. clusters between Block 1 and Block 2, with clusters ranging from 3 No. student bedspaces to 8 No. student bedspaces. The area of clusters varies in size, with the smallest cluster (3 No. person cluster) measuring 66 sq m, and the largest cluster (8 No. person cluster) measuring 160 sq m. It is noted that the accessible studios and standards studios are not included in the clusters.

Table 5.3 overleaf indicates the type of cluster located on each floor level.

Floor	3 Person Cluster	4 Person Cluster	5 Person Cluster	6 Person Cluster	7 Person Cluster	8 Person Cluster
Basement	-	-	-	-	-	-
Lower Ground Floor	-	-	-	-	-	-
Ground Floor	-	-	-	-	-	-
First Floor	-	-	-	-	2	-
Second Floor	-	-	-	1	6	6
Third Floor	-	-	-	1	6	6
Fourth Floor	-	-	-	1	6	6
Fifth Floor	-		-	1	6	6
Sixth Floor	-		-	1	6	6
Seventh Floor	-		-	1	6	6
Eighth Floor	-		-	1	6	6
Ninth Floor	-		-	1	4	6
Tenth Floor	1	1	2	1	-	2
Eleventh Floor	-	-	2	1	-	-
Twelfth Floor	-	-	2	1	-	-
Thirteenth Floor	-	-	2	1	-	-
Fourteenth Floor	-	-	2		-	-
Total	**1**	**1**	**10**	**13**	**48**	**50**

Table 5.3: Cluster Schedule

(Source: HKR Architects Design Scheme)

Access

Students will access Block 1 via the main entrance located at the northern side of the building, and to access Block 2 students will use the main entrance located in Block 1 and then the access bridge / link provided to Block 2. Students will be able to access their floor through numerous lifts and staircases at suitably located areas throughout each core in Block 1 & 2. This is demonstrated in Figure 5.3 below.

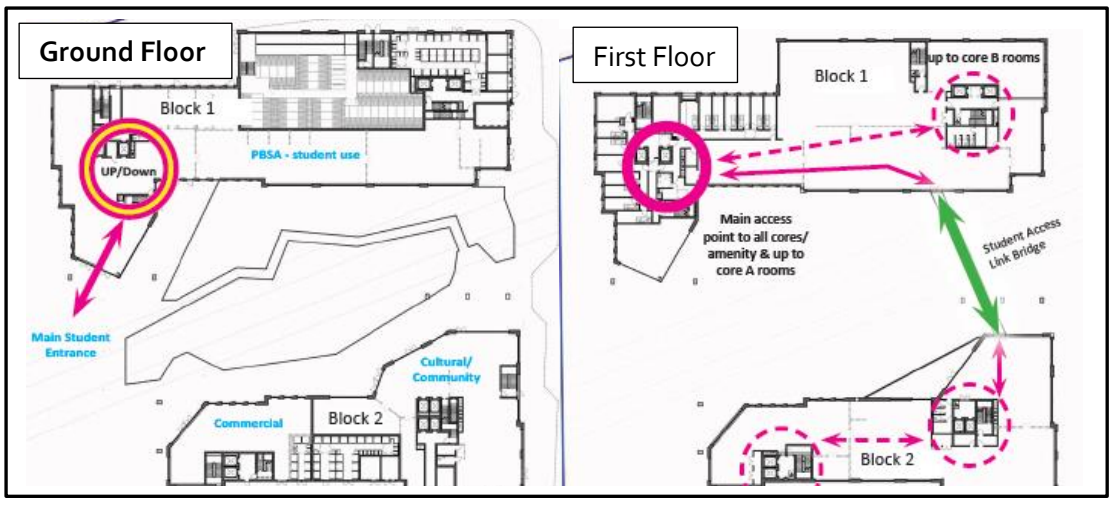

Figure 5.3: Access to Block 1 & 2 of the Student Accommodation

(Source: HKR Design Statement, Annotated by Thornton O'Connor Town Planning, 2023)

Bin Storage

There will be 2 No. bin stores for each block. The bin store for Block 1 measures 128 sq m and is located on the eastern part of the ground floor. The bin store for Block 2 measures 82 sq m and is located on the western part of the ground floor.

5.3.2 Height

The proposed development includes the construction of 2 No. Blocks to accommodate 941 No. student bedspaces. The height of Block 1 is to be part 2 No. storeys to part 15 No. storeys (above lower ground floor basement level) and Block 2 is to be part 9 No. storeys to part 11 No. storeys (above basement level). The development, at its highest point, is 46.1 m above basement and lower ground floor level.

Figure 5.4: North Elevation of the Proposed Development (Naas Road onto the Subject Site)

(Source: 'North Elevation 5' Drawing, HKR Architects)

As demonstrated in Figure 5.5, the proposed building height is respective of the surrounding area and is notably smaller in height to the nearby Royal Liver Block A to the west of the subject site which proposes 18 No. storeys / 77.6 m.

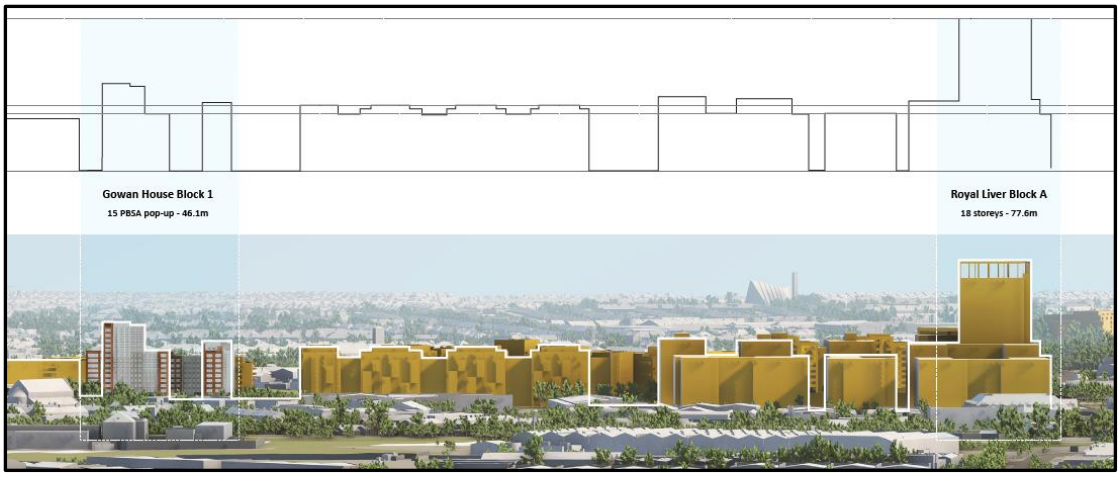

Figure 5.5: Height of the Proposed Development in Comparison to Nearby Developments Along Naas Road

(Source: *Design Statement*, HKR Architects)

5.3.3 Building Materials

The proposed apartment blocks have been designed by a highly experienced Design Team, taking into consideration the character of the surrounding area and how the buildings will create new, active frontage onto Naas Road. This aspect played a crucial role in the design rationale of the scheme whereby the type of colour, materials and textures of the buildings, and notably the façade fronting Naas Road, were critical factors in order to create a high-quality development that would not dominate the surrounding area. As stated in the *Design Statement* prepared by HKR Architects, the design of the scheme has been created to intentionally have an element of articulation.

The modulation of the buildings and 'stepping down' approach to the various levels, ensures that the proposed development will break down the mass of the building. The modulation effect breaks up larger elements of the building by providing different materials and textures. Different colour tones on the panels are to be used to add variety and visual interest. The floor-to-floor height of the basement to second floor level are higher than the second floor level to roof level, which, when combined with the different uses at the lower levels to the upper levels, breaks up the visual appearance of the building. As well as the different floor-to-floor heights and uses, there will be horizontal banding made from precast panels with vertical moulds in order to break up the design vertically. In terms of the commercial and the cultural/community spaces within the buildings, the façade has been designed so as to have a different character to that of the student accommodation design, however, similar materials and details will still be incorporated to tie in with the overall design. The submitted *Design Statement* prepared by HKR Architects provides more detail of the different colours and materials to be used:

> "***Colour***
>
> *Different concrete tones applied throughout act as another design tool to further break down the overall mass of the scheme. By applying complementary or contrasting colours, the facades are broken down in scale further, adding variety and interest to the overall composition.*

Indicative Material Plate

The main material employed in the façade design is pre-cast concrete. This provides a high quality finish capable of taking a large variety of colours textures and patterns which will be applied to the façade panel mould. This is a robust low maintenance material that will ensure the continued appearance of the façade during the buildings' occupancy / lifestyle."

Figure 5.6: Proposed Building Material, Texture and Colours

(Source: *Design Statement*, HKR Architects)

5.3.4 Public Open Space

There will be 3,000 sq m of Public Open Space provided in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway (above the Riparian Zone). The general location of the public open space is illustrated in Figure 5.7 and is represented by the orange colour. The CGI image in Figure 5.8 provides an overview of the proposed public open spaces.

Figure 5.7: **Public Open Space Provision**

(Source: ***Landscape Report*** **prepared by Stephen Diamond Associates)**

Figure 5.8: **CGI of the Proposed Development With Public Open Spaces Shown**

(Source: **CGI prepared by 3D Design Bureau)**

Central Plaza

The Central Plaza marks the entrance to the subject site for members of the public as it fronts onto the Naas Road, allowing people to enter the space and escape the built-up and hardstanding nature of the Naas Road. This space will bring vibrancy and activity along Naas Road and will encourage people to make use of the other public open spaces on site.

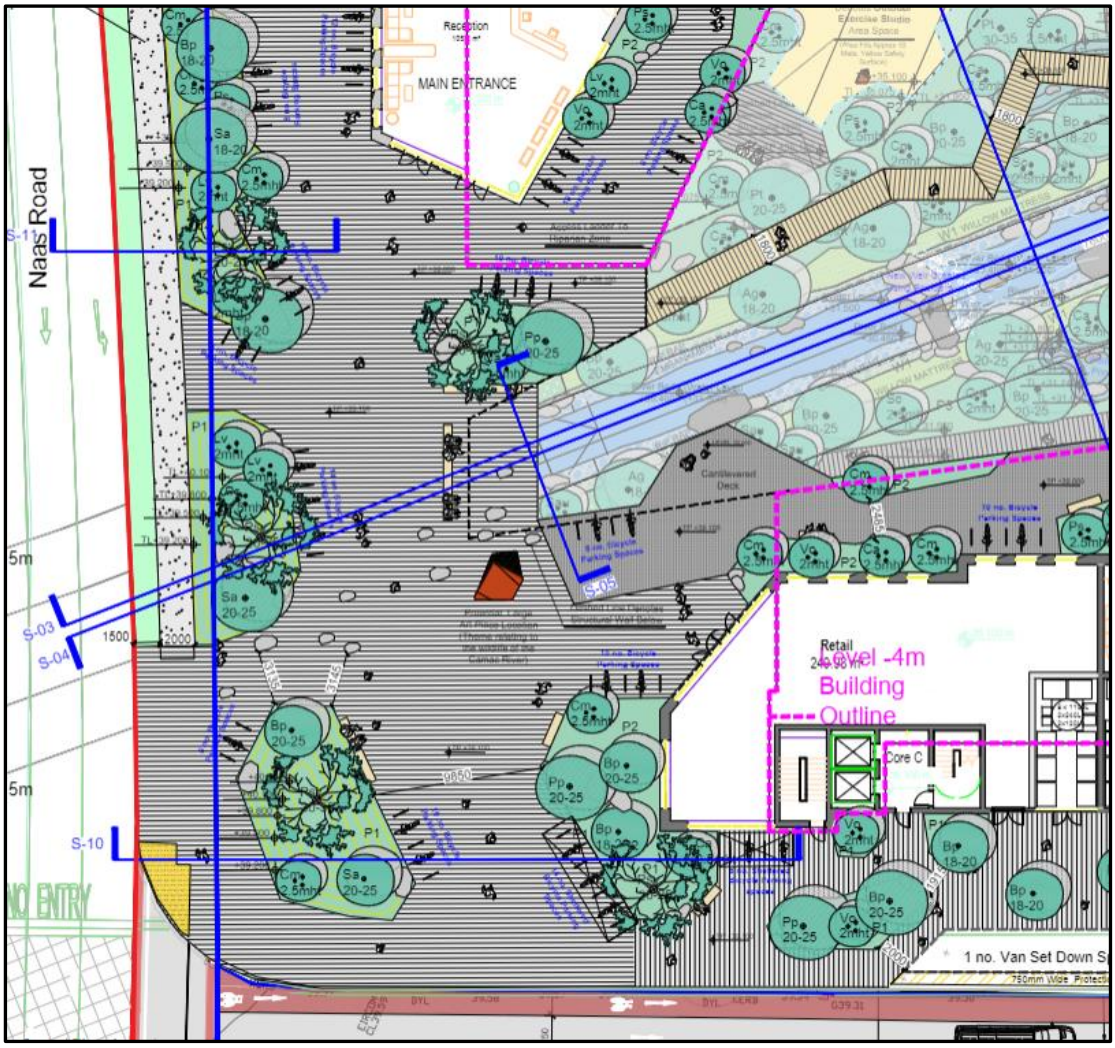

Figure 5.9: Central Plaza Layout

(Source: *Landscape Masterplan* prepared by Stephen Diamond Associates)

Figure 5.10: CGI of the Central Plaza

(Source: CGI prepared by 3D Design Bureau)

Connection Plaza

The main goal of the Connection Plaza is to connect the proposed development to the Carriglea Development directly to the south of the subject site. A smooth transitional link will be provided between the green space to the north of the Carrigelea site and the Riparian Zone on the subject site. As stated in the *Landscape Report* prepared by Stephen Diamond Associates:

> "*The Connection Plaza is designed as a place of contemplation and recreation…Such gathering spaces like this are becoming increasingly important to our psychological health and well-being due to the hectic nature of our lives, the increasingly urbanised nature of our environment and the increasing sense of isolation experienced by many. They specifically play an important role in apartment and student accommodation developments providing an opportunity for people from different floors and residential development to meet.*"

The space is designed as a shared surface to facilitate pedestrian movements as the priority, but with occasional vehicle access to towards the east of the subject site. In order to slow down vehicles along this space, and re-enforce the idea of pedestrian priority, amorphous-shaped planters will be installed, which will also create an attractive environment.

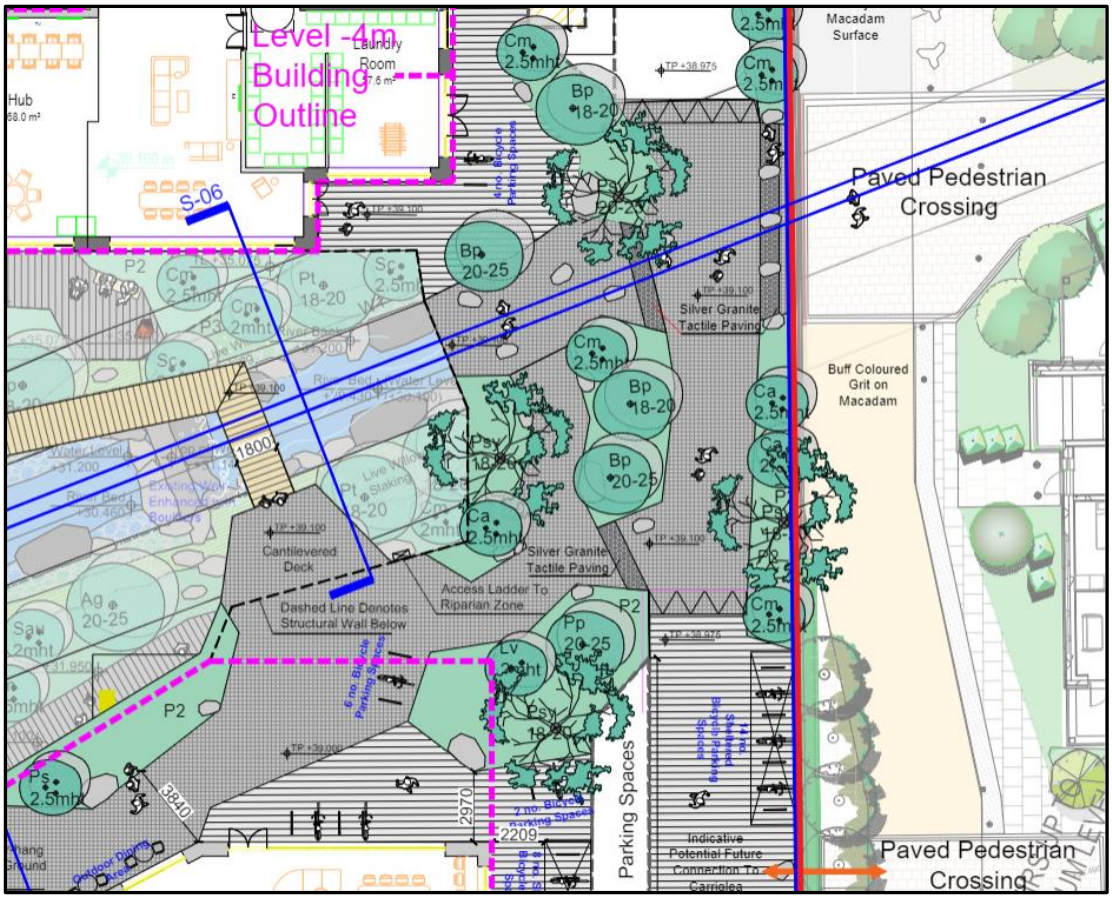

Figure 5.11: **Connection Plaza**

(Source: ***Landscape Masterplan*** **prepared by Stephen Diamond Associates)**

Figure 5.12: **CGI of the Connection Plaza**

(Source: **CGI prepared by 3D Design Bureau)**

Green Route Boulevard

Located along the western boundary between Block 2 and No-Name Lane, the Green Route Boulevard will provide 2 No. social hubs where people have the opportunity to meet one another and socialise.

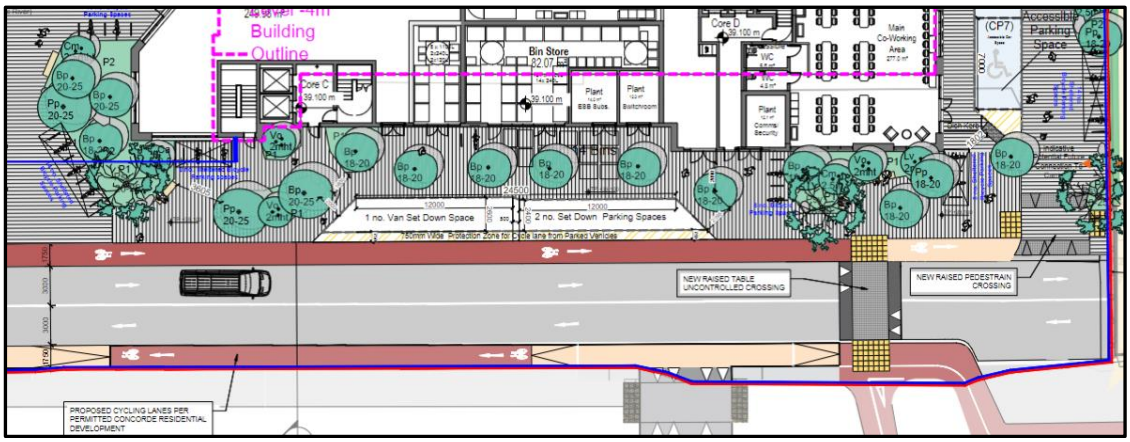

Figure 5.13: Green Route Boulevard

(Source: *Landscape Masterplan* prepared by Stephen Diamond Associates)

Elevated Walkway (above the Riparian Zone)

The daylighting of the culverted River Camac will provide new green space and biodiversity to the subject site. Although the riverbed itself will not be accessible to students and the public, elevated walkways through the riparian vegetation will connect the Central Plaza with the Connection Plaza, and the green space in Carriglea to the south of the subject site. Not only will this space provide a link to the Carriglea site, but it will also allow people to have a special close-up experience and direct connection with nature, while protecting the sensitive riparian environment below. The elevated walkways will be accessed at ground floor level and will be provided through cantilevered decks that project outwards from the edges of the Riparian Zone.

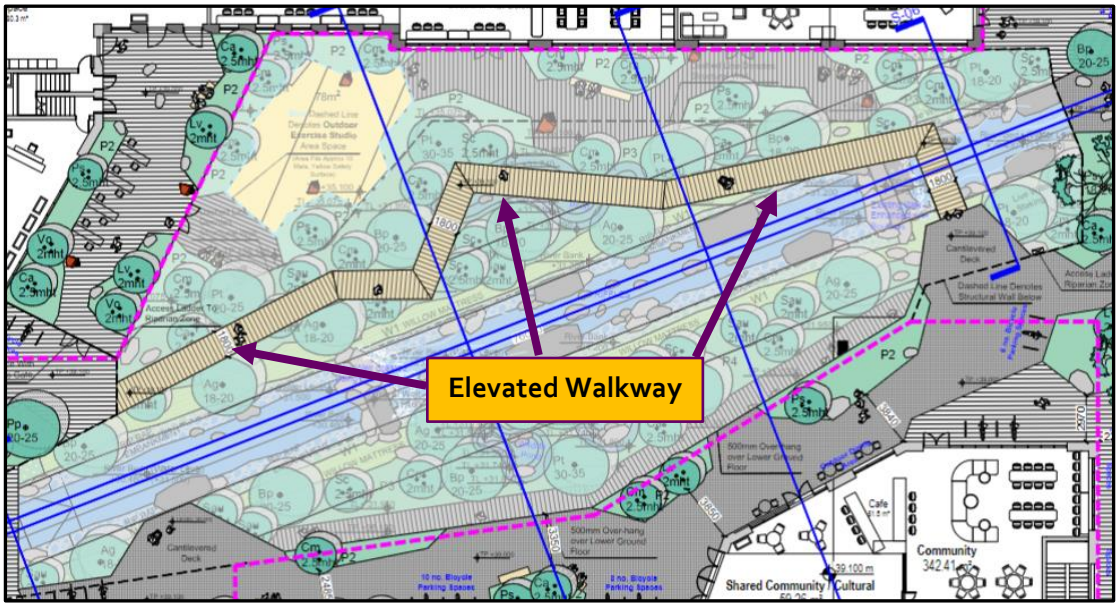

Figure 5.14: Elevated Walkway above the Riparian Zone

(Source: ***Landscape Masterplan*** **prepared by Stephen Diamond Associates, Annotated by Thornton O'Connor Town Planning, 2023)**

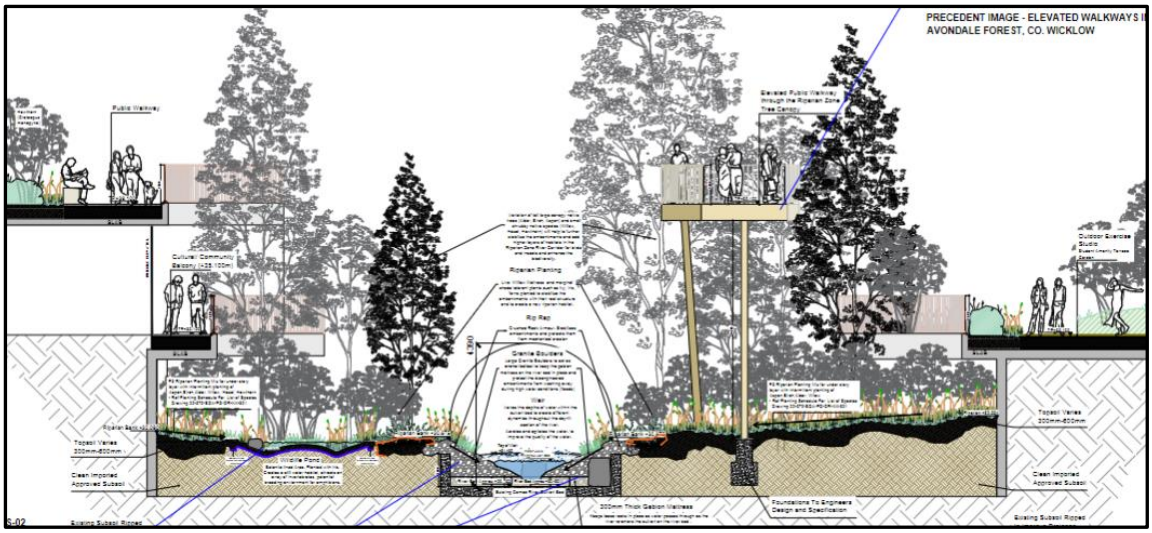

Figure 5.15: Elevated Walkway above the Riparian Zone

(Source: **'Section 02' and the** ***Landscape Masterplan*** **prepared by Stephen Diamond Associates)**

Figure 5.16: CGI of the Elevated Walkway

(Source: CGI prepared by 3D Design Bureau)

The Riparian Zone creates 1,261 sq m of open space (13% of the site area) on the subject site, providing visual amenity and biodiversity net gain. Due to the future protection of the flora and fauna created, the space is not included as useable public open space as it is not accessible by people as requested by the Parks Department of Dublin City Council. The area covered by the riparian zone is highlighted in green in Figure 5.17.

Figure 5.17: Public Open Space Provision (Accessible) and the Riparian Zone (Inaccessible)

(Source: *Landscape Report* prepared by Stephen Diamond Associates)

5.3.5 Communal Amenity Space

The proposed development will include a total of 5,201 sq m of communal amenity space, provided internally and externally, and will be fully private for student use only. A bridge will be constructed to connect the two amenity spaces at first floor level at the southern end of each block, so that students in each block will be able to benefit from all amenity space proposed.

Internally, the communal amenity space will be provided at basement level, ground and first floor, distributed amongst Blocks 1 & 2. At basement level there will be 897 sq m of amenity space provided in Block 1; at ground floor level there will be 1,037 sq m of amenity space provided in Block 1; and at first floor level there will be 1,211 sq m of amenity space provided in Block 1 and 882 sq m provided in Block 2.

The large quantum of communal amenity space will provide hubs, a game room and karaoke lounge for students to hangout and socialise with one another, while the library and breakout space will provide a quiet space for students to study outside their bedroom. A gym is also provided to promote a healthy lifestyle amongst students.

The internal amenity space at basement level and first floor level will have direct access to external amenity spaces, while the internal amenity space at ground floor level has direct access to/from the Central Plaza.

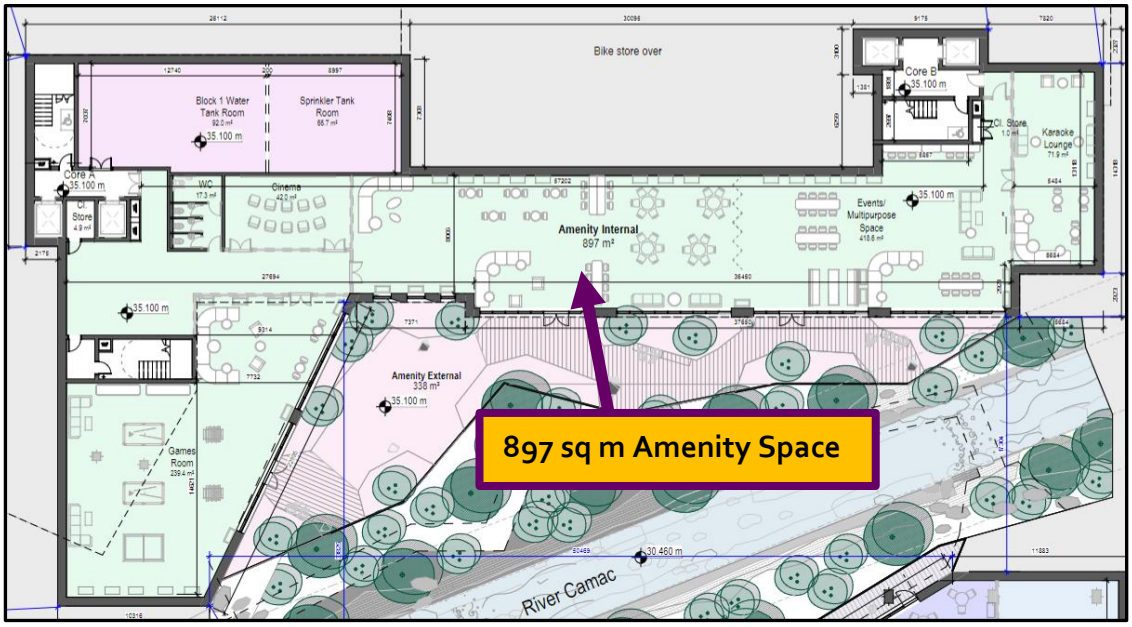

Figure 5.18: Location of Amenity Space on Basement Level in Block 1

(Source: 'Basement Floor Plan' HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)

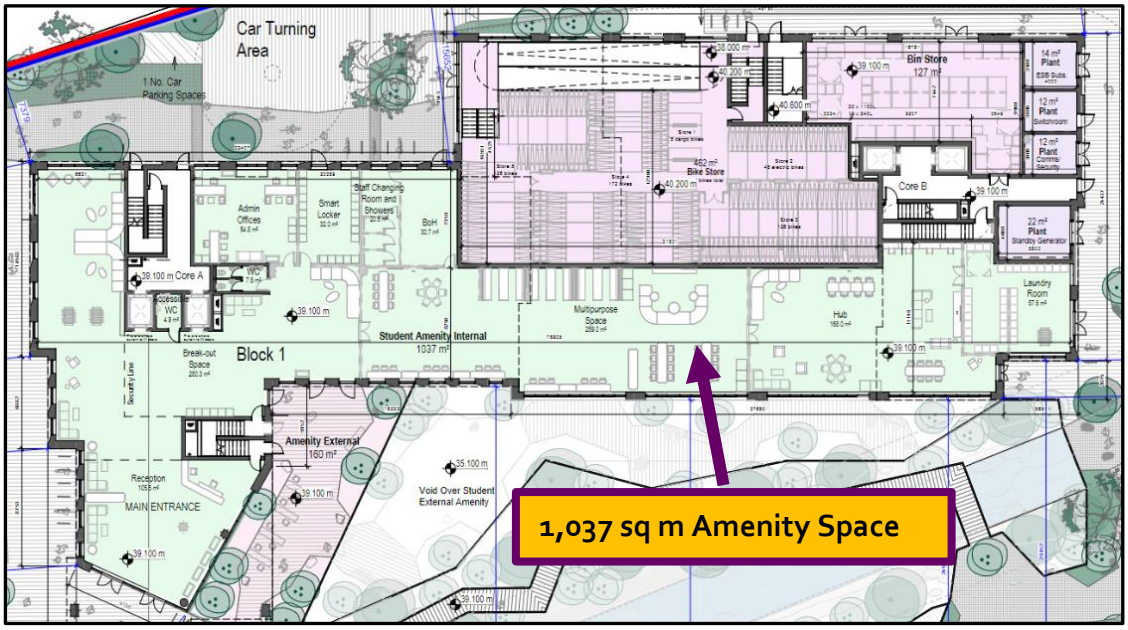

Figure 5.19: Location of Amenity Space on Ground Floor Level in Block 1

(Source: 'Ground Floor Plan' HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)

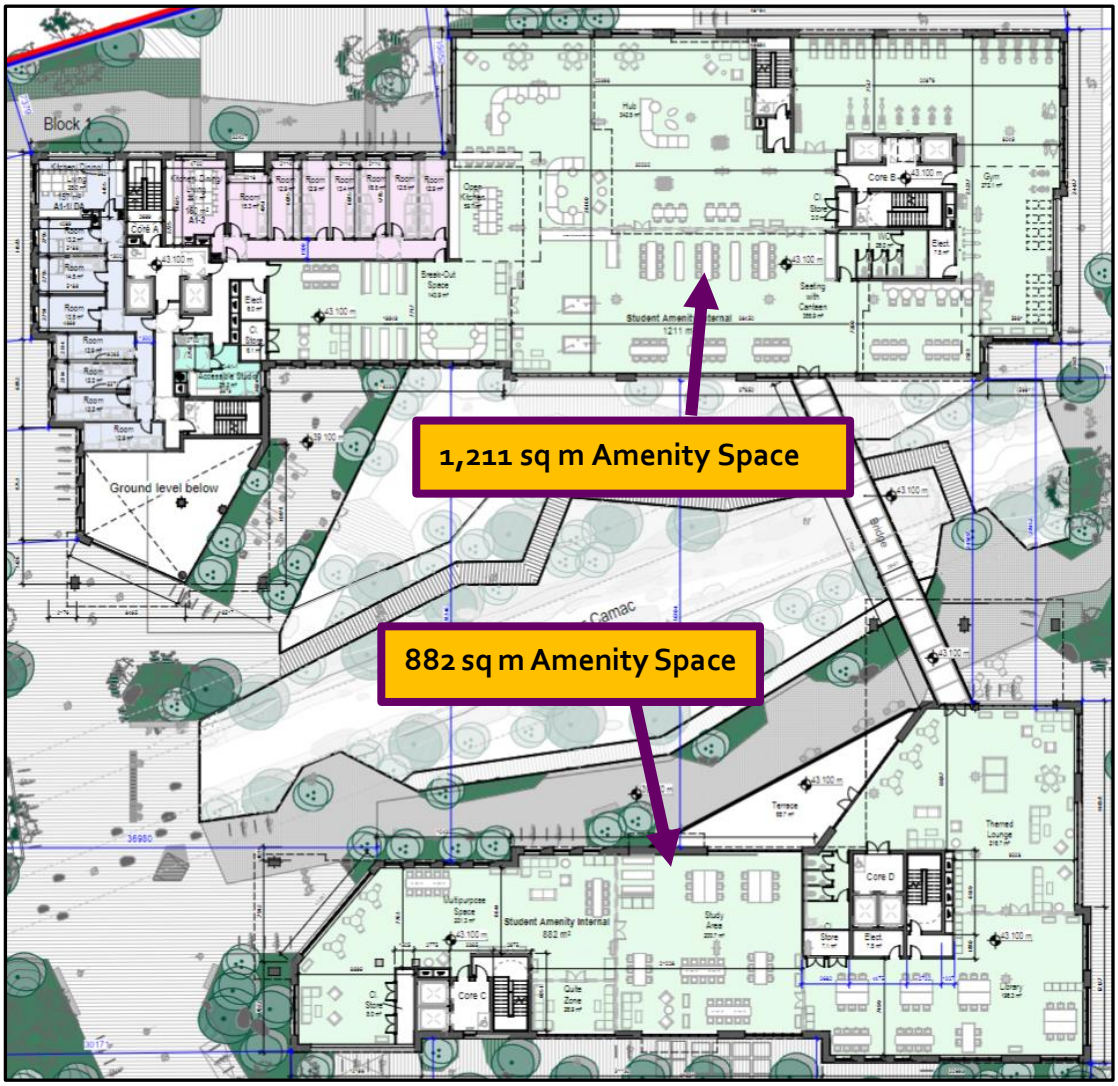

Figure 5.20: Location of Amenity Space on First Floor Level in Block 1 and 2

(Source: 'First Floor Plan' HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)

In order to maintain the generous quantum of public space, the design team has opted to locate the external communal amenity space across two main roof gardens, open space, and a terrace, incorporating intensive green planting. The location of the external communal amenity space will be provided at basement level, ground, second and nineth floor level. At basement level there will be 338 sq m of amenity space in the form of a terrace, that looks out over the Riparian Zone, and is located at Block 1; at ground floor level there will be 160 sq m of amenity space provided at the western side of Block 1; at second floor level there will be 387 sq m of amenity space provided in the form of a roof garden between Core A and Core B of Block 1; and at nineth floor level there will be 289 sq m of amenity space provided in the form of a roof garden to the southeast of Block 2.

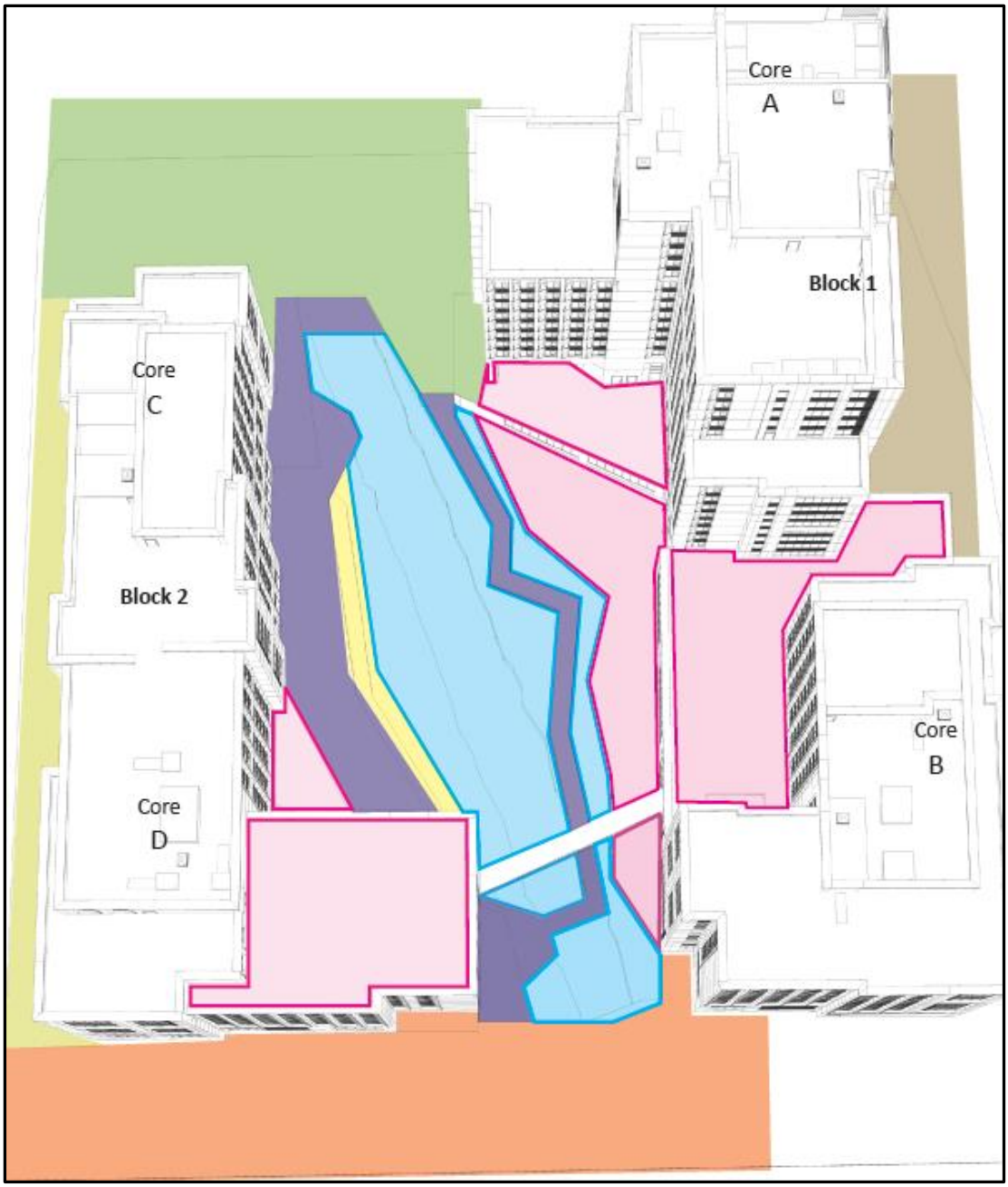

Figure 5.21: External Amenity Space Highlighted in Pink

(Source: *Design Statement* prepared by HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)

The outdoor terrace at basement level will be used as an outdoor exercise area in which students can bring an exercise matt outside and stretch, do yoga, meditate, free weight exercises or bring out various weights from the gym.

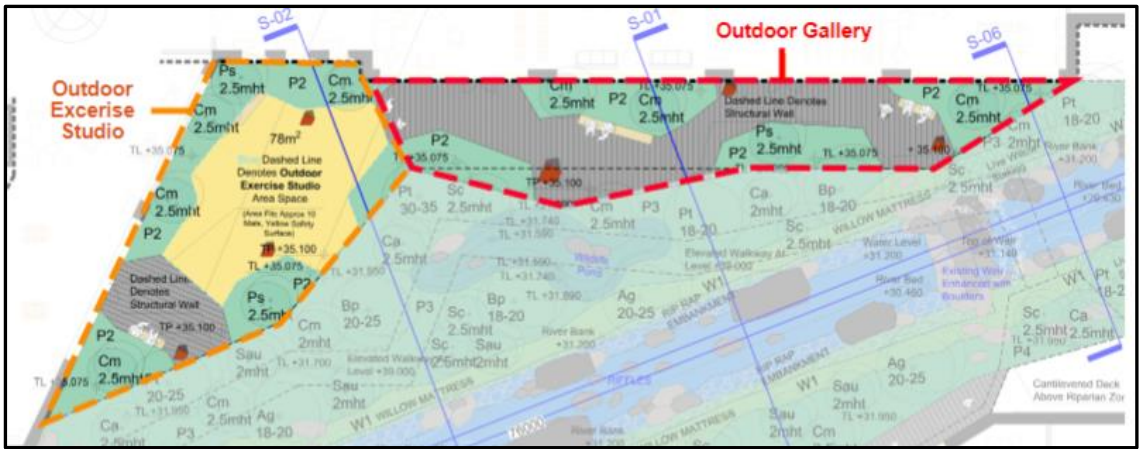

Figure 5.22: Landscape Plan of the External Amenity Space at Basement Level

(Source: *Landscape Report*, Stephen Diamond Associates)

The ground floor level space will provide a dedicated external study area for students to get some fresh air whilst studying or writing any assignments, with desks, chairs and benches provided. A 1.8 metre high fence with a gate and planting buffer separates this external space from the public open space at ground floor level.

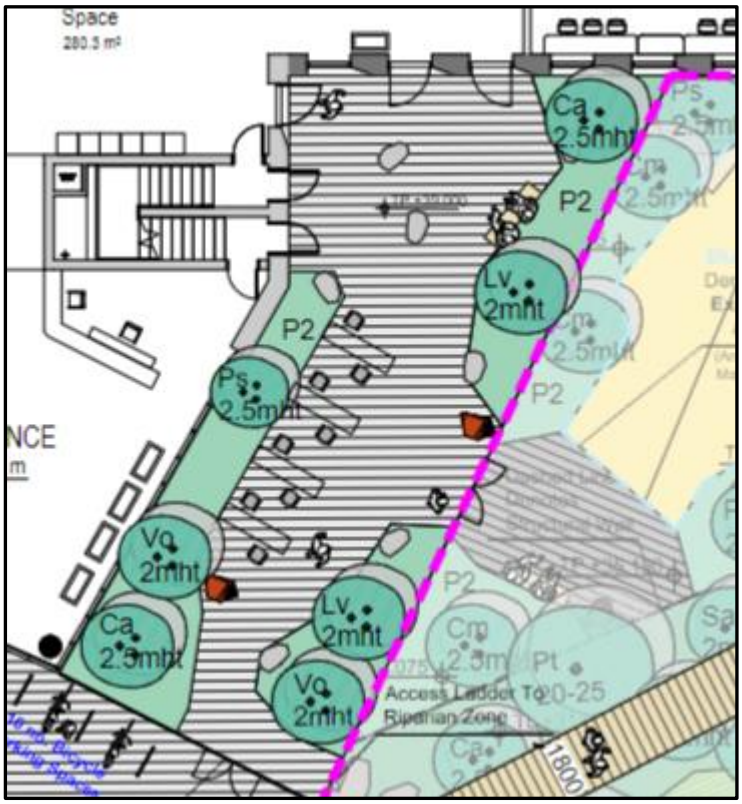

Figure 5.23: Landscape Plan of the External Amenity Space at Ground Floor Level

(Source: *Landscape Report*, Stephen Diamond Associates)

The roof gardens will benefit from large green spaces and benches, providing a place that is visually attractive for students to socialise with one another, or somewhere for them to relax by themselves. The roof gardens will be 50% covered in intensive planting, adding to the biodiversity gain of the site. More details relating to the proposed planting of the roof

gardens is provided in the accompanying *Landscape Report* prepared by Stephen Diamond Associates.

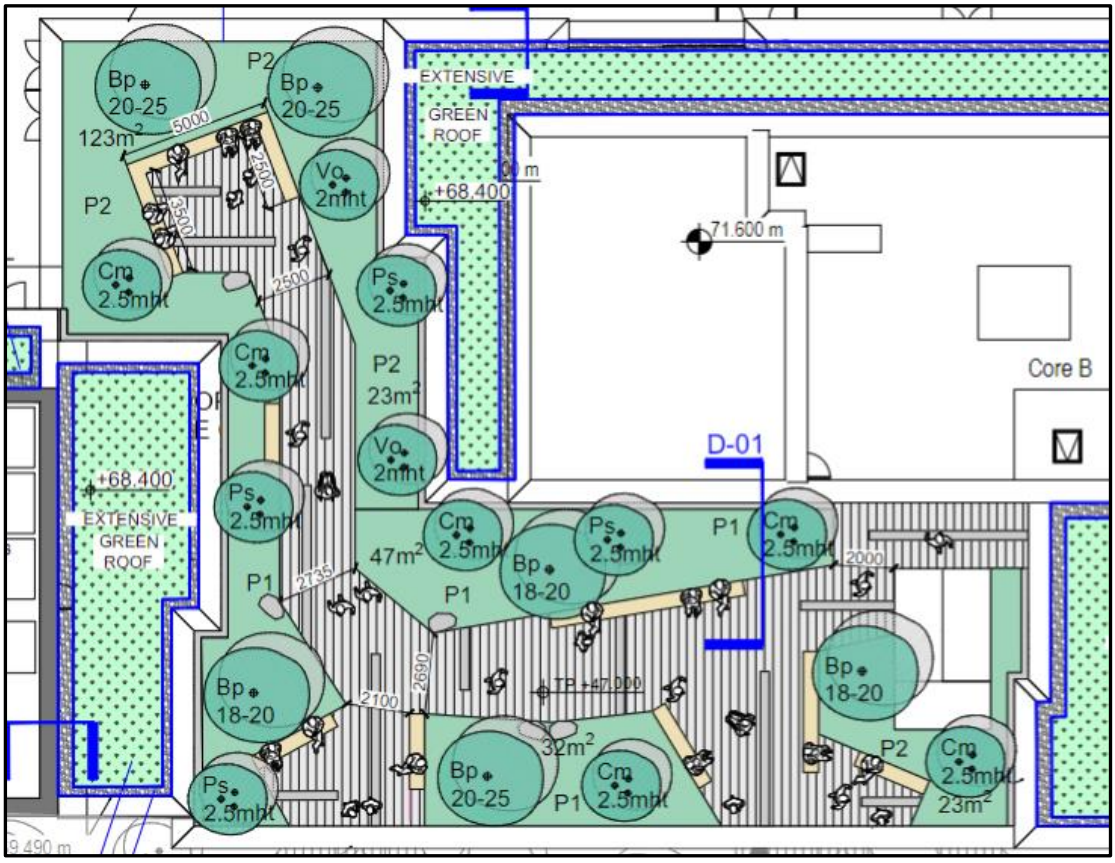

Figure 5.24: Landscape Plan of the External Amenity Space on Second Floor Level

(Source: *Landscape Report*, Stephen Diamond Associates)

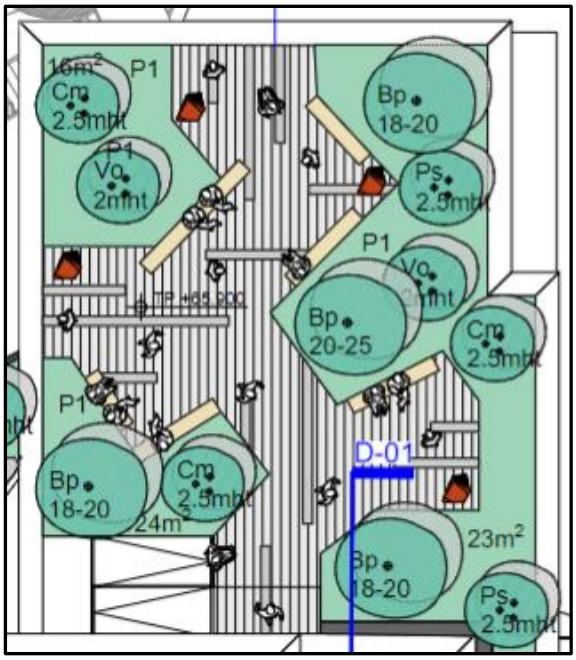

Figure 5.25: Landscape Plan of the External Amenity Space on Nineth Floor Level

(Source: *Landscape Report*, Stephen Diamond Associates)

5.3.6 Cultural / Community Space

The proposed development seeks to provide a total of 1,553 sq m of cultural / community space, divided between internal and external space. The local community and members of the public will be able to use these spaces once and end user is identified. It is considered appropriate to identify an end-use post-planning and once construction has commenced and an operational date is known a user identified today many have found space elsewhere in the c. 3-4 years between now and completion, i.e. securing planning and constructing the development.

The majority of cultural / community space will be located internally, providing 1,422 sq m across the basement and ground floor level, equating to 92% of the total cultural / community space proposed. The remaining 8% will also be provided externally at basement and ground floor level, making up 131 sq m of cultural / community space. Internally, there will be 729 sq m of cultural space and 162 sq m of shared cultural / community space provided at basement level, while there will be 472 sq m of community space and 59 sq m of shared cultural / community space at ground floor level. Externally, there will be 91 sq m of shared cultural / community space provided at basement level, and 40 sq m of community space at ground floor level.

Table 5.4 provides a breakdown of the proposed cultural and community uses, as well as what floor area the space will be located at and the floor area of each use.

Floor	Use		Internal Area (sq m)	External Area (sq m)
Basement	Cultural	Digital Hub	436	-
		Office	41	
		Store / Back of House	193	
		Staff Changing Rooms and Showers	18	
		WC	16	
	Shared Cultural / Community	Accessible Break-Out	162	91
Ground Floor		Reception	59	-
	Community	Café	52	40
		Co-Working Area	86	
		Main Co-Working Area	277	
		Ancillary	41	
		WC	11	
Total			**1,422**	**131**

Table 5.4: Proposed Cultural / Community Uses and Floor Areas

(Source: Design Proposal by KHR Architects)

As illustrated in Figure 5.26 and Figure 5.27 below, all of the cultural / community space will be provided within Block 2 and the internal and external space on each floor are connected with one another via sets of doors. This is to ensure that people using this space are kept in one place and so that they can easily navigate their way around without entering the student accommodation.

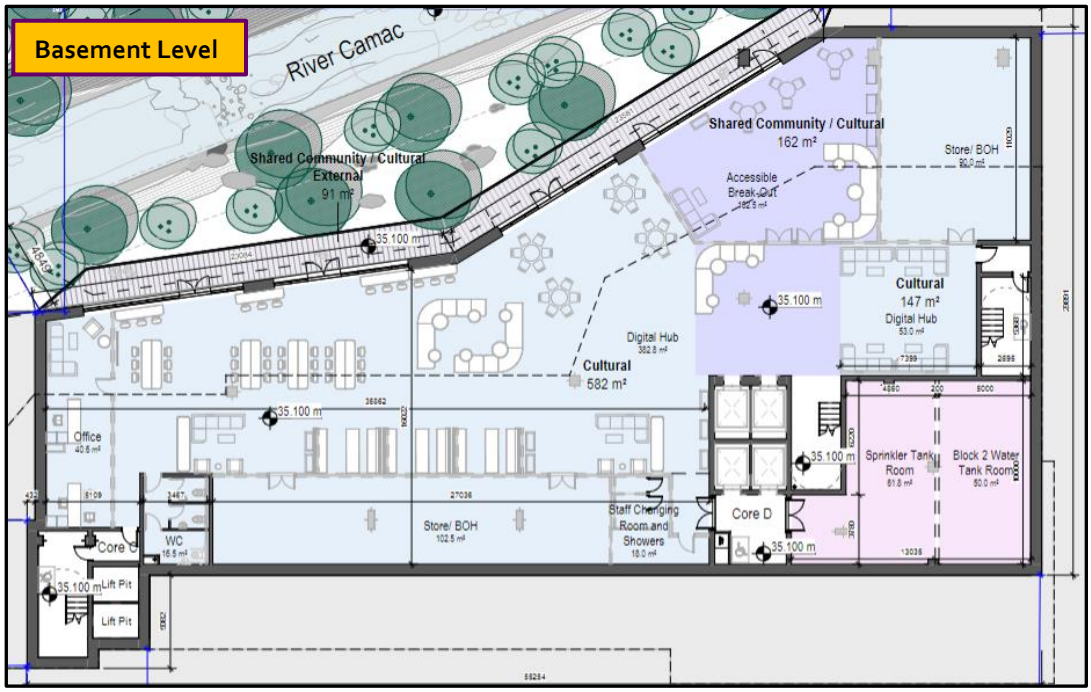

Figure 5.26: Location of the Cultural / Community Space on Basement Level

(Source: 'Basement Floor Plan' by HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)

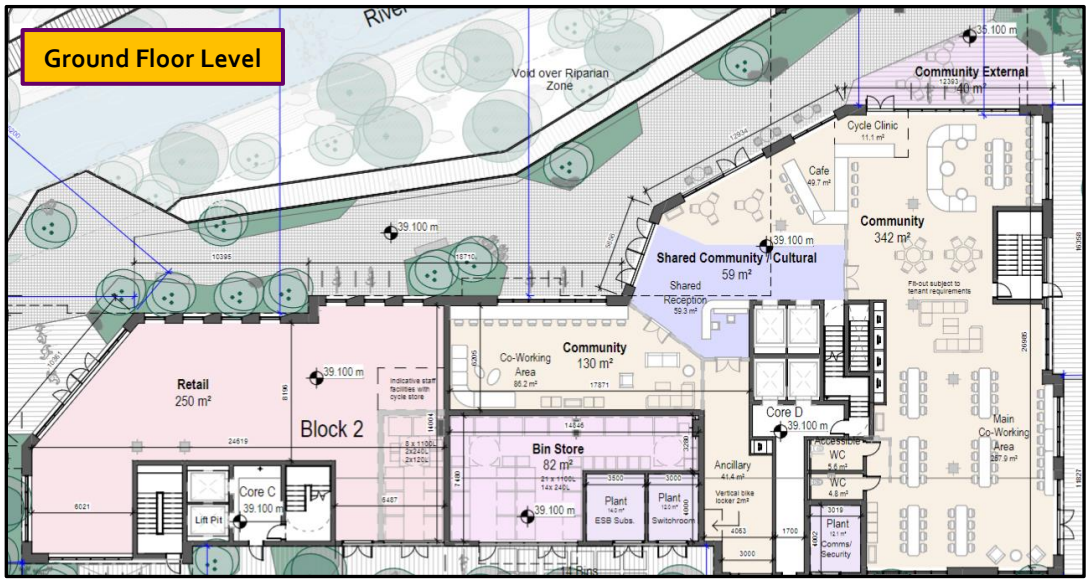

Figure 5.27: Location of the Cultural / Community Space on Ground Floor Level

(Source: 'Ground Floor Plan' by HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)

5.3.7 Retail Unit

The proposed development seeks the provision of a 250 sq m retail unit, that will be located on the ground floor of Block 2. It is hoped at this juncture (subject to securing a tenant) that the retail unit will be used as a shop to serve the needs of the students living in the accommodation, as well as the wider public. As illustrated in Figure 5.28, the retail unit will

be provided to the northernmost part of Block 2, capturing the most footfall as pedestrians traverse the new public realm.

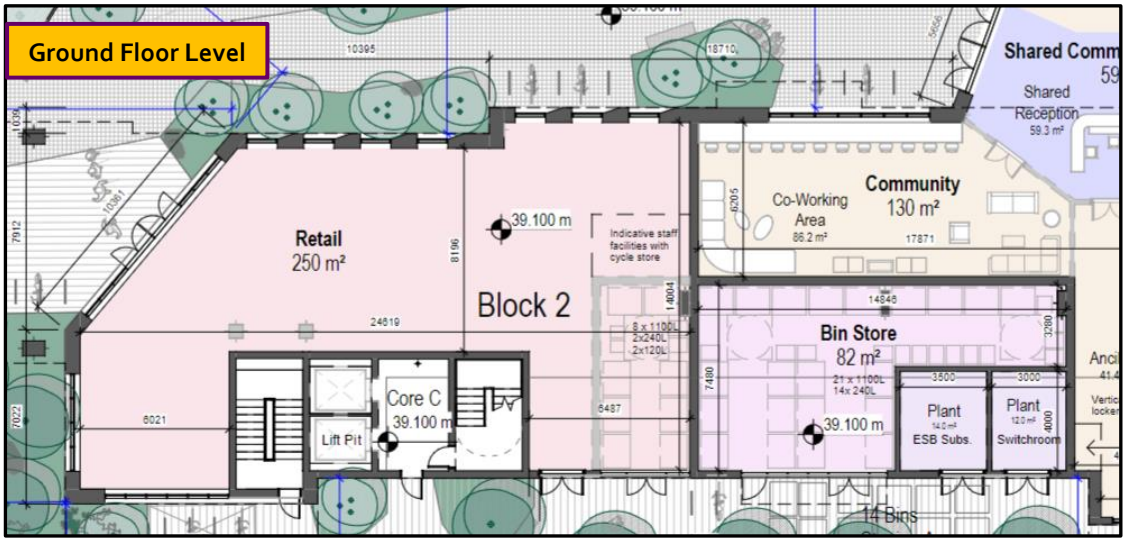

Figure 5.28: Location of the Retail Unit on the Ground Floor of Block 2

(Source: 'Ground Floor Plan' by HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)

5.4 Daylighting the River Camac

As part of the proposed development, it is proposed to reopen a section of the Camac culvert which runs through site from northwest to southeast. The existing culvert comprises a reinforced concrete pipe, approximately 5m in diameter, and at depths varying between 7.5 and 10m below the existing ground level (to the invert level of the culvert). The existing culvert commences at Bluebell cemetery c. 360 metres from the subject site. The culverted river flows from the Bluebell cemetery, across the Naas Road, through the subject site, and extends to the Carriglea Residential Development adjacent to the subject site, before terminating at the boundary of the Carriglea site and returning to an open watercourse towards Lansdowne Valley and Inchicore. The area of the River Camac that is currently culverted is illustrated in Figure 5.29 below, as taken from the *Hydrological Risk Assessment* prepared by AWN Consulting.

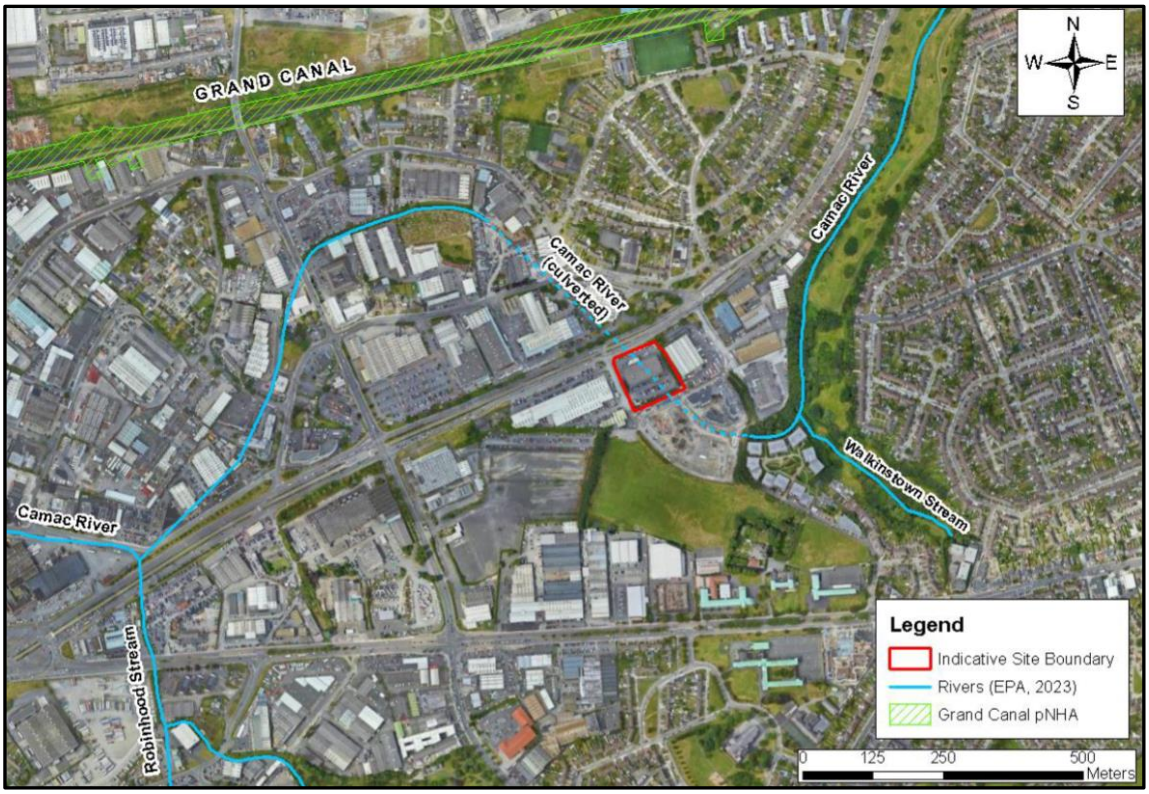

Figure 5.29: Area of the River Camac that is Culverted

(Source: Figure 1.1 of the *Hydrological Risk Assessment* by AWN Consulting)

The river remains culverted at the Carriglea site directly to the south of the site and was not requested to daylight the river at application stage. This application is under construction.

The proposed development, however, seeks to daylight some 76 No. metres of the River Camac in order to open up a unique opportunity to bring green infrastructure and new biodiversity to the current hardstanding nature of the subject site. This will create 1,261 sq m (13% of the site area) of space allocated for the Riparian Zone. The extent to the proposed reopening of the river is illustrated in the submitted Drawing No. GWH-BMD-ZZ-00-DR-C-1005 prepared by Barrett Mahony and Drawing No. 22-579-SDA-PD-DR-XX-207 prepared by Stephen Diamond Associates.

As stated in the *Landscape Report* prepared by Stephen Diamond Associates:

> "*The riparian vegetation along the river will develop on a layered landscape of newly approved imported clean topsoil and subsoil. The existing subsoil free from contaminants on site will be ripped to improve drainage and support plant growth within the Riparian Zone following the excavation to the culvert level and construction.*
>
> *Topsoil will be provided to varying profile depths of approximately 300-600mm depth to facilitate a varied range of native riparian vegetation to comprise groundcover and scrub through to large trees.*
>
> *To establish a softer, more natural corridor that aims to improve the quality of the River Camac, prevent erosion, enhance biodiversity at the river level, conceal and address the straight geometrical design of the existing culvert bed that is retained, a combination of*

grey and green bioengineering solutions are proposed such as rip-rap, gabion mattressing and live willow staking / mattressing."

The bioengineering techniques proposed, as stated in the *Landscape Report,* are as follows:

"*Rip-Rap is the use of crushed stone rock armour along water bodies to prevent mechanical erosion of moving water and aims to trap sediment, reduce the speed of water and gradually build banks along water courses. This technique is proposed for the retained culvert embankments to create a varied naturalesque river profile."*

"*Gabion Mattress on the culvert bed is proposed to enhance the concrete riverbed and to also slow down water as it passes through the channel like the rip-rap. The purpose of introducing the gabion floor is to create favourable conditions for sedimentation with the aim to provide a break within the hard concrete culvert channel and create a naturalistic environment on the bed for various plant and animal species to establish and thrive and potentially create necessary conditions for fish spawing.*

Live Willow Staking and Mattress are proposed to stabilise the embankments through the use of intricate and dense root structures of willow species. The roots will bind the stone in the Rip-Rap with the soil and hold the landscape interventions in place during floods. The difference between live willow staking and matressing is how the dormant live willow rods are initially placed on the ground. Willow stakes are positioned upright and for the willow mattress, a series of parallel rods are laid horizontally and secured with a mesh in place. Willow stakes are proposed at the two openings of the culvert and the mattress in between."

It is evident from the abovementioned and more details provided in the *Landscape Plan* that the daylighting of the River Camac has been extensively considered, in order to better green the subject site, provide new biodiversity to the area, and to provide a visually attractive area for students of the accommodation and visitors of the site. The Riparian Zone will be inaccessible to the students and public and the only access proposed down to the Riparian Zone is for maintenance.

For more details of the daylighting of the River Camac, please refer to the *Civil Engineering Infrastructure & Surface Water Management Report* prepared by Barrett Mahony and the *Landscape Report* prepared by Stephen Diamond Associates.

Figure 5.30: CGIs of Proposed Daylighted River Camac Extending to 76 No. Metres

(Source: CGI by 3D Design Bureau)

5.5 Landscape

The proposed landscape has been designed collaboratively from the offset as an integral element of the proposal. A mixture of hard and soft landscape materials is proposed throughout the subject site, promoting a wide range of flora and fauna, providing a safe and usable space for pedestrians, cyclists, and motorists, as well as the use of permeable materials for rainwater management.

Hard Landscape Materials

The proposed hard landscape materials consist of paving and street furniture. There are 2 No. distinctive paving patterns chosen for the proposed scheme. The first one representing the formal straight forms of the urban setting and architecture of the site through, and the second one reflecting a more informal and fluid paving pattern. Silver slab granite paving will be used for the first paving pattern, while grey granite has been chosen for the second paving pattern in order to achieve a more fluvial form and covey the nature of the flowing River Camac. To manage rainwater on the subject site in a sustainable and responsible manner, a combination of rigid paving and permeable open-jointed paving with SuDS spacers will be integrated throughout.

Silver granite slabs are to be provided for the roof gardens, to match the ones at the lower ground floor levels and will include grey granite bands that contrast the silver granite slab to suggest movement for students throughout the roof gardens and direct them to the key views.

In terms of street furniture, there will be benches, Sheffield bicycle stands, and waste receptables provided throughout the development. As stated in the *Landscape Report* prepared by Stephen Diamond Associates:

> "*Furniture elements and where they are placed are important considerations in terms of how the development landscape will be perceived, places of interest can be indicated by*

the placement of the furniture in that location, views can be emphasised in the same way and so furniture should therefore correspond to places of high amenity value and routes that traverse long distances."

The placement of the street furniture has been carefully considered in the design process, choosing suitable places along public open spaces, as well on external amenity spaces for the students of the accommodation. Benches are scattered strategically throughout the development and provide spaces for people to socialise with one another comfortably siting down. There are 218 No. visitor bicycle parking spaces throughout the development in the form of Sheffield-style bicycle stands, primarily located near doorways. Waste receptacles are provided throughout various open spaces, pathways and building access points.

Soft Landscape Materials

There will be a range of planting used throughout the development, such as trees, ornamental grasses, flowering, and shrubs. The soft landscaping provides a counterpoint to the hard landscaping and built elements, and introduces new colours, smells and biodiversity to the current hardstanding nature of the subject site. The Riparian Zone acts as the green heart from which the flora and fauna emerges and spills out to the entire site.

There are existing trees along the boundary of the subject site, however, as stated in the *Landscape Report,*

"*The existing tree planting is of low ecological value. The proposed planting promotes native species and will provide a greater ecological and aesthetical value to the Gowan site and surrounding areas.*"

Planting along the Naas Road boundary is envisaged to entice people to enter the site and utilise the public open space made available. The type of planting and arrangement of such has been carefully chosen in order to provide a buffer between the busy and hardstanding nature of the Naas Road and the development.

Figure 5.31: Example of Hard and Soft Landscaping

(Source: *Landscape Report* prepared by Stephen Diamond Associates)

5.6 Road Layout & Access

The existing entrance to the subject site is located to the southwest corner, which is accessed from the Naas Road via a signalized junction and Carriglea Industrial Estate Road. The submitted *Civil Engineering Infrastructure & Surface Water Management Plan* prepared by Barrett Mahony sets out the proposed new access:

> "*It is proposed that the access point at the southwest corner of the site will be maintained to cater for all vehicular traffic associated with the proposed development, though it is not envisaged that there will be a significant quantum of vehicular traffic. 7 No. car spaces are being provided, and these will cater for the student residential, commercial retail and cultural / community areas*."

If fire tender vehicles need to access the site they can do so via the main entrance point, travel along the south and eastern boundary and then down to the Central Plaza area to manoeuvre back the way it came. Bollards will restrict any other vehicles from entering the Central Plaza and will only be let down for fire tender vehicles.

Access for pedestrians will be provided directly onto Naas Road via a footpath to the northwest, while cyclists will be able to access the site via a new ramped accesses off the Naas Road. As stated in the *Civil Engineering Infrastructure & Surface Water Management Plan* prepared by Barrett Mahony:

> "*It is proposed that pedestrians accessing or leaving the site will be permitted to enter or exit directly onto the Naas Road footpath to the northwest, providing good connectivity to the surrounding areas. Connectivity will also be provided through the adjacent Carriglea Residential Development, facilitating pedestrians travelling southeast towards Drimnagh Castle. It is proposed to realign the existing footpath along the outbound carriage of the Naas Road, to provide a continuous, unimpeded 2m wide path for pedestrians. The realignment is proposed to cater for a potential future cycle lane along the Naas Road, as part of the Naas Road – Inchicore Active Travel Route. A new signalized pedestrian crossing of the access road at the junction with the Naas Road is proposed, similar to the crossing which was permitted as part of the Concorde SHD development planning application.*
>
> *Following discussions with Dublin City Council Transportation Planning, it is proposed that cyclists will enter the site from the access road to the west of the development, via the main junction with the Naas Road. New cycle lanes will be provided in both directions along the access road. A new cyclist waiting area will be provided at the junction with the Naas Road for cyclists wishing to turn right or left. A Smart Micro Detection System will be provided at the junction to prevent excessive waiting times for cyclists planning to join the Naas Road.*"

These works are proposed outside the Applicant's ownership; however, a letter of consent has been dated and signed by Dublin City Council, and attached as Appendix A to this Planning Report, which allows said works to be undertaken.

5.7 Works Proposed Outside the Main Site Area

5.7.1 Western Boundary

Works to upgrade the access road to the west of the subject site on an area measuring c. 816 sq m (0.081 Ha) are proposed as part of the development scheme. The road provides access for the subject site, the Concorde site, and the Carriglea site. It is envisioned that the upgrading of the road will provide a safer environment for future residents and visitors of the proposed development and the adjacent sites.

The upgrades to the road will comprise the following:

- New surfacing to the carriageway;
- Inbound and outbound bicycle lanes from the development entrance to the Naas Road;
- A controlled pedestrian crossing on the access road at the Naas Road junction; and
- An uncontrolled pedestrian and bicycle crossing linking the subject site with the Concorde development to the west of the site.

The *Civil Engineering Infrastructure & Surface Water Management Report* prepared by Barrett Mahony Consulting Engineers states the following in relation to the proposed upgrades to the western access road:

> "*Following discussions with Dublin City Transportation Planning, it is proposed that cyclists will enter the site from the access road to the west of the development, via the main junction with the Naas Road. New cycle lanes will be provided in both directions along the access road. A new cyclist waiting area will be provided at the junction with the Naas Road for cyclists wishing to turn right or left. A Smart Micro Detection System will be provided at the junction to prevent excessive waiting times for cyclists planning to join the Naas Road.*"

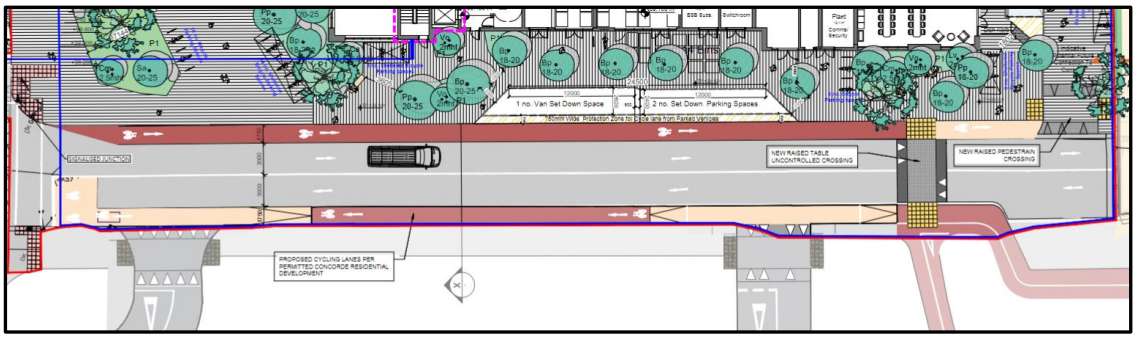

Figure 5.32: Upgrades Proposed to the Western Access Road of the Subject Site

(Source: 'Ground Floor Masterplan' by Stephen Diamond Associates)

5.7.2 Naas Road

Works are also proposed along the Naas Road to the north of the subject site, on an area measuring c. 862 sq m (0.086 Ha) to provide direct linkages to the site and safe infrastructure for pedestrians and cyclists. Currently, the subject site does not provide any direct access onto Naas Road, with the only access located to the southwest corner of the site. Connectivity and permeability are key aspects of the proposed development to increase

socialisation and inclusivity amongst students and members of the public. Therefore, the following works are proposed along the Naas Road in order to achieve these key aspects:

- Realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road;
- Linkages from the realigned footpath to the subject site;
- New controlled pedestrian crossing across the eastbound and westbound carriages of the Naas Road; and
- New uncontrolled crossing of the Luas tracks.

The *Civil Engineering Infrastructure & Surface Water Management Report* prepared by Barrett Mahony Consulting Engineers states the following regarding the works to the pedestrian footpath:

> "*It is proposed that pedestrians accessing or leaving the site will be permitted to enter or exit directly onto the Naas Road footpath to the northwest, providing good connectivity to the surrounding areas. Connectivity will also be provided through the adjacent Carriglea Residential Development, facilitating pedestrians travelling southeast towards Drimnagh Castle. It is proposed to realign the existing footpath along the outbound carriage of the Naas Road, to provide a continuous, unimpeded 2m wide path for pedestrians. The realignment is proposed to cater for a potential future cycle lane along the Naas Road, as part of the Naas Road – Inchicore Active Travel Route. A new signalized pedestrian crossing of the access road at the junction with the Naas Road is proposed, similar to the crossing which was permitted as part of the Concorde SHD development planning application.*"

The *Residential Travel Plan* prepared by Barrett Mahony Consulting Engineers states the following regarding the proposed new pedestrian crossing of the Naas Road and Luas tracks:

> "*The new crossing will facilitate residents of the proposed development who will be looking to utilise public transport from the north side of the Naas Road. It will also provide better pedestrian linkages for residents to travelling north from the development.*
>
> *The proposed layout of the new crossing has been reviewed with Dublin City Council, who also provided feed-back from Transport Infrastructure Ireland. All comments from both DCC and TII were incorporated into the design as shown on BMCE drawing GWH-BMD-ZZ-XX-DR-C-1012*".

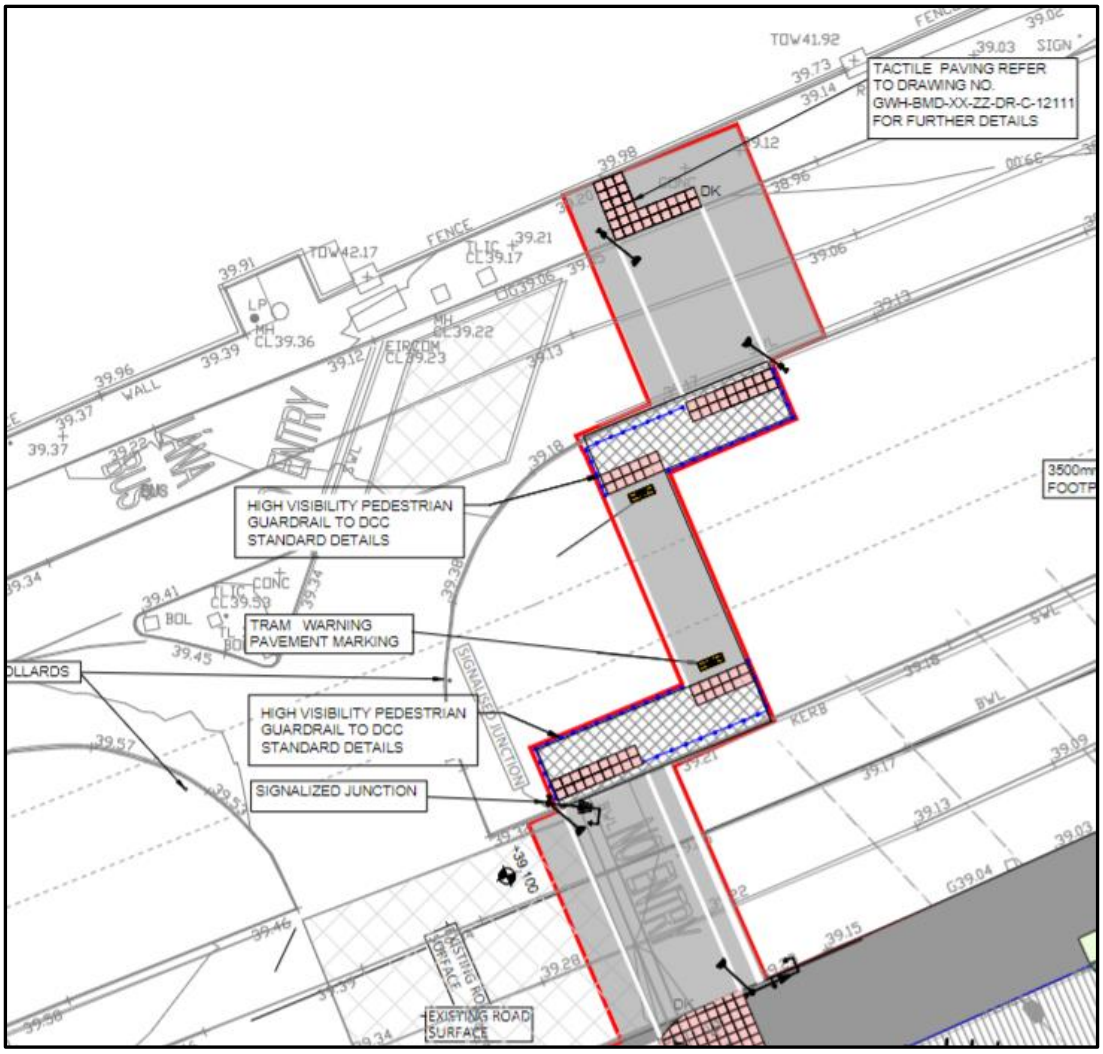

Figure 5.33: Upgrades Proposed Along the Naas Road

(Source: 'GWH-BMD-ZZ-XX-DR-C-1012' by Barrett Mahony Consulting Engineers)

5.8 Car & Bicycle Parking

As discussed herein, the proposed number of car parking spaces is resultant from the subject sites' prime location to high-transport options (i.e. numerous bus routes and the Luas). The 7 No. car parking spaces will be separated in three main areas of the site, with 3 No. spaces to the southeast, 1 No. space to the east, 1 No. space to the northeast, and 2 No. accessible spaces to the southwest.

Additional to the 7 No. car parking spaces, there will be 2 No. set down areas to be provided, the first located alongside the retail space to the west, and the second located alongside the 2 No. accessible spaces to the southwest. At the beginning of the college year, when it is expected to be busy with heavy traffic, the bin staging area will be made available to use as a temporary set-down area. There will also be 2 No. motorcycle parking spaces located along the eastern part of Block 1.

The proposed development will include a total of 1,162 bicycle parking spaces, with 944 No. spaces provided for the student accommodation and 218 No. spaces provided for visitor parking. The student bicycle spaces will be located in the bicycle store in Block 1, with the

lower ground floor providing 460 No. spaces and the ground floor providing 481 No. spaces. There are 5 No. cargo bike spaces provided within the 481 No. spaces on the ground floor. There is 1 No. space provided internally via a vertical cycle stand for the retail unit and 2 No. vertical cycle stands for the cultural and community space which will be dedicated to staff. The 218 No. visitor bicycle parking spaces will be provided externally throughout the development in the form of Sheffield-style bicycle stands, primarily located near doorways. Staff of the development will also be able to use these external cycle stands.

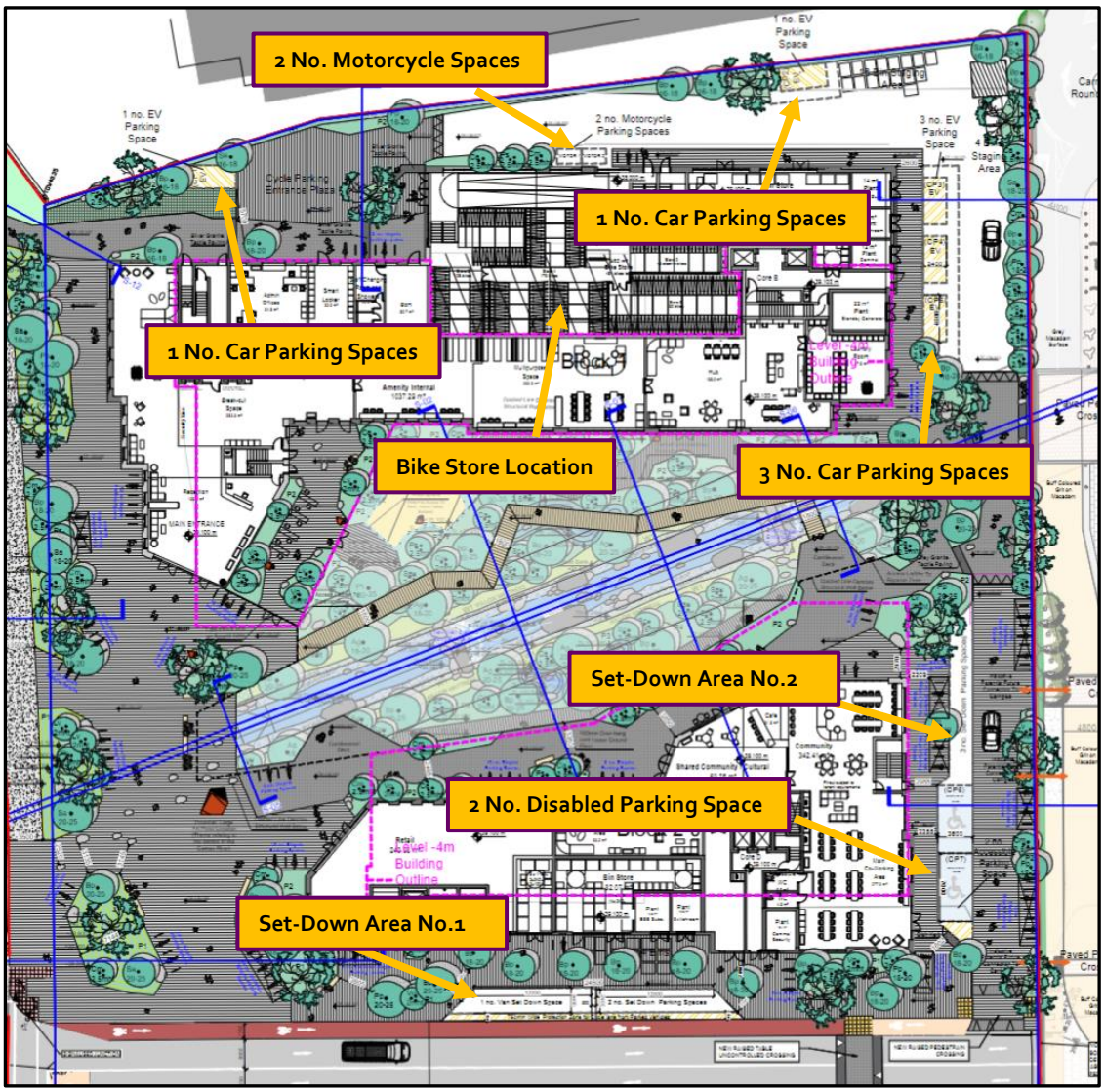

Figure 5.34: Location of the Car & Cycle Parking Spaces

(Source: 'Ground Floor Masterplan' by Stephen Diamond Associates, Annotated by Thornton O'Connor Town Planning, 2023)

5.9 Temporary Use as Tourist Accommodation

Due to the length of a standard college year, running from September to May, it is proposed that the student accommodation will provide tourist accommodation principally during the summer months when students leave to go back home for the summer. This will ensure that the activity and vibrancy resultant of the students during the college year will continue during the summer

months. Given the site's location, it is anticipated that summer lets will be to international language students as opposed to families for example.

The provision of tourist accommodation for international language students will contribute to the dearth of supply of such accommodation during the summer months. Like with the student accommodation rates, it is anticipated that these will be less than City Centre locations, thus the scheme seeks to provide 'accommodation for all'.

6.0 STATEMENT OF CONSISTENCY - NATIONAL POLICY CONTEXT

This section will demonstrate that the proposed development has been designed with due consideration of National Policy and is consistent with the policy and objectives of the respective policy documents. The following National Policy documents are discussed in this section:

1. *Project Ireland 2040: The National Development Plan 2021-2030;*
2. *Project Ireland 2040: National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
4. *Housing for All – a New Housing Plan for Ireland, September 2021;*
5. *National Student Accommodation Strategy (2017);*
6. *Guidelines on Residential Developments for 3rd Level Students (1999);*
7. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
8. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007);*
9. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009);* and
10. *The Planning System and Flood Risk Management (2009).*

6.1 Project Ireland 2040: The National Development Plan 2021 – 2030

The *National Development Plan 2021-2030 ("NDP")* document was published in 2021 as an updated version of the previous *National Development Plan 2018-2027*.

As part of *Project Ireland 2040,* the *NDP* sets out the Government's over-arching investment strategy and budget for the period 2021-2030. It is an ambitious plan that balances the significant demand for public investment across all sectors and regions of Ireland with major focus on improving the delivery of infrastructure projects to ensure speed of delivery and value for money.

The *NDP* sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in *Housing for All* and will enable a step-change in investment to ameliorate the effects of climate change. The *NDP* underpins the overarching message of the *National Planning Framework* ('*NDP*').

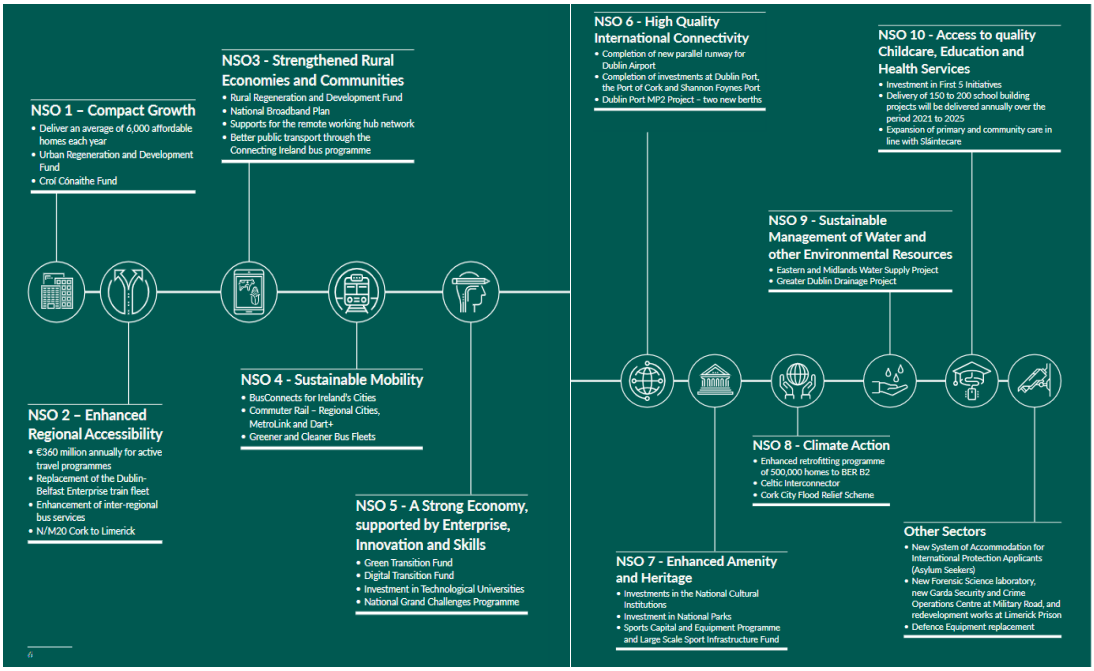

Figure 6.1: Major Investments – National Strategic Outcomes

(Source: *National Development Plan 2021-2030)*

The *NDP* has 10 No. National Strategic Outcomes, with the relevant strategic outcomes and objectives discussed in section 6.2.2 of this report.

6.1.1 National Strategic Outcome No. 4: Sustainable Mobility

The NPO No.4 relates to Sustainable Mobility in the *NDP*, which looks at future investment towards active travel and public transport networks in Ireland in order to improve people's quality of life while enabling the *National Planning Framework's* commitment toward compact growth of cities, towns and villages and their existing urban footprint. One of the ways Ireland's travel and transportation sector will grow sustainably is through the 'BusConnects' initiative. The *NDP* sets out the vision for BusConnects:

> "*BusConnects will overhaul the current bus system in all five cities by implementing a network of 'next generation' bus corridors (including segregated cycling facilities) on the busiest routes to make journeys faster, predictable and reliable. BusConnects will enhance the capacity and potential of the public transport system by increasing and replacing the bus fleets with low emission vehicles and introducing a new system of ticketing known as Next Generation Ticketing and cashless payments. Increasing the attractiveness of the bus systems in the cities will encourage modal shift away from private car use, leading to a reduction in congestion and associated costs in the major urban areas. Over the lifetime of this NDP, there will be significant progress made on delivering BusConnects with the construction of Core Bus Corridors expected to be substantially complete in all five cities by 2030.*"

As discussed in Section 2.3.2.2. previously, the subject site will benefit from 2 No. routes passing by or in close proximity to the subject site. Both routes will be servicing third level institutions in particular one of the routes will be able to bring students right into University College Dublin, while the other route will be able to provide stops in walking distance to colleges and schools in the City Centre.

6.2 Project Ireland 2040: National Planning framework ('*NPF*')

6.2.1 Introduction

Project Ireland 2040: National Planning Framework ('*NPF*') is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country.
The *NPF* is a long-term Framework that sets out how Ireland can move away from the current 'business as usual' pattern of development.

As set out in Section 6.6 of the *NPF*, a core principle of the *NPF* is to:

> *"Allow for choice in housing location, type, tenure and accommodation in responding to need"* in addition to tailoring *"the scale and nature of future housing provision to the size and type of settlement where it is planned to be located."*

In addition, Section 6.6 also illustrates the struggles of the supply and demand of PBSA and how this is must be addressed:

> *"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****."* [Our Emphasis]

The *NPF* expressly seeks the densification of infill sites close to public transport and services and facilities, such as the subject site. National Policy Objective 35 states that it is an objective to:

> '*Increase residential density in settlements, through a range of measures including reductions in vacancy****, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights****.'* [Our Emphasis]

As set out in Section 2.2 of the *NPF*, a core principle of the *NPF* is to achieve '*Compact Growth'*:

- *Targeting a greater proportion (40%) of future housing development to be* ***within and close to the existing 'footprint' of built-up areas****.* [Our Emphasis]
- ***Making better use of under-utilised land and buildings, including 'infill'****, 'brownfield' and publicly owned sites and* ***vacant and under-occupied buildings****, with* ***higher housing*** *and jobs* ***densities****, better serviced by existing facilities and public transport'.* [Our Emphasis]

The *NPF* also sets out the following regarding future growth needs in Section 6.6:

> *"Historically, low-density housing development has been a feature of Ireland's housing landscape in cities, towns, villages and the countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands,* ***increased residential densities are required in our urban areas.***

[....]

To more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that ***we need to build inwards and upwards, rather than outwards.*** *This means that apartments will need to become a more prevalent form of housing, particularly in Irelands cities."* [Our Emphasis]

The *NPF* recognises that building inwards and upwards is important to effectively address the housing crisis with PBSA being an important tenet of housing. Therefore, we consider that there is a significant importance placed in the *NPF* to develop high quality accommodation by increasing the density of developments in Dublin.

The acceptability of taller buildings in this location, which has access to the highest quality public transport has already been deemed acceptable with an 18 No. and 15 No. storey developments already granted in vicinity (DCC Reg. Ref. 4238/19 & 3228/20) and 10 No. storeys directly adjacent on the Concorde site.

In our professional planning opinion, the *NPF* supports the provision of the proposed PBSA development through increased density and height at the subject site having regard to the location of the site beside high quality public transport providing easy accessibility around the City for future residents, the high-quality design of the development, its proximity to local amenities and facilities and the express requirement of national policy to increase height and densities.

6.2.2 National Strategic Outcomes and Objectives

The *NPF* identifies a list of 10 No. National Strategic Outcomes which set out the vision of the *NPF* (to create a single vision and a shared set of goals for every community across the country) as follows:

1) Compact Growth;
2) Enhanced Regional Accessibility;
3) Strengthened Rural Economies and Communities;
4) Sustainable Mobility;
5) A strong Economy supported by Enterprise, Innovation and Skills;
6) High Quality International Connectivity;
7) Enhanced Amenity and Heritage;
8) Transition to a Low Carbon and Climate Resilient Society;
9) Sustainable Management of Water, Waste and other Environmental Resources; and
10) Access to Quality Childcare, Education and Health Services.

A number of key National Policy Objectives ("*NPOs*") have been identified throughout the *NPF* in order to successfully deliver the 10 No. Strategic Outcomes. The NPO 74 states that proposals should "*secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.*". The table below sets out how the proposed development will contribute towards achieving the 10 No. NSOs identified in the *NPF.*

No.	Objective:	How it is Addressed by this Development:	Does it meet the criteria:
1	Compact Growth	Sustainable and efficient use of underutilised infill lands in an existing urban area to provide a student accommodation scheme which will contribute positively towards addressing the acknowledged deficit in PBSA.	Yes
2	Enhanced Regional Accessibility	Located within comfortable walking distance to public transport that leads to Higher Education Institutions and Employment, as well as access to the services and social infrastructure of Dublin City and beyond.	Yes
3	Strengthened Rural Economies and Communities	N/A – Urban Area	N/A
4	Sustainable Mobility	The site lies within metres of the Bluebell Luas Stop providing easy access into the City Centre to facilities in the City or to further public transport to institutions like UCD for example. The proposed BusConnects when introduced will offer students of the future accommodation various bus routes with a high frequency schedule and a fleet of low and zero emission urban buses which will in turn contribute to a cleaner and more liveable city by reducing noise and air pollution. One of these proximate routes will provide direct access to UCD. 1,159 No. of bicycle spaces are proposed to encourage students to cycle to local facilities and services with separate cycle parking provided for the cultural/community and retail areas.	Yes
5	A Strong Economy supported by Enterprise, Innovation, and Skills	The proposed development will support the employment of a highly skilled workforce during the construction phase of development that will ultimately contribute to a strong economy. Post-construction will also see the employment of staff needed to run the student accommodation. The retail, community and cultural spaces will provide students with part-time work and local residents with part / full-time work, further contributing towards strengthening the local economy and the regeneration of the surrounding area.	Yes

		The future students will also likely secure part time jobs in the local area contributing further to the local economy.	
6	High Quality International Connectivity	N/A – Relates to Ports and Airports	N/A
7	Enhanced Amenity and Heritage	Communal spaces will be provided in the form of amenity space for students of the accommodation to utilise and enjoy. This includes amenity space on basement level, ground floor, first floor, second floor and nineth floor. The scheme also provides public open space in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway above the Riparian Zone. Gowan House is not of architectural heritage significance. Located near the subject site is Naisetra, a Protected Structure, however, the *Architectural Heritage Impact Assessment* prepared by Historic Building Consultants concluded that the Protected Structure is well screened, and the proposed development will have no appreciable effect on the setting of the Protected Structure.	Yes
8	Transition to a Low Carbon and Climate Resilient Society	The proposed development will be subject to detailed design which prioritises the energy performance of the building. A *Climate Action, Energy & Sustainability Report* prepared by Delap and Waller details the strategy to address various climate mitigation actions in the built environment. The proposed development has been designed in line with the principles of the energy hierarchy – Be Lean, Be Clean & Be Green. This ensures the development prioritises passive measures which reduces carbon, balances high quality daylight while ensuring thermal comfort is maintained year-round via mixed mode ventilation and passive fabric specification. Construction materials used will be sourced from manufacturers with EPBD certification, encouraging the use of materials with high percentage of recycled content. The development aims to achieve the recommended Whole Life Cycle Carbon levels outlined in RIBA. The location of the subject site benefits from the close proximity of the Bluebell Laus stop	Yes

		serving the Red Line route as well as various bus stops in the vicinity. As the proposed development seeks to reduce private car use by only providing 7 No. car parking spaces on site, students, staff and visitors will be encouraged to use the various public transport options available instead, thus reducing carbon dioxide emissions associated with private car usage.	
9	Sustainable Management of Water, Waste and other Environmental Resources	Please see enclosed the Operational Waste Management Plan prepared by AWN and the *Climate Action, Energy & Sustainability Statement* prepared by Delap & Waller. Sustainable management of energy use, management of water use and waste output are detailed in the accompanying reports. Sustainable modes of transport are encouraged with the limited number of car-parking spaces proposed.	Yes
10	Access to Quality Childcare, Education, and Health Services	The proximity of the subject site to public transport will connect students to Higher Education Institutes easily. Ballyfermot and Inchicore Colleges of Further Education are within c. 2.5 km of the subject site, whilst TUD Tallaght and Trinity College for example is very easily accessed by the red line Luas. Crumlin Hospital, Cherry Orchard Hospital and St. James's Hospital are all located nearby providing easily accessible accommodation for student nurses and doctors.	Yes

A number of key NPOs have also been identified throughout the *NPF* in order to successfully deliver the 10 No. Strategic Outcomes outlined above. We have carried out an assessment of the NPOs identified in the *NPF* and have identified the relevant objectives that are applicable to the proposed student accommodation development.

The relevant NPOs that are applicable to the proposed development are discussed under the following headings:

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;
- Scale, Massing and Design;
- Justification and Housing Need;

- Waste and Environmental Issues; and
- Implementing the National Planning Framework.

6.2.2.1 Population Growth and Employment

The *NPF* sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the five main cities. The following objectives are considered to be most applicable to the residential development subject of this report:

- **National Policy Objective No. 1b** projects an additional 490,000 – 540,000 No. people in the Eastern and Midlands Region.

- **National Policy Objective No. 2a** sets a target of 50% of future population and employment growth to be focused in the existing five cities and their suburbs.

- **National Policy Objective 3a** aims to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

- **National Policy Objective 3b** aims to 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.

- **National Policy Objective No. 4** aims to provide diverse and integrated communities ensuring the creation of attractive, liveable, well designed, high quality urban places.

- **National Policy Objective No. 5** aims to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

- **National Policy Objective No. 6** seeks to regenerate and rejuvenate cities, towns and village of all types and scale that can accommodate the increased residential population and employment activity.

- **National Policy Objective No. 35** supports increased residential density in settlement through infill development schemes, area or site-based regeneration and increased building heights.

The proposed development will facilitate student accommodation bedspace requirements in the region identified in NPO 1b and 1c. Section 2.5 of the *NPF* outlines that that compact development is the preferred approach which would focus on:

> ***"Reusing previously developed, 'brownfield' land**, building up infill sites, which may not have been built on before and either reusing or **redeveloping existing sites** and buildings."* [Our Emphasis]

The proposed development is located on an entirely underutilised site in a core urban location. The subject site is eminently suitable for Student Accommodation given the proximity to public transport options for students to travel to multiple colleges or schools as well as the facilities within cycling or walking distance including Ballyfermot and Inchicore

Colleges of Further Education and a number of nearby hospitals where student nurses and doctors will be required to train.

Although the scheme is student accommodation, it is our opinion that the proposed development is consistent with NPOs 2a, 3a and 3b which aim to provide for 50% of future population and employment growth within the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints. The provision of this accommodation will increase the quantum of available private rented accommodation in the City.

The scheme will include communal amenity spaces for the students to utilise and external communal amenity space in addition to the public spaces that will be made available for the wider public. These high quality, attractive and liveable spaces will ensure the residents have the opportunity to interact with each other (and the public in the public open spaces and community and cultural spaces) ensuring an integrated community within the scheme in accordance with NPO 4. NPO 4 also seeks the provision of **diverse communities** and all of the recently permitted/under construction schemes are apartment units, thus the subject development proposes a diverse type of residential accommodation and will introduce a diverse younger student population into the area.

The scheme will appropriately densify the subject site in accordance with NPO5 which aims to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

The addition of 941 No. student bedspaces constitutes a significant investment in an underutilised brownfield site within the existing built-up area. Rather than continuing the sprawl of city development, the subject scheme adds student bedspaces in close proximity to multiple public transport options and has been designed to ensure an appropriate densification of an underutilised site, in accordance with the preferred approach of the *NPF*. The proposed development is consistent with the NPOs set out within this Section.

6.2.2.2 Current Trends in Tenure and Household Formation in Ireland

The development of PBSA has expanded in recent years and has helped to alleviate some demand on the rental sector nationally. It has also been a successful landing pad for migrating students within the county as well as international students entering a competitive rental market. The *NPF* acknowledges that Ireland needs to invest in human capital in order to achieve a "*strong economy supported by Enterprise, Innovation and Skills."*

In Section 6.5 of the *NPF* the following is stated under the heading *'Education'* in relation to investment in Higher Education Institutions ('HEIs'):

> *"In the Higher Education sector, the development of Technological Universities has the potential to deliver greater opportunity to students in the regions served, to staff working in the institutions, and to the broader local economy and society. By creating institutions of scale and strength, multi-campus technological universities will bring greater social and economic benefits to their regions through a strengthened role in research and innovation and the delivery of a broad range of high-quality education and training in each of their campuses."*

As the State and HEIs understand that investment must be made to expand their campus facilities to meet future changes in the economy and increased demand for student

accommodation, similarly the private sector is expected to provide for the additional capacity in existing and new student accommodation. The location of off-campus PBSAs therefore benefits from strong site selection and proximity to Higher Education, employment, and strong urban settlements with the infrastructure, amenities and social infrastructure to support additional population.

National Policy Objective 31 states the following:

> "*Prioritise the alignment of targeted and planned population and employment growth with investment in:*
>
> - *A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities.*
> - *The provision of early childhood care and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations.*
> - ***The expansion and consolidation of third level facilities at locations where this will contribute to regional development.***
> - *Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified."* [Our Emphasis]

This means that cities like Dublin, with the strongest higher education sector in Ireland will play a key role in delivering further consolidated expansion of its Institutions and Universities. This growth and expansion will result in an increased demand on student accommodation. In relation to the correlation between demand for student accommodation and the knock-on effect on supply of the rental market, the *NPF* states that:

> *"Demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas in particular. In the years ahead, student accommodation pressures are anticipated to increase.* ***The location of purpose-built student accommodation needs to be as proximate as possible*** *to the centre of education,* ***as well as being connected to accessible infrastructure such as walking, cycling and public transport****. The National Student Accommodation Strategy supports these objectives." (Pg. 95)* [Our emphasis added.]

In providing for this need, student accommodation will become a more prevalent typology where there is the demand and infrastructure to support it. In turn this can aide in consolidating population density and catering to the specific lifecycle needs of students within supportive environments and established communities. Therefore, the provision of 941 No. student accommodation bedspaces within a suitable location to excellent public transport options with routes to various schools and colleges, is in line with the objectives of the *NPF*.

National Policy Objective 35 states the following:

> "*Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes,* ***area or site-based regeneration and increased building heights****."* [Our Emphasis]

The proposed development is in accordance with NPO35 as it represents site-based regeneration of underutilised lands and provides increased building heights.

Although 'digs' type accommodation has declined in recent years, there is a recognised freedom and developmental threshold for students to branch out on their own and live in accommodation during their studies. Due to economic hardship, increased housing costs and a decrease in available supply, the overall '*college experience'* has been diminished, and the longer commuting patterns of students from home which has developed as a result has had a damaging effect on their quality of life.

PBSA should be well placed to provide additional capacity, sustainable and accessible facilities proximate to Higher Education and high-quality public transport and to increase its provision of amenity.

The following objectives respond to the changing nature of household formations and trends in tenure seen in current planning discourse.

- **National Policy Objective 6** acknowledges the changing role and function of settlements of all scales in terms of their residential population, employment, levels of amenity and design quality and their impact on the need to regenerate and rejuvenate the surrounding area.

- **National Policy Objective 11** states that there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages.

- **National Policy Objective 32** has a target of delivering 550,000 No. additional households to 2040.

In accordance with NPOs 6,11 and 32, the proposed development will rejuvenate this site and will provide much needed PBSA in Dublin. As one of the 5 No. centres of growth within the NPF, the Dublin City region is also a location for significant investment in higher education and highly skilled parts of the economy which co-locate with Universities and Colleges. The further expansion of Higher Education Institutes (HEIs) within Dublin will require a quantum of off-campus student accommodation which can provide additional supply to compliment this growth. Therefore, the proposed additional 941 No. bedspaces is in line with National Planning Objectives of the NPF which recognises the changing role and function of settlements.

6.2.2.3 Sustainable Modes of Transport

The *NPF* sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered to be most applicable to the student accommodation development subject of this report:

- **National Policy Objective 26** outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with planning policy.

- **National Policy Objective 27** aims to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

The subject site is bounded to the north by Naas Road, providing safe and direct pedestrian links to local services and facilities. The location of the nearest bus stop is in close proximity to the subject site, only c.150 metres away. With other bus stops in proximity to the site, the bus routes provide substantial options to travel into Dublin City Centre. The closest Luas stop to the subject site is Bluebell Luas Stop, located c. 150 metres to the east of the subject site, or a c.2-minute walking distance. Other nearby Luas stops are Kylemore and Blackhorse, both less than a kilometre from the subject site. The Line that serves this Luas stop is the Red Line which provides access between Connolly Station or The Point to either Saggart or Tallaght.

The strategic location of the subject site provides for an accessible and well-connected location which helps to support sustainable transport patterns. The development will also include attractive open spaces which will encourage students to engage in regular physical activity. The proposed development is consistent with NPOs 26 and 27 as set out above.

6.2.2.4 Scale, Massing and Design

The *NPF* sets out a number of planning policy objectives that specifically relate to the Scale, Massing and Design of developments. The following objectives are considered to be most applicable to the mixed-use development at the subject site.

- **National Policy Objective 13** outlines that to achieve well-designed high-quality outcomes an array of standards will be put in place such as building height and car parking.

- **National Policy Objective 33** states residential development at appropriate scales within sustainable locations will be prioritised.

- **National Policy Objective 35** stipulates the requirement for an "i*ncrease in residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings,* ***infill development schemes, area or site based regeneration and increased building heights.***" [Our Emphasis]

The proposed scheme seeks to provide an increased density in an appropriate location adjacent to a range of services and facilities. The scheme will result in a high-quality architectural design, which has been informed by the surrounding existing context, and appropriately densifying an underutilised site.

The subject site forms part of a very low density under-scaled office/warehouse site and ancillary car park. The proposed development seeks to appropriately densify the subject site through increased height and scale. The height of the proposed development will provide heights of part 2 No. storeys to part 15 No. storeys above lower ground floor and basement level at Block 1 and part 9 No. storeys to part 11 No. storeys above basement level at Block 2, which has been designed in the context of the surrounding height of permitted development (built-out or granted planning permission). The subject scheme has been designed to ensure limited impact on the amenity of surrounding properties, acknowledging that the site forms part of a large regeneration area where some impacts will occur.

Despite the proposed increase in height, it has been demonstrated in the accompanying documentation, particularly the Landscape and Visual Impact Assessment, that the subject scheme will not have a significant material impact on the amenity of surrounding properties.

6.2.2.5 Waste and Environmental Issues

The *NPF* sets out a number of planning policy objectives that specifically relate to Waste and Environmental issues. The following objectives are considered to be most applicable to the proposed development of this planning application:

- **National Policy Objective 52** sets out that the planning system must respond to the environmental challenges and have regard for to relevant environmental legislation.

- **National Policy Objective 54** aims to reduce the nations carbon footprint by integrating climate action into the planning system.

- **National Policy Objective 56** sets out the intentions for sustainably managing waste.

- **National Objective 57** identifies specific objectives to enhance water quality and resource management.

- **National Policy Objective 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.

- **National Policy Objective 60** outlines the importance to appropriately conserve and enhance the natural and cultural heritage of Ireland.

- **National Policy Objective 63** is in regard to the management and conservation of water resources and water services infrastructures.

- **National Policy Objective 64** sets out to "*Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.*"

- **National Policy Objective 65** supports the aims of the Environmental Noise Regulations.

- **National Policy Objective 75** stipulates that "*all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.*"

The subject site is a key underutilised site ideally located for student development given its proximity third level facilities and public transport options with routes provided to various colleges and schools.

The proposed scheme has had regard to relevant environmental legislation as set out in the enclosed reports in accordance with NPO 52. The redevelopment of the subject site will provide a population in close proximity to public transport and will encourage walking and cycling, in accordance with NPO 54 and NPO 64 which sets out to improve air quality through promoting development that facilitates sustainable modes of transport.

The redevelopment of the site will also enhance the streetscape along Naas Road which will positively contribute to the surrounding area by enhancing passive surveillance and legibility for the area. The development will also contribute to the green infrastructure of the city by removing the existing hard standing site and providing high-quality landscaping within the redevelopment (NPO 58) including importantly the daylighting of the River Camac which will provide significant biodiverse improvements to the site.

The scheme provides 7 No. car parking spaces for the scheme and 1,159 No. bicycle parking spaces for students will be provided with further cycle spaces provided for the retail/cultural and community uses. By providing a low number of car parking, the subject scheme seeks to encourage future residents to either walk, cycle or use public transport to travel to the City Centre and all of the amenities contained therein or to nearby educational facilities including TUD Tallaght and the Ballyfermot and Inchicore Colleges of Further Education. Therefore, the subject scheme will contribute to consolidated growth and the reduction in carbon emissions. The proposed scheme will promote sustainable modes of transport resulting in a lower carbon footprint and will be consistent with NPO 54.

The proposed development is supported by the following documents which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues, particularly in accordance with NPO 63, 65 and 75:

Appropriate Assessment Screening Report prepared by Enviroguide Consulting;
Environmental Impact Assessment Screening Report prepared by Enviroguide Consulting;
Climate Action & Energy Statement & Sustainability Statement prepared by Delap & Waller;
Operational Waste Management Plan prepared by AWN;
Resource & Waste Management Plan prepared by AWN;
Construction Environmental Management Plan prepared by AWN;
Residential Travel Plan prepared by Barrett Mahony Consulting Engineers; and
Landscape Design Report prepared by Stephen Diamond Associates.

It is considered that the proposed development is consistent with the environmental objectives as set out in the *NPF*.

6.3 Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)

Although perhaps outdated at this juncture, the proposed development will achieve one of the key action areas outlined in the report entitled *Rebuilding Ireland - Action Plan for Housing and Homelessness* (July 2016) ("*Rebuilding Ireland*") issued by the Minister for Housing, Planning, Community and Local Government in July 2016, namely to *'support greater provision of student accommodation'* which will help to ease the pressure on the private rental market.

Rebuilding Ireland is the Government's publication which recognises that a significant increase in new homes is needed to address the national housing crisis and is referenced in the long title to the *Planning and Development (Residential Tenancies) Act 2016, as amended.* The *Action Plan* outlines a five-pillar approach:

Pillar No. 1 – Address Homelessness;
Pillar No. 2 – Accelerate Social Housing;
Pillar No. 3 – Build More Homes;
Pillar No. 4 – Improve the Rental Sector; and

Pillar No. 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 3 and Pillar 4.

> **Pillar No. 3**: Build More Homes – Increase the output of private housing to meet demand at affordable prices.
>
> **Pillar No. 4**: Improve the Rental Sector – Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents. Support greater provision of student accommodation.

The *Action Plan* notes that the student population is projected to grow by around 20,000 students (or 15%) to approximately 193,000 No. students by 2024. The *Action Plan* also notes that the *'Report on Student Accommodation: Demand and Supply'* (2015) by the Higher Education Authority estimates that approximately 25,000 No. student bed spaces will be required nationally to meet the increase in demand resulting from the growth of the student population.

The *Action Plan* commits to:

> *"The development of a national student accommodation strategy in 2017 by the Department of Education and Skills (DES) in conjunction with the DHPCLG and other stakeholders, including DPER and the Department of Finance. This will set out a broad framework for delivery of an enhanced level of accommodation which will inform local authority housing strategies and the land management process in general, in order to provide suitably located and affordable sites."*

Additionally, there has been further research completed by the Department of Education and Skills which forecasts continued growth in third level students up to the years 2029-31. The report entitled *'Projections of demand for full-time third level education 2018-2040'* by the Department of Education and Skills is referenced in the CBRE Report which states the following:

> *"Under scenario S1 (baseline) total enrolments will rise each year up to 2030 and peak at 222,514, an increase of over 38,870 on 2017 levels,* ***driven primarily by demographic trends****. After 2030 numbers will fall steadily to reach 203,000 by 2040. Scenario S2, which holds the transfer rate steady but increases international enrolments by an additional 25 per cent over S1, will add an additional 3,658 students by 2030, and over 7,300 by 2040. Under S3 where both the transfer rate and international students rise strongly, enrolments in 2030 are projected to be 58,556 higher than 2017."* [Our Emphasis]

	S1 (baseline)	S2	S3	S0
2017		183,642		
2018	186,890	186,890	187,689	186,091
2019	191,324	191,324	193,141	189,506
2020	196,609	196,609	199,626	193,591
2023	204,339	205,437	212,691	197,085
2026	213,624	215,819	228,202	201,241
2029	222,264	225,556	241,167	206,653
2030	222,514	226,172	242,198	206,488
2031	222,109	226,133	242,392	205,850
2032	221,379	225,769	242,145	205,003
2035	215,091	220,578	236,607	199,063
2038	207,269	213,854	229,203	191,921
2040	202,925	210,241	225,193	187,972

Figure 6.2: Projected Third Level Education Enrolment Including Undergraduate, Postgraduate, and International Students

(Source: Department of Education and Skills, *Projections of demand for full time third level education, 2018-2040)*

To address the accommodation needs of the growing student population, there are a number of key actions listed in the *Action Plan*, particularly under Pillar No. 4 which are relevant to the development of student accommodation.

Key Action No. 4.7

Key Action No. 4.7 states that the *Action Plan* will:

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

The stated objective for the key action No. 4.7 is:

> *"To develop a national policy on specific needs and mechanisms for the development of appropriate on-campus and off-campus student accommodation."*

Key Action No. 4.8

Key Action No. 4.8 states that the *Action Plan*:

> *"Will work with stakeholders to prioritise and progress viable projects to provide additional student accommodation in key urban areas."*

The stated objective for key action No. 4.8 is:

> *"To bring on stream proposals capable of delivering an additional 7,000 student accommodation places by end 2019, on or off-campus, in addition to projects already committed to."*

Key Action No. 4.10

Key Action No. 4.10 states that the *Action Plan* will:

> *"Help to fund a Student Housing Officer to work with the Union of Students in Ireland, local authorities, AHBs and housing providers, to identify and expand short-term capacity enhancing measures in the student accommodation sector."*

The stated objective for key action No. 4.10 is:

> *"To assist students in finding appropriate accommodation."*

Key Action No. 4.13

Key Action No. 4.13 outlines the intention to:

> *"Enable student accommodation projects for 100 No. units or more to go straight to An Bord Pleanála, as well as maximise the opportunities for joint venture projects on local authority sites to proceed through the Part 8 process and prepare guidance on planning policies around student accommodation developments".*

The stated objective for Key Action No. 4.13 is:

> *"To enhance certainty and reduce delivery timescales and costs associated with bringing student accommodation proposals forward".*

All of these proposed Key Actions and a commitment to the production of '*National Student Accommodation Strategy (2017)'* have contributed to the growth and continuing delivery of PBSAs to the economy, with the majority taking place in the Greater Dublin Area.

The proposed student accommodation would provide for affordable student accommodation in an urban area of high demand in close proximity to public transport. The 941 No. new bedspaces will help to directly address the evident housing need, responding proportionately to the pillars as set out above. With less student requiring accommodation in the private market, this will result in additional availability of properties for other renters.

It has been demonstrated that the proposal at the subject site of this Planning Report is consistent with the policy guidance of the *Action Plan for Housing and Homelessness, Rebuilding Ireland.*

6.4 Housing for All – a New Housing Plan for Ireland, September 2021

Housing for All - a New Housing Plan for Ireland ("*Housing for All"*) is the government's housing plan to 2030. It is a multi-annual, multi-billion-euro plan which will improve Ireland's housing system and deliver more homes for all types for people with different housing needs.

In respect of Student Accommodation, *Housing for All* acknowledges that "*on-campus purpose-built student accommodation can alleviate pressure on the private rental market".* In a similar vein, off- campus accommodation will also relieve pressure, freeing up private rented accommodation in the area.

Housing Policy Objective 2: Increase protections for Tenants in Private Rental Accommodation includes policy 2.11, which states the following:

> "*Support diversification of housing stock and increase availability Ongoing DFHERIS, DFIN, of rental stock by supporting the development of Purpose Built DHLGH Student Accommodation by Technological Universities.*"

The provision of student accommodation by private developers will provide student accommodation with no requirement for investment by the Government, potentially allowing funds to be utilised elsewhere.

6.5 National Student Accommodation Strategy (2020)

The National Student Accommodation Strategy (2020) (*Student Strategy)* was designed to ensure that there is an increased level of supply of PBSA to reduce the demand for accommodation in the private rental sector by both domestic and international students attending our Higher Education Institutions (HEIs).

Ireland's higher education sector has been an important engine of our economic success and continues to grow and expand. The demand for higher education contributes to housing demand within our already constrained supply. Additional demand for housing around Higher Education Institutions, means that there is an increase in demand on many types of housing, especially the rental sector.

Section No. 6 of the National Student Accommodation Strategy (2020) highlights the role of the private sector in developing PBSA's., the report states:

> *'It is acknowledged that it is not possible to rely solely on the publicly funded HEIs to increase the supply of PBSA given the significant upfront capital investment required and the competing demands for capital investment that prevail in other areas in our HEIs.* ***It is clear therefore, that there is a requirement for investment from both publicly funded HEIs and private developers to seek to comprehensively address the identified shortfall in PBSA and the information to hand highlights that there are at least 10,000 additional bed spaces planned or under construction by private developers****.'* [Our Emphasis]

The National Student Accommodation Strategy also outlines the alignment of supply and demand of PBSA's in Ireland, stating:

*'It is estimated that there is currently an **unmet demand for 23,634 bed spaces. Drawing together the estimates of supply of, and demand for, PBSA shows that the demand for PBSA currently outstrips supply and this trend will continue to 2024.** This data is based on current and projected development of PBSA.'* [Our Emphasis]

Below is an extract from the National Student Accommodation Strategy report outlining the demand for student accommodation in 2019 and the projected supply and demand for PBSA's in Dublin:

Current and Projected Supply and Demand

	Supply 2017	Demand 2017 (excess demand)	Supply 2019	Demand 2019 (excess demand)	Supply 2024	Demand 2024 (excess demand)
Dublin	12,432	30,298 (17,866)	18,142	35,913 (17,771)	28,806	42,375 (13,569)

** It should be noted that this table solely relates to PBSA and does not include figures for Student Accommodation Bed Spaces in Private Family Homes (Digs).*

Therefore, the provision of 941 No. student bedspaces at this redevelopment site along Naas Road, will contribute to the overall supply for student accommodation in Dublin.

6.6 Guidelines on Residential Developments for 3rd Level Students (1999)

The *Guidelines on Residential Developments for 3rd Level Students (1999) ("1999 Student Guidelines")*, provide guidelines which are intended to assist developers and designers in formulating proposals for Student Accommodation.

In relation to floor areas, the *1999 Student Guidelines* state that:

> *'Accommodation under the scheme shall be provided by groupings of study bedrooms in "housing units". Each unit shall consist of a minimum of 3 bed spaces and an overall minimum gross floor area of 55 sq m, up to a maximum of 8 bed spaces and a maximum of 160 sq m.'*

The subject scheme has been largely designed in accordance with the floor area parameters outlined in the *1999 Student Guidelines* as demonstrated in Table 6.1 overleaf.

Core	Number	Type	GIA
A	A1-1/DA	7-bed cluster	157
	A1-2	7-bed cluster	160
	A2-1/DA to A8-1/DA	7-bed cluster	157
	A2-2 to A8-2	7-bed cluster	160
	A2-3/DA to A8-3/DA	7-bed cluster	159 sq m
	A2-4/DA to A8-4/DA	8-bed cluster	160 sq m
	A9-1/DA	7-bed cluster	157 sq m
	A9-2	7-bed cluster	160 sq m
	A9-3/DA	7-bed cluster	159 sq m
	A9-4/DA	8-bed cluster	160 sq m
	A10-1/DA	6-bed cluster	143 sq m
	A10-2	5-bed cluster	125 sq m
	A10-3/DA	5-bed cluster	123 sq m
	A11-1/DA to A14-1/DA	6-bed cluster	143 sq m
	A11-2 to A14-2	5-bed cluster	125 sq m
	A11-3/DA to A14-3/DA	5-bed cluster	123 sq m
B	B2-1/ DA to B8-1/ DA	8-bed cluster	160 sq m
	B2-2/ DA to B8-2/ DA	7-bed cluster	154 sq m
	B2-3/ DA to B8-3/ DA	8-bed cluster	160 sq m
	B9-1/ DA	8-bed cluster	160 sq m
	B9-2/ DA	7-bed cluster	154 sq m
	B9-3/ DA	8-bed cluster	160 sq m
C	C2-1/ DA to C8-1/ DA	8-bed cluster	160 sq m
	C2-2 to C8-2	8-bed cluster	160 sq m
	C9-1/ DA	8-bed cluster	160 sq m
	C9-2	8-bed cluster	160 sq m
	C10-1/ DA	4-bed cluster	92 sq m
	C10-2	8-bed cluster	160 sq m
D	D2-1 to D8-1	8-bed cluster	160 sq m
	D2-2/ DA to D8-2/ DA	6-bed cluster	141 sq m
	D2-3 to D8-3	7-bed cluster	159 sq m
	D2-4/ DA to D8-4/ DA	7-bed cluster	158 sq m
	D9-1	8-bed cluster	160 sq m
	D9-2/ DA	6-bed cluster	140 sq m
	D10-1	8-bed cluster	160 sq m
	D10-2/ DA	3-bed cluster	66 sq m

Table 6.1: Cluster Floor Area Schedule

(Source: *Design Statement* by HKR Architects, Annotated by Thornton O'Connor Town Planning, 2023)

CLUSTER SCHEDULE						
Floor	3 person	4 person	5 person	6 person	7 person	8 person
Basement						
Lower Ground Floor						
Ground Floor						
1st Floor					2	
2nd Floor				1	6	6
3rd Floor				1	6	6
4th Floor				1	6	6
5th Floor				1	6	6
6th Floor				1	6	6
7th Floor				1	6	6
8th Floor				1	6	6
9th Floor				1	4	6
10th Floor	1	1	2	1		2
11th Floor			2	1		
12th Floor			2	1		
13th Floor			2	1		
14th Floor			2	1		
TOTAL	1	1	10	13	48	50
					TOTAL	123

Figure 6.3: Cluster Schedule

(Source: *Design Statement* by HKR Architects)

In relation to the provision of amenity areas, the *1999 Student Guidelines* state that:

> *"The provision of shared kitchen/dining/living room space shall be based on a minimum of 4 sq m per bedspace in the unit. This shall be in addition to any shared circulation. At a minimum basic kitchen unit with sink, cooker and fridge shall be installed. "*

The subject scheme has been designed to include the provision of a communal living/kitchen/dining room for every cluster of bedspaces at each level with a minimum of 4 sq m per bedspace provided.

In relation to the provision of accessible rooms, the *1999 Student Guidelines* state the following:

> *"Developments should provide a minimum of one out of every fifty, or part thereof, of the total number of bedspaces in a development designed for students with disabilities. These study bedrooms shall be fully wheelchair accessible complete with ensuite bathroom facilities."*

Out of the 941 No. bedspaces within the proposed development, there are 47 No. Accessible rooms for future residents. This equates to 1 out of every 20 No. bedspaces and therefore exceeds the requirement of the guidelines.

The *1999 Student Guidelines* provide minimum floor areas for the bedspaces and facilities as follows:

> *"These will be used as study bedrooms requiring desk space and storage. Therefore, one of the following minimum areas shall apply depending on provision of bathroom facilities:*
>
> - *Single study bedroom 8 sq m;*
> - *Single study bedroom with ensuite shower, toilet and basin 12 sq m;*
> - *Twin study bedroom 15 sq m;*
> - *Twin study bedroom with ensuite shower, toilet and basin 18 sq m; and*
> - *Single disabled study bedroom, with ensuite disabled shower, toilet and basin 15 sq m."*

All of the bedspaces within the subject scheme are ensuite and comfortably meet the above outlined minimum floor areas. The accessible rooms also meet the above-outlined requirements as they are ensuite and measure 25 sq m at a minimum.

Although there is no specific guidance in relation to the level of provision of amenity spaces outlined in the *Guidelines on Residential Developments for 3rd Level Students* (1999), Section 16.10.7 of the *Dublin City Development Plan 2022-2028* states that:

> *"Adequate external open space of suitable orientation should be provided within developments for the amenity of students. Generally ground floor courtyards that achieve appropriate daylighting and sun lighting will be required. In certain circumstances, terraces and roof gardens will be considered but only in addition to appropriate ground level amenity provision……All proposed 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****."* [Our Emphasis]

For the purpose of designing the subject scheme, the above standard has been applied and some 5.2 sq m per bedspace has been provided.

The subject scheme includes the provision of 4,027 sq m internal dedicated amenity space and 1,174 sq m of high quality landscaped external amenity space for future residents to enjoy. The total quantum of external and internal communal amenity space equates to 5,201 sq m or 5.53 sq m amenity space per resident, in excess of the Dublin City Council minimum standard of 5 sq m. It is of note that 70 sq m of external amenity space at first floor level of Block 2 does not meet the BRE Guidelines for daylight and sunlight and is thus removed from the total useable amenity space.

6.7 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) ("Building Height Guidelines")

The *Urban Development and Building Heights: Guidelines for Planning Authorities* (*'Building Height Guidelines'*) established a series of national rules in relation to building heights and new developments. The *Building Height Guidelines* were prepared to work in concert with the objectives of the NPF and other national standards for the delivery of sustainable development and compact growth.

The *Building Height Guidelines* set out that a key objective of the *NPF* is to significantly increase the building heights and overall density of developments. The Minister's foreword to the *Building Height Guidelines* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas which is an unsustainable model. There is an opportunity for our cities and towns to be developed differently.

Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The *Building Height Guidelines* are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards.

The *Building Height Guidelines* state that the:

> "*Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes,* ***by building up and consolidating the development of our existing urban areas.***
>
> [….]
>
> ***A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development*** *is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.*" [Our Emphasis]

Under Specific Planning Policy Requirement 1, Planning Authorities are required to avoid the application of blanket height restrictions; but through the plan-making process, identify areas where increases in height can be pursued:

> *"In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height."*

In accordance with SPPR1, the Development Plan identified a series of areas within which additional height would be supported, with 'Public Transport Corridors' considered to be applicable to the subject site. Accordingly, the Development Plan prescribes a series 10 No. objectives and associated criteria in Table 3 of Appendix 3 which development of increased height exceeding the prevailing context must meet. These are responded to in Section 8.2.5.2 (below), demonstrating how the proposed development complies with them and can support the delivery of sustainable development.

Consequently, although the Height Guidelines specify a series of criteria which taller structures need to meet to allow the Council to Grant Planning Permission under SPPR3[11], these have not been directly responded to here (even though the proposed development complies with them), as they apply to developments proposed in instances where the height would be contrary to the specific objectives of a statutory plan (i.e. where blanket heights are applied). The Council is referred to the responses / compliance statements in relation to Table 3 of Appendix 3 below for a full assessment of the proposed development's height.

6.8 Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)

The *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)* outline a number of key principles which are of relevance to the subject scheme, albeit Student Accommodation is proposed:

> *"The purpose of these Guidelines is to assist in achieving the objectives of Delivering Homes; Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by:*
>
> - *Promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*
> - *Encouraging best use of building land and optimal utilisation of services and infrastructure in the provision of new housing;*
> - *Pointing the way to cost effective options for housing design that go beyond minimum codes and standards; promoting higher standards of environmental performance and durability in housing construction;*
> - *Seeking to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and providing homes and communities that may be easily managed and maintained."*

The proposed development provides a high-quality designed scheme in accordance with the above required standards. The scheme has taken the opportunity to explore the increase in building height and density, especially having regard to the site's frontage onto the Naas Road, and the scheme makes optimal use of the land. The scheme will be provided with high-quality materials as described throughout the Architect's Design Statement. The façade of the buildings has been considered in detail to deliver an overall visual variety but with façade modules designed with detail, colour and textural variety. The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications of the proposed development. The scheme will provide attractive and high-quality units, open spaces and internal amenities which ensure that first-rate living conditions will be developed.

[11] SPPR1: *"It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise…"*

6.9 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Area (2009) and the Urban Design Manual – A Best Practice Guide (2009)

The aim of *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) ("Sustainable Residential Development Guidelines 2009")* is to set out the key planning principles which should be reflected in development plans and local area plans, and which should guide the preparation and assessment of planning applications for residential development in urban areas. The document sets out high level aims that:

> *"Need to be translated into specific planning / design policy and objectives which can be applied at different scales of residential development, ranging from districts or neighbourhoods within large urban centres, to expansion of smaller towns and villages, and finally down to the level of the individual home and its setting."*

There are 10 No. high-level aims set out in the document, which are set out and responded to below:

High-Level Aim	Proposed Development
Prioritise walking, cycling and public transport, and minimise the need to use cars;	The scheme promotes sustainable modes of transport by providing only a small number of car parking for the staff (7 No.), encouraging walking, cycling and the use of public transport for the students.
Deliver a quality-of-life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;	The development will provide high-quality units with large areas of open spaces in the form of internal and external communal amenity space as well as external public open space. The development promotes safety and facilitates the natural surveillance of adjoining routes and spaces. The site is located in proximity to high quality public transport, services and facilities, and is thus an ideal and convenient location for student development as it can distribute students to campuses across the City including a direct link to TUD in Tallaght and to the Dublin 1, 2 and 7 and 8 campuses.
Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;	The subject site is in close proximity to various facilities that students of the accommodation will be able to utilise including shops, cafes etc. Further as each of the Naas Road sites are developed, they will each provide amenities and facilities, for the Naas Road lands which the students will be able to utilise.

	The proposed development will include a retail unit and cultural/community spaces where collaborations may be explored between the students and the community/cultural users of the building. These spaces will support people in exploring their creative side through the provision of a Digital Hub and a co-working space which may allow students to mix with professionals in the community utilising this office space.
Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;	A detailed Architectural Design Statement and Landscape Design statement has been submitted with this Planning Application which details that high-quality materials have been proposed for the subject scheme. The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications of the proposed development. The development will provide communal open spaces that have been designed to be vibrant and accessible, creating a distinct sense of place within the subject site. The public open space through the site forms a key aspect of the overall design proposal with the newly daylighted Camac river at its centre. This will ensure this particular site has a distinct sense of place in the wider Naas Road lands.
Are easy to access for all and to find one's way around;	Communal open space is provided throughout the scheme, which will be easy to navigate and will enhance permeability for the site so that students will be able to navigate their way around with ease. The access to their private accommodation will be easily accessible for the students, with disabled access included throughout the development in the form of lifts, ramps and wider door openings. In the context of the public open space, there are clear opportunities for traversing the site to the Carriglea site behind and beyond, with significant public amenity provided on the subject site through vast quanta of public open space.

Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;	The proposed development represents the sustainable and efficient development of underutilised land in a core urban location, proximate to public transport, employment, services and facilities. A *Sustainability & Climate Action & Energy Statement* prepared by Delap & Waller is enclosed with this application which outlines low carbon and renewable energy solutions for the scheme.
Provide a mix of land uses to minimise transport demand;	The development principally provides student accommodation units with residents' amenity space in addition to communal open spaces, community and cultural spaces and a retail unit which in total contributes to a mix of uses within the wider area. The development promotes sustainable modes of transport, especially due to the site's location proximate to the Luas and bus stops. The scheme provides 1,162 No. secure bicycle parking spaces, 218 No. spaces to be provided externally and scattered around the site, 941 No. spaces to be provided internally in a bike store on the lower ground floor and ground floor level in Block 1, 1 No. space provided within the retail unit and 2 No. spaces provided within the cultural and community space for staff. Therefore, the development encourages sustainable modes of transport which will eliminate car usage related to the scheme.
Promote social integration and provide accommodation for a diverse range of household types and age groups;	The development promotes social integration with the range of communal open spaces and cultural/community space. The student accommodation units will add diversity to the existing unit provision in the area as there are no student accommodation developments in this part of the City and as such, it will contribute to alleviating the demand for student accommodation in Dublin. There are also larger studio units proposed which may perhaps to be more suitable for mature students.
Enhance and protect the green infrastructure and biodiversity; and	The development will significantly enhance and contribute to the green infrastructure and biodiversity of the site and wider area. The scheme will provide new landscaping and tree planting on the site that currently

	comprises hard-surface car parking and will act as a green infrastructural link towards other green infrastructure networks in the City. The re-establishment of the currently culverted River Camac will introduce new green and blue space, tree planting and biodiversity to the subject site. The proposed development will open up the river to introduce more green infrastructure and biodiversity to the area which is predominantly hardstanding currently and thus key biodiverse benefits will ensue.
Enhance and protect the built and natural heritage.	The proposed scheme will enhance the natural and built heritage of the site, due the high-quality design proposed, in addition to the large provision of communal and public open spaces. The site will enhance the visual amenity of the area and will be a positive insertion to the area having regard to the current underused surface car parking spaces on site which represents a significant underutilisation of scarce urban land. Gowan House is not of architectural heritage significance. Located near the subject site is Naisetra, a Protected Structure, with a further Drimnagh Castle at a further distance however, the *Architectural Heritage Impact Assessment* prepared by Historic Building Consultants concluded that the Protected Structure is well screened, and the proposed development will have no appreciable effect on the setting of the Protected Structure.

The *Urban Design Manual – A Best Practice Guide (2009)* is a companion document to the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).*

The Urban Design Manual sets out 12 No. key indicators for developments in urban areas:

No.	High-Level Aim	Proposed Development
1	*Context – How does the development respond to its surroundings?*	The proposed development has been subject to a high-quality design by HKR. In our opinion, the heights provided in the subject development are appropriate having regard to the express requirement in National level policy to achieve compact growth, in addition to the careful modulation of height

		throughout the site with the provision of setbacks. Planning Applications submitted to Dublin City Council/ An Bord Pleanála on lands in the immediate vicinity of the subject site proposed similar or additional storey heights to that being proposed for the subject site. These applications have been approved. Therefore, the height of the proposed development is wholly in keeping with the surrounding context and has taken its cue from the adjoining permitted Carriglea and Concorde sites. The surrounding context is everchanging with more mixed-use residential development being proposed and approved although there is no other Student Accommodation proposed. Most notably, the Carriglea mixed-use residential development to the rear of the subject site (DCC Reg. Ref. 4244/15) is currently under construction. The Design Team have comprehensively considered the scheme layout and modulation in order to ensure that the development improves legibility in the area and will integrate into the surrounding context.
2	Connections – How well connected is the new neighbourhood?	The closest Luas stop to the subject site is Bluebell Luas Stop, located c. 150 metres to the east of the subject site, or a c.2-minute walking distance. The Line that serves this Luas stop is the Red Line which provides access between Connolly Station or The Point to either Saggart or Tallaght. The Luas allows access to the city centre in less than 20 minutes or southbound towards Tallaght and Citywest in less than 30 minutes. The Luas will be available for the future students of the proposed accommodation to use, providing routes to various locations in Dublin frequently. In this regard, the public transport study has identified significant capacity on the Luas. There are various bus stops located in close proximity to the subject site, with the closest one being stop No. 1954, situated c. 150 metres east from the site. The closest stop to provide access towards Dublin City is located c.500 metres west of the subject site, with the

		stop No. 4406. These stops serve Dublin City Bus Nos. 13, 68/A and 69. The scheme provides 1,162 No. secure bicycle parking spaces and 7 No. car parking are provided. It is evident that the site is well connected, and sustainable modes of transport are encouraged within the proposed scheme. The proposed public open space will include a Connection Plaza to provide a permeable link down through the middle of the site from Naas Road and the Central Plaza to the linear park in the Carriglea site, which will improve connections for the entire neighbourhood.
3	Inclusivity – How easily can people use and access the development?	As previously noted, the proposed development has been designed to encourage sustainable modes of transport e.g. walking, cycling and public transport. For example, the scheme includes significant bicycle parking and a small number car parking (7 No.) for staff only. We note that significant efforts have been made to ensure accessible routes have been provided throughout the scheme, with level access provided to the proposed building and with the facilitation of accessible open space and cultural/community space. In order to ensure easy access to the site for pedestrians, Barrett Mahony Consulting Engineers sets out the following in the *Civil Engineering Infrastructure & Surface Water Management Report:* "*It is proposed that pedestrians accessing or leaving the site will be permitted to enter or exit directly onto the Naas Road footpath to the northwest, providing good connectivity to the surrounding areas. Connectivity will also be provided through the adjacent Carriglea Residential Development, facilitating pedestrians travelling southeast towards Drimnagh Castle.*" The Report continues to provide details regarding cyclist access:

		"Following discussions with Dublin City Council Transportation Planning, it is proposed that cyclists will enter the site from the access road to the west of the development, via the main junction with the Naas Road. New cycle lanes will be provided in both directions along the access road."
4	Variety – How does the development promote a good mix of activities?	The development provides 941 No. student accommodation bedspaces with both public and private open spaces, cultural/community space and a retail unit. The proposed communal open space will consist of 5,201 sq m of external and internal amenity space. The public open space will be provided in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway above the Riparian Zone, equating to 4,162 sq m in total. Therefore, the proposed scheme has been designed ensuring that a wide variety of amenities and facilities are available within the development. We note that the area surrounding the subject site contains a wide variety of services, facilities and amenities which are all within walking and cycling distance of the subject site.
5	Efficiency – How does the development make appropriate use of resources, including land?	National policy expressly seeks the densification of underutilised lands such as the subject site. The subject site is located in close proximity to public transport options and the city centre and is ideal for the provision of student accommodation and the development represents efficient densification of core urban lands. The proposed development represents the appropriate densification of this underutilised site and integrates with the surrounding environment. The proposed scheme provides for large, high quality landscaped areas which will provide amenity and biodiversity.
6	Distinctiveness – How do the proposals create a sense of place?	The scheme provides communal open space and cultural/community space which will allow students to enjoy high-quality landscaped outdoor spaces and well-designed internal spaces, which will create a sense of place.

		As noted above, the re-establishment of the River Camac will provide elevated walks with tree planting, green infrastructure and biodiversity net gain, bringing a new sense of place to the current hardstanding site.
7	Layout – How does the proposal create people friendly streets and spaces?	The proposed communal amenity spaces have been designed to encourage students of the accommodation to utilise, creating spaces for integration and the opportunity for students to socialise with one another. These spaces are intended to reduce the refinement of students to the bedroom and instead creates an inviting space where students can get to know one another, thus creating people friendly spaces. The proposed cultural/community space and public open space is a positive and important part of the proposed development as the subject site, in its current form, does not provide any cultural/community space or public open space for local residents to enjoy. The proposed cultural/community space is mostly provided internally (92%), with some external space (8%). These spaces will provide space for the local community to come and express themselves freely. The proposed layout of the public open space allows legible and easy access throughout the site to connect Naas Road to the linear park located directly to the south of the subject site.
8	Public Realm – How safe, secure and enjoyable are the public areas?	The outdoor spaces will be subject to a high level of passive surveillance ensuring that these areas are safe and secure. There will be 3,000 sq m of Public Open Space provided in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway (above the Riparian Zone. These spaces will provide safe and accessible spaces for local residents and students to enjoy. One of the aims of the proposed development is to connect the linear park located to the south of the subject site to the wider area along Naas Road. The spaces proposed for students will not be publicly accessible ensuring they are safe and secure locations for the students.

<table>
<tr><td></td><td></td><td>The proposed development includes a comprehensive Landscape Plan and Landscape Planning Report prepared by Stephen Diamond Associates, a copy of which is enclosed with this planning application, and which sets out the strategy for the provision of safe, secure and enjoyable spaces.</td></tr>
<tr><td>9</td><td>Adaptability – How will the buildings cope with change?</td><td>The ground floor level of the development allows for floor to ceiling heights of 4 No. metres which are capable of internal modification, where deemed necessary as per SPPR 5 of the Sustainable Urban Housing: Design Standards for New Apartments (2022).

A retail unit measuring 250 sq m is provided at ground floor which can be adapted to student amenity space in future if required.</td></tr>
<tr><td>10</td><td>Privacy and Amenity – How does the scheme provide a decent standard of amenity?</td><td>The contemporary design provides for versatile private units with a shared communal living/kitchen/dining room. There will be large open spaces provided as follows which will contribute towards providing a high standard of amenity:
<table>
<tr><td>Communal Amenity Space</td><td>5,201 sq m</td></tr>
<tr><td>Cultural/Community</td><td>1,533 sq m</td></tr>
<tr><td>Public Open Space Accessible</td><td>3,000 sq m</td></tr>
<tr><td>Riparian Zone</td><td>1,261 sq m</td></tr>
</table>

The communal amenity space proposed is provided in the form of a roof gardens, open space and a terrace and a further4,027 sq m of internal amenity space at basement, ground and first floor levels. Therefore, the amenities available to the students will be varied and high-quality.

The proposed cultural/community space will be provided both internally and externally. Some 1,422 sq m of internal space will be provided, making up 92% of the total amount, while there will be 131 sq m of external space provided, making up the remaining 8% of cultural/community space to be provided. The cultural uses will principally include: a digital hub; office; and storage space.

The proposed useable Public Open Space will be provided in form of a Central Plaza, Connection Plaza, Green Route Boulevard,</td></tr>
</table>

		and an Elevated Walkway above the Riparian Zone. The proposed communal spaces will not be open to the public, with only future students of the accommodation allowed to use such spaces. It is clear that the proposed scheme provides for a high-quality student development in accordance with minimum standards.
11	Parking – How will the parking be secure and attractive?	There will be 7 No. car parking provision for the proposed scheme. Sustainable modes of transport such as cycling and walking are promoted within the scheme, with the provision of 1,162 No. cycle parking spaces.
12	Detailed Design: How well thought through is the building and landscape design	A detailed Architectural Design Statement prepared by HKR and Landscape Design Report by Stephen Diamond Associates are submitted as part of this planning application, which sets out the design rationale of the proposed development providing a high-quality innovative scheme.

The assessment of the proposed development above and in the context of the expert reports referred to demonstrates that the proposal is consistent with the guidance as set out in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009).*

6.10 The Planning System and Flood Risk Management (2009)

The *Planning System and Flood Risk Management Guidelines (2009)* published by the Government of Ireland includes the following core objectives:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and

- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The *Flood Risk Assessment Report* carried out by Barrett Mahony Consulting Engineers concludes the following:

> *"This flood risk assessment report has considered the various possible sources of flooding in the site vicinity. The report has established that the site is at negligible risk of flooding from external sources and that the development is 'Appropriate' in accordance with the OPW Guidelines.*
>
> *The surface water drainage systems within the site is designed to cater for 1 in 100 year flows +30% climate change and 10% urban creep, without flooding. There is no discernible potential impact of the development on flooding in the vicinity of the site or downstream of it. The surface water flow from the development will be limited to 2 l/s/ha.*
>
> *Basement drainage with be pumped to avoid the risk of sewer backflows into the basement.*
>
> *We conclude that a further detailed flood risk assessment is not required."*

Thus, the proposed development is acceptable having regard to the objectives of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

6.11 National Planning Policy Conclusion

The proposed development seeks to provide PBSA in a suitable location that is well serviced by public transport, has efficient and safe infrastructure surrounding the subject site for walking or cycling, and is in close proximity to local amenities and facilities. The location of the subject site in close proximity to the Luas and bus services means that future students will have easy access to their centres of education without paying City Centre prices for their accommodation. This site-based regeneration seeks to respond positively to the surrounding context where proximate sites are under intense regeneration, as discussed previously in Section 4.2 of this Planning Report.

The proposed 941 No. student bedspaces will contribute to the well-needed supply of PBSA in Dublin as the demand for PBSA's currently outstrips the supply. To address this current issue surrounding the supply of PBSA's, the proposed development seeks to fully maximise the potential of the subject site by building upward, creating a high-density style development. The proposed height of 11-15 storeys (above lower ground floor level) will enable suitable compact growth on a suitable plot of underutilised land.

It is therefore concluded that the proposed development fully accords with the National Planning Policy.

7.0 STATEMENT OF CONSISTENCY – REGIONAL PLANNING POLICY

This section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within the respective policy document. Within this section the development will be assessed against the *Regional Spatial and Economic Strategy ("RSES") for the Eastern and Midland Region* and the *Dublin Metropolitan Area Strategic Plan* ("MASP") which is set out in the *RSES.*

Such longer-term planning has been introduced incrementally as part of the *Action Plan for Housing and Homelessness, Rebuilding Ireland* and the *NPF* and is made a statutory requirement by the *NPF*. The longer nature of regional plans, and the creation of a reformed planning hierarchy means that sustainable development must have regard to these documents.

The adoption of the *NPF* replaced the previous planning hierarchy by establishing the requirement for the Regional Assemblies to adopt their own Regional Plans which will help to inform Metropolitan and Urban Plans, as well as the formation of Local Development Plans into the future. The *Regional Planning Guidelines for the Greater Dublin Area 2010-2020* was the previous Regional Planning Policy document that development proposals would have had to adhere to, however, the introduction of the *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly* has superseded the *Regional Planning Guidelines.*

7.1 Regional Spatial and Economic Strategy for the Eastern and Midland Region

As illustrated in Figure 7.1 below, Dublin is located in the Eastern & Midland Region, where the *Regional Spatial and Economics Strategy* was implemented in June 2019 under the long-term planning goal to "*create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all*".

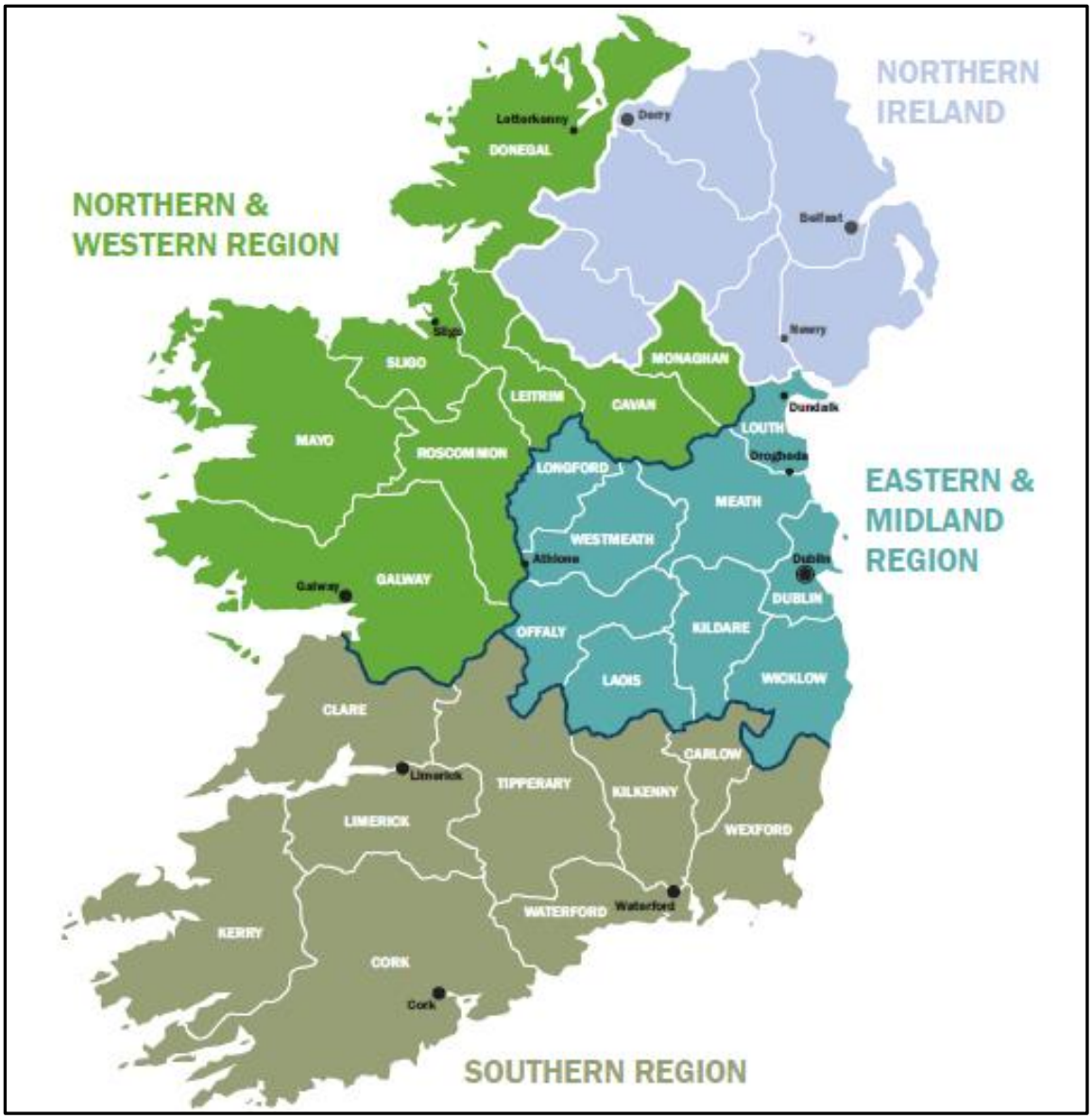

Figure 7.1: Regional Assembly Areas of Ireland

(Source: *Ireland 2040: National Planning Framework*)

The *RSES* identifies the importance of understanding the age of our population in order to plan for the long-term housing, transport, education and employment needs:

> "*In 2016 the age profile of the Region is young with nearly half a million children or 1 in 5 people in the Region that are aged under 14 years of age, rising to 1 in 4 of the population in fast growing counties like Fingal and Laois. The population surge is moving up from primary school age and the number of children of secondary school age children is expected to rise to 2026 and decline thereafter.* ***By 2031 there will be a significant increase in the number of people in the 15-24 years age cohort, which will lead to greater demand for third level education.***" [Our Emphasis]

In terms of the ongoing supply issue of housing across the Region, the *RSES* states:

> "*One of the challenges facing the Region is the continued growth rates of household formation coupled with a* ***severe slowdown in the development of new housing*** *stock*

during the economic recession, resulting in ***housing supply and affordability pressures in both sale and rental markets, particularly in Dublin*** *and urban areas but affecting all of the Region.*" [Our Emphasis]

The proposed development seeks to provide 941 No. student bedspaces in a suitable location that is in close proximity to various public transport options. The provision of these units will ultimately provide much-needed PBSA, which in turn will relieve some of the pressure the rental sector in Dublin is facing by freeing up residential units that could be used by the rest of the general population.

The *RSES* seeks to determine at regional scale how best to achieve the goals set out in the National Strategic Outcomes of the *NPF.* The *RSES* therefore sets out 16 No. Regional Strategic Outcomes (RSOs) that have been developed in correlation with the 3 No. Key Principles of the *RSES:* Healthy Placemaking, Climate Action, and Economic Opportunity. The 16 No. RSOs and how the proposed development adheres with each criterion is set out in the table below:

No.	Objective:	How it is Addressed by this Development:	Does it meet the criteria:
1	Sustainable Settlement Patterns	Sustainable and efficient use of underutilised lands in an existing urban area to provide a student accommodation scheme beside excellent public transport which will contribute positively towards addressing the deficit in PBSA. The proposed height of the scheme is to be part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 12 No. storeys (above basement level) for Block 2, which will facilitate 941 No. bedspaces. The proposal seeks to build upwards in order to create a high-density development, providing more bedspaces in a suitable location in close proximity to various public transport options.	Yes
2	Compact Growth and Urban Regeneration	The proposed development makes better use of an under-utilised land which currently occupies a part office and part warehouse building. The surrounding context of the site is undergoing intense regeneration; therefore, the redevelopment of the subject site is fully in keeping with the surrounding area. The proposed scheme would see development of part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 12 No. storeys (above basement level) for Block 2, to provide 941 No. bedspaces. This creates high-density housing while still providing substantial amenity and cultural/community spaces, as well as green infrastructure and biodiversity gains throughout	Yes

		the site. Because of the sites location in proximity to the Luas and bus stops, the proposed density is considered an acceptable form of compact growth.	
3	Rural Communities	N/A – Urban Area	N/A
4	Healthy Communities	There are 7 No. car parking spaces proposed for the subject scheme and 1,162 No. bicycle spaces provided. Walking and cycling are highly promoted for future students and occupiers of the commercial spaces as there are facilities and amenities nearby and the Luas and bus stops are in very close proximity. The use of public transport, as well as the promotion of cycling will create a healthy environment for students with less carbon emissions released. Not only will the low number of car parking spaces benefit the health of students of the accommodation, but it will also contribute to the health of nearby residents of other residential development as less cars will be on the road, meaning less carbon emissions released. The proximity of the subject site to public transport will connect students to Higher Education Institutes easily. Tallaght University Hospital, Cherry Orchard Hospital and St. James's Hospital are all located nearby with the campuses in Dublin 1,2 7 & 8 also easily accessible.	Yes
5	Creative Places	Cultural and community spaces will be provided on-site, providing 1,422 sq m of internal space and 131 sq m of external space. The cultural space, totalling to 729 sq m, will principally comprise a digital hub, co-working space and ancillary and storage space. Digital hubs are spaces for people to gather and work together on projects, providing a shared unit that promotes teamwork, innovation and creativity. In this location where there will be a student population and having regard to the proximity to the Ballyfermot College, which specialises in media, it is envisaged that the digital hub space will be utilised for podcasts, YouTube studio space, gallery space, kitchen, photography studios, makerspace and general shared working for creatives.	Yes

		The community space, totalling to 512 sq m, will principally comprise a café, co-working areas, and ancillary space. The co-working areas provides space for people generally living in nearby residential developments to use should they wish to work from home, whilst benefiting from an office-like experience. It can also be utilised by start-ups who do not yet have permanent office space. There is also 312 sq m of shared cultural and community space in the form of a shared reception and an accessible break-out space.	
6	Integrated Transport and Land Use	The proximity of the subject site to the Bluebell Luas stop as well as the bus stop that serves Dublin Bus route Nos. 13, 68/A and 69, the site is in an appropriate location for development of this type. The proposed BusConnects scheme will have a bus route along Naas Road and another one along Kylemore Road and Walkinstown Avenue, both providing direct routes to various Higher Education Institutions, such as University College Dublin.	Yes
7	Sustainable Management of Water, Waste and other Environmental	Please see enclosed the Technical Note - Operational Waste Management Plan prepared by AWN and the Sustainability Statement prepared by Delap & Waller. Sustainable management of energy use, management of water use and waste output are detailed in the accompanying reports. Sustainable modes of transport are encouraged.	Yes
8	Build Climate Resilience	As specified in the *Flood Risk Assessment Report* prepared by Barrett Mahony Consulting Engineers that accompanies this Planning Application, there is no possibility of the subject site flooding in the long-term due to the specific location of the site.	Yes
9	Support the Transition to Low Carbon and Clean Energy	The proposed development will be subject to detailed design which prioritises the energy performance of the building. The number of car parking spaces proposed as well as the increased quantity of bicycle parking will contribute to sustainable modes of transport and to the transition to low carbon and clean energy.	Yes
10	Enhanced Green Infrastructure	Green Infrastructure will be delivered on site through tree planting and green spaces, notably through the daylighting of the River Camac.	Yes

		There is currently no green infrastructure on site due to the hardstanding nature of the current use. A 'Green Route' will be provided along the western boundary of the site will provide a long green corridor for both the public and students of the accommodation to use. The proposed development will also incorporate roof gardens and green roofs on Blocks 1 and 2.	
11	Biodiversity and Natural Heritage	The proposed scheme will see the daylighting of the River Camac, with elevated walkways and green infrastructure to be provided. The daylighted river will gain biodiversity that will remain untouched and unharmed from future occupants and visitors due to the changes in level, which means this space will only be accessed for maintenance and not by the general public.	Yes
12	A Strong Economy Supported by Enterprise and Innovation	The proposed development will support the employment of a highly skilled workforce during the construction phase of development that will ultimately contribute to a strong economy. Post-construction will also see the employment of staff needed to run the student accommodation, the cultural/community and retail floorspaces. The retail unit and cultural and community space will also contribute towards strengthening the local economy and the regeneration of the surrounding area. Further, the students will provide staff for the shops, cafes, pubs and restaurants in the wider area.	Yes
13	Improve Education Skills and Social Inclusion	Communal open areas will be provided in the form of amenity space. These spaces will enable students to interact with each other and provide safe spaces for people to meet one another. Safe and high-quality student accommodation with easy access to their third level facilities will also facilitate improved education skills as students of Gowan House will be alleviated of the concern as to where they can stay whilst in College.	Yes
14	Global City Region	N/A – International Connectivity through Ports and Airports	N/A
15	Enhanced Strategic Connectivity	The subject site will benefit from the proposed BusConnects scheme which will see more bus routes available at a higher frequency to Dublin Bus. This will enable students to travel to third	Yes

		level institutions with ease, helping to improve the connection between student accommodation and third level institutions.	
16	Collaboration Platform	The provision of student accommodation by private developers will provide student accommodation with no requirement for investment by the Government, potentially allowing funds to be utilised elsewhere. The propsed digital hub in particular will allow collaboration between the students and this space, Further the co-working space will allow collaboration with and between the wider community.	Yes

Overall, as demonstrated throughout this section, the proposed scheme is consistent with the *Regional Spatial & Economic Strategy (2019-2031).*

7.1.1 Dublin Metropolitan Area Strategic Plan

The *MASP* is identified in the Chapter 5 of the *RSES*, where the focus is on Dublin City Centre and its suburbs, and how the area can manage sustainable and compact growth, while responding to housing supply, affordability, and transport improvements. The *RSES* describes the Dublin Metropolitan Area as "*young, diverse and multicultural*". The vision set out in the *RSES* for the *MASP* is:

> "*build on our strengths to become a smart, climate resilient and global city region, expanding access to social and economic opportunities and improved housing choice, travel options and quality of life for people who live, work, study in or visit the metropolitan area*."

The *MASP* identifies 'strategic residential and employment development corridors' in order to create sustainable compact communities provided with more housing, and that have access to enhanced services and amenities, as well as social and economic opportunities. In order to achieve 50% increase in new homes by 2040 (the period of the *NPF*), these corridors will endure residential and economic development and redevelopment opportunities. As illustrated in Figure 7.2, the subject site is located in the 'City Centre within the M50' and the 'South-West Corridor'.

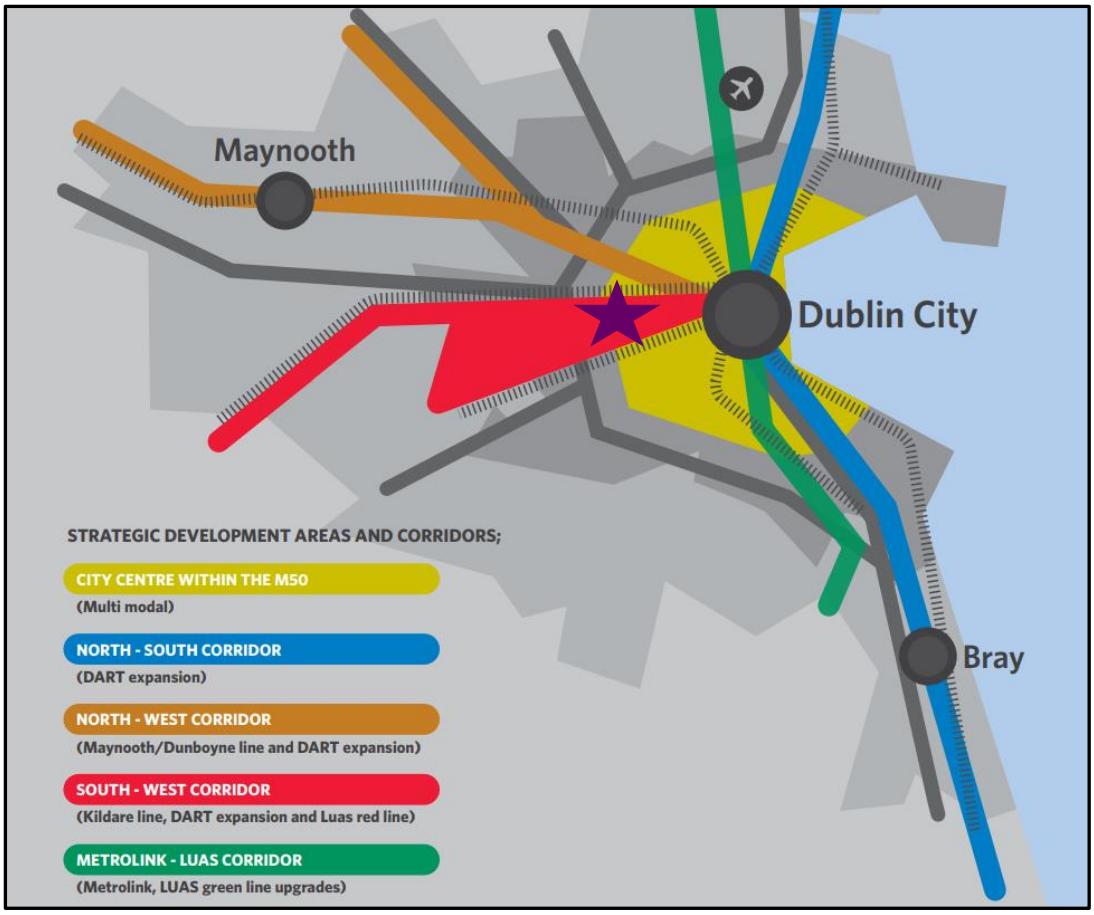

Figure 7.2 **Strategic Development Area and Corridors (Indicative Location of the Subject Site Identified by a Red Star)**

(Source: ***Regional Spatial and Economic Strategy*** **(Eastern and Midlands Region), Annotated by Thornton O'Connor Town Planning, 2023)**

According to the *MASP*, the 'City Centre within the M50' includes the following:

> "*The ongoing regeneration of Dublin Docklands and Poolbeg, coupled with the redevelopment of older social housing (former PPPs),* ***industrial and underutilised lands****, support the consolidation of Dublin City. The proposed DART Underground and LUAS extensions to Finglas and Lucan subject to appraisal and delivery post 2027, will unlock long-term capacity including strategic landbanks such as Dunsink.*" [Our Emphasis]

According to the *MASP*, the 'South-West Corridor' includes the following:

> "*The consolidation of the western suburbs of Clonburris, Kilcarbery and Adamstown, linked to increased capacity and electrified services on the Kildare line, to be delivered by 2027, and at Grangecastle supported by additional bus connections.* ***Brownfield regeneration lands at Naas Road*** *and Tallaght and new residential communities at Fortunestown,* ***supported by the LUAS redline.***" [Our Emphasis]

In terms of the capacity within each Corridor to provide residential development and employment/mixed use development, the *MASP* identifies Naas Road to be of significant importance, particularly referring to the underutilised lands and older industrial estates along the road that have the potential for re-intensification of lands.

The subject site has the potential to provide much needed student accommodation along Naas Road, complying with the vision of the *MASP* and also being one of the locations of interest within the 'City Centre within the M50' Corridor and 'South-West Corridor' for residential, employment, and mixed-use development.

8.0 STATEMENT OF CONSISTENCY – LOCAL PLANNING POLICY

This section will demonstrate that the proposed development has been designed in accordance with Local Policy and with due regard to the objectives and guidance as set out within the *Dublin City Development Plan 2022-2028*. It will also refer to the City Edge Strategic Framework. The *Dublin City Development Plan 2022-2028* is the statutory plan for the area and guides development relating to the subject site.

8.1 City Edge Strategic Framework

The subject site sits within the City Edge Strategic Framework Plan (August 2022), which provides a framework for the development of the Naas Road lands and will form the basis for a statutory LAP which is expected to be adopted in c. 1 No. year. Although as part of a national strategy to regenerate and rejuvenate our cities, Dublin City Council and South Dublin County Council at a local level have created this new Framework to deal with economic and residential growth in an existing urban area.

The opportunity and overview of the Framework is as the following:

> "*Unique in Ireland, the City Edge Project is a transformative initiative, re-imagining the Naas Road, Ballymount and Park West areas at the western edge of Dublin City. Creating a new urban quarter, it has the potential for 40,000 new homes and 75,000 jobs, making it one of the largest regeneration schemes in Europe.*
>
> [….]
>
> *Covering an area of ca. 700 hectares, City Edge is strategically positioned to become an attractive urban extension of the city, where people will be able to live, work, and socialise.*
>
> [….]
>
> *This project considers how the regeneration of City Edge can support the delivery of new homes to cater for the various needs of our growing population, help Dublin become a climate resilient City, accommodate the next generation of employment and provide liveable spaces that connect seamlessly with the surrounding neighbourhoods.*"

The subject site is identified as 'Residential-led Mixed Use' within the CESF, as seen in Figure 8.1.

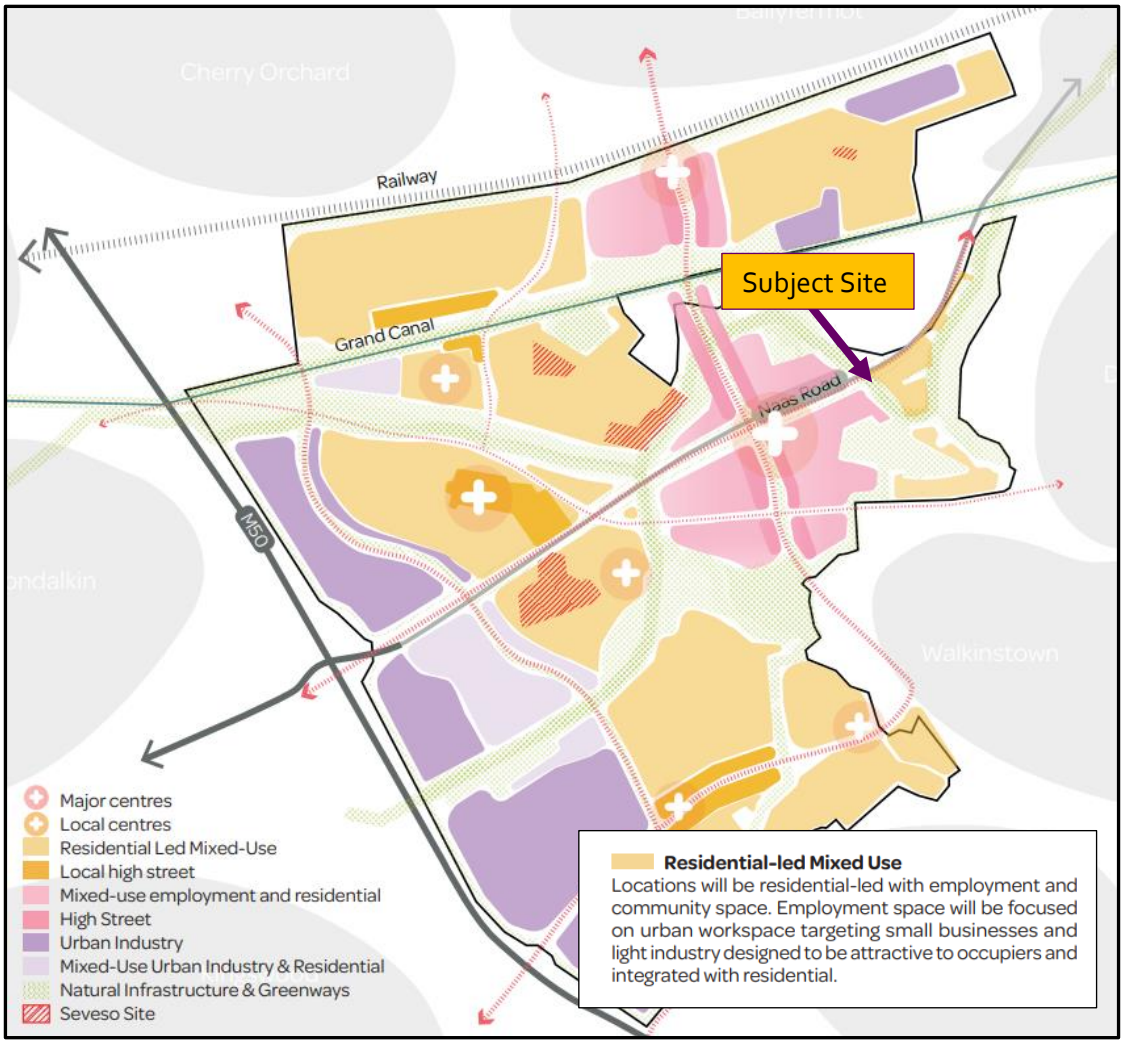

Figure 8.1: Preferred Spatial Configuration with the Subject Site Identified as 'Residential-led Mixed Use'.

(Source: *City Edge Strategic Framework* (August 2022))

According to the *Development Plan* the vision for the areas within the framework is:

> *"to create a mixed use and climate resilient high density urban quarter of the city, where citizens will be able to access affordable homes, live close to where they work, in an area home to outstanding public amenities and public transport services."*

The proposed development seeks to construct a mixed-use residential scheme consisting of 941 No. bedspaces for student accommodation, 250 sq m of retail floorspace, 5,201 sq m of amenity space, 1,533 sq m of cultural/community space and 3,000 sq m of useable public open space with a further 1,261 sq m created through the daylighting of the river.

With regard to the provision of student accommodation within the City Edge area, the Framework states:

> "Student accommodation will have a role to play in providing a mix of housing types. This will be assessed on a case by case and it will be important **to avoid an overconcentration of student accommodation in any one location / district**. In line with guidance on Student Accommodation, purpose-built student accommodation

should be provided on campuses or in **suitable locations which have convenient access to third level colleges**, especially by foot, bicycle and **high quality and convenient public transport**." [Our Emphasis]

There are no known student accommodations within a 1-kilometre radius of the subject site, therefore reducing any possibility of overconcentration of the type of accommodation in the area. By providing student accommodation in this location, it will provide easy access to a range of Higher Education Institutes such as TU Dublin in Tallaght, Ballyfermot College and Inchicore College of Further Education for example as well as easy access to the City Centre and beyond. The location of the subject site in proximity to both the Luas and bus stop allows students to safely and frequently use public transport in order to get to campus. Most notably, with the new BusConnects scheme that will benefit the subject site, one of the routes (route S4) will allow access to University College Dublin on a high frequency of every 10 minutes, with a bus stop located along Kylemore Road / Walkinstown Avenue.

The CESF further states how the presence of third level education facilities within the City Edge lands can influence third level education participation amongst the local population, which will increase future workforce in Dublin City:

"*City Edge population generally falls below both State and wider Dublin City in terms of educational attainment (for e.g. at Upper Secondary and Third Levels). Provision of a greater range of employment opportunities in the area can help open up awareness of career opportunities and stimulate improved education achievement.*

The presence of new education facilities can also increase engagement in education at both school and post-school ages."

"*Proximity to third level institutions can provide a highly educated workforce, particularly to support new / emerging future sectors.*"

It is clear that the CESF recognises the proximity of third-level institutions to the City Edge lands. By providing student accommodation in proximity to Dublin City Centre, students will be exposed to a wide variety of future employment opportunities, as recognised by the CESF. It is evident that the benefits resultant of the proposed development would not only provide students a place to live but will also provide Dublin City businesses and companies a graduate workforce.

8.2 Zoning – 'Z14'

The subject site is zoned 'Z14' where the objective is '*To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use.*'

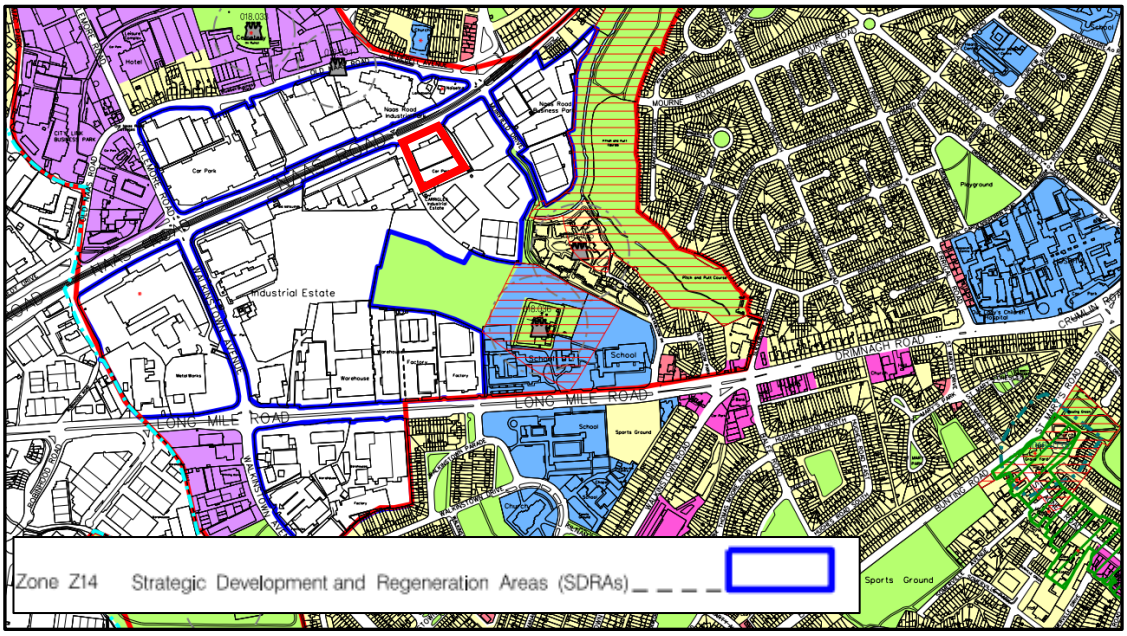

Figure 8.2: DCC Zoning Map G, Subject Site Indicatively Outlined in Red

(Source: Dublin City Development Plan 2022-2028, annotated by Thornton O'Connor Town Planning, 2023)

The *Development Plan* states that:

> "*These are areas where proposals for substantial, comprehensive development or redevelopment have been, or are in the process of being, prepared*. [....] *Z14 areas are capable of accommodating significant mixed-use development, of which residential would be the predominant use."*

The following are 'Permissible Uses' for lands zoned as Z14:

Permissible Uses
Assisted living/retirement home, beauty/ grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, Build To Rent residential, café/ tearoom, childcare facility, **community facility**, conference centre, craft centre/ craft shop, **cultural/recreational building and uses**, delicatessen, education, embassy office, embassy residential, enterprise centre, financial institution, guesthouse, halting site, home-based economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, mobility hub, office, off-licence, off-licence (part), **open space**, park and ride facility, place of public worship, primary health care centre, public house, public service installation, residential, restaurant, science and technology-based industry, **shop (local**), shop (neighbourhood), sports facility and recreational uses, **student accommodation**, take-away, training centre, veterinary surgery.

Table 8.1: List of Permissible Uses on Lands Zoned as Z14

(Source: *Dublin City Development Plan 2022-2028)*

The following are 'Open for Consideration Uses' for lands zoned as Z14:

Open for Consideration Uses
Advertisement and advertising structures, betting office, car park ancillary to main use, car trading, civic and amenity/recycling centre, cultural, creative and artistic enterprises and uses, funeral home, garage (motor repair/service), garden centre/ plant nursery, hostel (tourist), internet café/call centre, laundromat, nightclub, office-based industry, outdoor poster advertising, petrol station, pigeon lofts, postal hotel/motel, shop (district), shop (factory shop), warehousing (retail/non-food)/retail park, warehousing.

Table 8.2: List of Uses Open for Consideration on Lands Zoned as Z14

(Source: *Dublin City Development Plan 2022-2028)*

The proposed mix-used student accommodation led development is therefore considered acceptable as student accommodation, open space, retail (local shop), cultural space, and community space are appropriate land uses for Z14 zoned land as indicated in the Development Plan.

8.3 Relevant Policies within the Dublin City Development Plan 2022-2028

8.3.1 SDRA 5 - Naas Road

The *Development Plan* sets out 17 No. 'Strategic Development Regeneration Areas' ('SDRAs') across Dublin City, which identifies areas that have the potential to deliver significant quantity of homes and employment. These SDRAs will seek to address the policies and objectives set out in the *NPF* and *RSES*, with particular attention to compact growth (NSO 1), sustainable mobility (NSO 4), and the transition to a low carbon and climate resilient society (NSO 8).

As well as having site specific guiding principles, the SDRAs must follow a series of overarching principles, such as that set out in SDRA01, where an objective of Dublin City Council is:

> "*To support the ongoing redevelopment and regeneration of the SDRA's in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles:*

Principle	Requirement	Proposed Development Response
Architectural Design and Urban Design	*All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter 15 in order to create long term, viable and sustainable communities aligned with the principles of the 15- minute city.*	A detailed Architectural Design Statement prepared by HKR Architects and Landscape Design Report by Stephen Diamond Associates are submitted as part of this planning application, which sets out the design rationale of the proposed development providing a high-quality innovative scheme. Due to the site's location in relation to public transport options, students

		will be able to access various facilities and amenities in close proximity to the subject site. As well as the high accessibility to public transport, students will be able to walk or cycle to local facilities and services within a 15-minute walk or cycle.
Phasing	*Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.*	Given the proposed development is a Student Accommodation scheme with two interlinking buildings, it is expected to be delivered in a single phase.
Access and Permeability	*Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.*	Open space is provided throughout the scheme, which will be easy to navigate and will enhance permeability for the site so that students and visitors will be able to navigate their way around these spaces. The subject site has taken the opportunity to further increase height on lands at an important street junction with frontage onto Naas Road heading towards the junction of the Old Naas Road. The development will animate the streetscape and the urban grain, which will frame the junction between Naas Road and Carriglea Road and will enhance legibility and wayfinding at the subject site as there is currently no defining architectural feature that acts as a landmark to assist with wayfinding along this part of the Naas Road.
Height	*Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density.*	SDRA 5 sets out development brief's for some sites but there is none for the subject site. The proposed scheme would see development of part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 12 No. storeys (above basement level) for Block 2. The general area surrounding the site is subject to

		intense redevelopment and regeneration turning the former industrial area into a mixed-use residential-led urban quarter. These mixed-use residential developments have either been constructed, are currently being constructed, or have been granted planning permission for buildings of heights of up to 18 No. storeys or 77.6 metres.
Urban Greening and Biodiversity	*Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances.*	The daylighting of the River Camac will introduce new greenspace, tree planting and biodiversity to the subject site. The river, in its current state, is underground and unexposed, therefore a key element of the proposed development is to open up the river to introduce more green infrastructure and biodiversity to the area. The daylighting of the River Camac will provide 1,261 sq m of open space (13% of the site area) on the subject site, providing visual amenity and biodiversity net gain. Due to the future protection of the flora and fauna created, the space is not included as useable public open space. The development will see the addition of open spaces on a site that is predominantly hard standing in its current state. Public and private open spaces will include numerous tree planting and green pockets spread throughout the development to create a visually attractive environment. The public open space provided is in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway above the Riparian Zone, equating to 3,000 sq m in total or 31% of the total site area.
Surface Water Management	*All development proposals should provide for sustainable surface water management including climate change provisions and the installation of sustainable drainage systems (SuDS) in order to reduce*	The *Civil Engineering Infrastructure & Surface Water Management Report* and Drainage and Water Services Drawings prepared by Barrett Mahony Consulting Engineers provide details relating to how the

	surface water runoff and potential flooding. This should be considered in conjunction with open space design and green infrastructure, biodiversity initiatives and nature-based solutions. See Appendix 11, 12 and 13 for further detail.	proposed development will manage surface water matters.
Flood Risk	*All development proposals within the SDRA's will have regard to restrictions / measures to mitigate identified flood risk outlined in the Strategic Flood Risk Assessment (SFRA) and in particular, Appendices A, B and C including climate change provisions in the SFRA.*	As specified in the Flood Risk Assessment prepared by Barret Mahony that accompanies this Planning Report, there is no possibility of the subject site flooding in the long-term due to the specific location of the site.
River Restoration	*Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible: SDRA 1 Clongriffin/Belmayne and Environs; SDRA 3 Finglas Village Environs and Jamestown Lands; SDRA 4 Park West/Cherry Orchard; SDRA 5 Naas Road; SDRA 6 Docklands; SDRA 7 Heuston and Environs; SDRA 9 Emmet Road; SDRA 10 North East Inner City and SDRA 16 Oscar Traynor Road. See Chapter 9, Policy SI12 for further detail.*	The current River Camac located on the subject site will be daylighted. Not only will the river create a new visually attractive addition to the site, but it will also provide new green infrastructure and biodiversity, additional amenity space for students and wider population of the area to use through the construction of an elevated walkway over the river (Thus protecting the new river bed) , as well as cultural/community space.
Sustainable Energy	*Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network. Further specific guidance regarding 'District Heating Enabled' Development is set out in Chapter 15 and should be complied with. Specific guidance is set out regarding SDRA 6 (Docklands) and*	A Climate Action & Energy Statement has been prepared by Delap & Waller to respond to the energy output and performance of the proposed development.

	SDRA 10 (NEIC) where applicants must demonstrate how a proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. Guidance is also set out regarding SDRA 7 (Heuston and Environs), SDRA 8 (Grangegorman/Broadstone), SDRA 11 (St. Teresa's Garden and Environs), SDRA 14 (St. James's Healthcare Campus and Environs), SDRA 15 (Liberties and Newmarket Square) where possible connections or interconnections to existing heat networks in the area, to create a district heating 'node' must be investigated.	
Climate Change	*Proposed developments within the SDRA shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments.*	The proposed development will be subject to detailed design which prioritises the energy performance of the building. Details of the energy efficiency, conservation and use of renewable energy is detailed in the Climate Action & Energy Statement prepared by Delap & Waller.
Cultural Infrastructure	*All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development. See Objective CUO25 for further detail.*	The proposed development will include cultural and community space for students to use. There will be 729 sq m of internal cultural space, 472 sq m of internal community space, 221 sq of internal shared community and cultural space, while there will be 40 sq m of external community space and 91 sq m of external shared community and cultural space, totalling to 1,533 sq m of cultural and community space. The cultural space, totalling to 729 sq m, will principally comprise a digital hub and ancillary and storage space. Digital hubs provide space to record podcasts, a studio for you tube filming, gallery space, kitchen, photography studios, makerspace and general shared working for creatives.

		The community space, totalling to 512 sq m, will principally comprise a café, co-working areas, and ancillary space. The co-working areas provides space for people generally living in nearby residential developments to use shall they wish to work from home, whilst benefiting from an office-like experience. There is also 312 sq m of shared cultural and community space in the form of a shared reception and an accessible break-out space.

Table 8.3: Guiding Principles for SDRAs

(Source: *Dublin City Development Plan 2022-2028*, Annotated by Thornton O'Connor Town Planning, 2023)

In relation to the subject site, SDRA 5 – Naas Road is the identified Strategic Development Regeneration Area. The key sites identified in the area have been the subject of planning activity in recent years, with permission for c.3,300 No. units in the vicinity of the Naas Road/Kylemore Road junction. The subject site is not listed as a key development site as per Figure 8.3 below and thus provides no development brief, but it does acknowledge the public transport hub adjacent to the site.

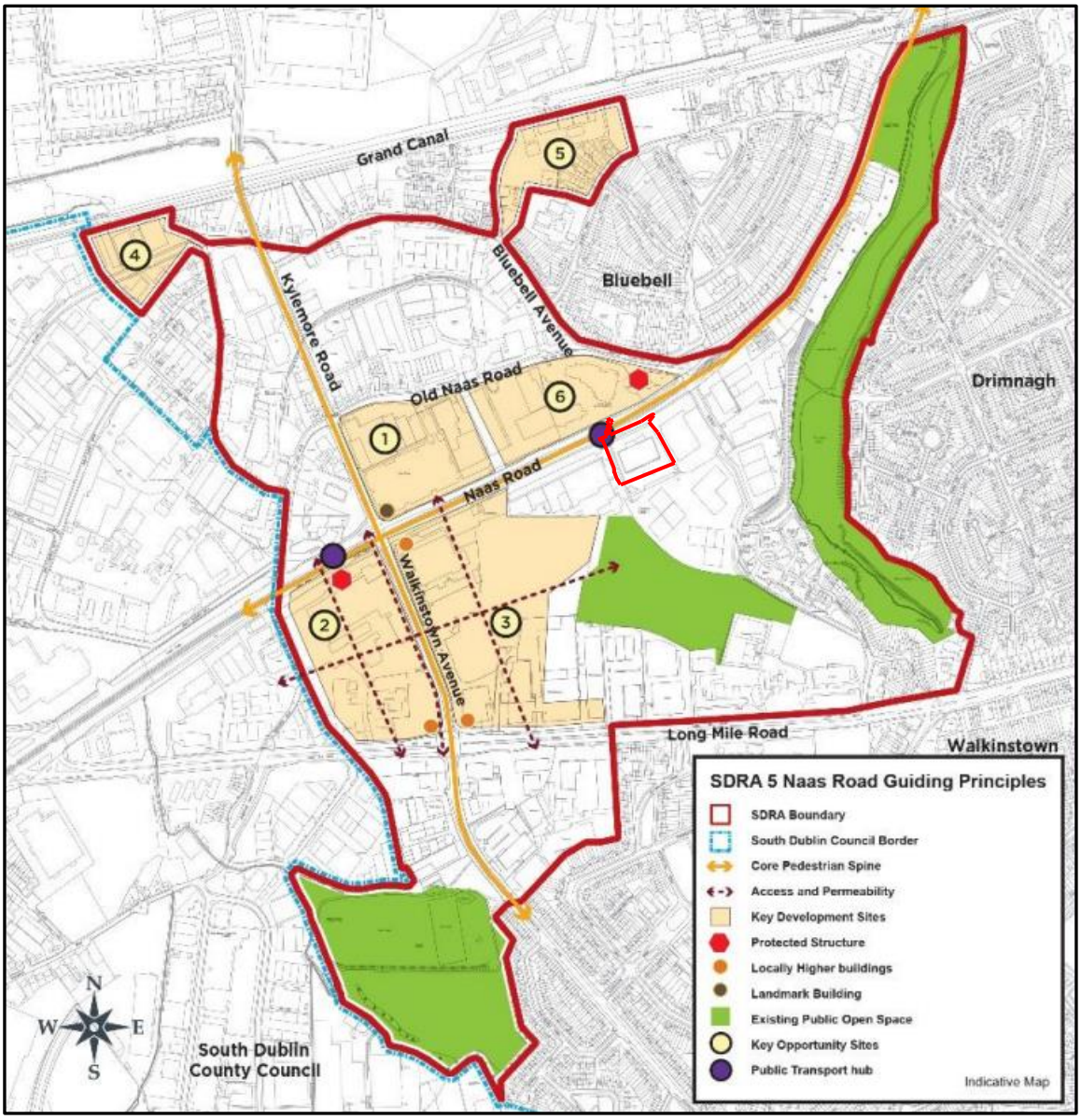

Figure 8.3: **SDRA 5 Naas Road, Subject Site Indicatively Outlined in Red**

(Source: ***Dublin City Development Plan 2022-2028*****, Annotated by Thornton O'Connor Town Planning, 2023)**

8.3.2 Student Accommodation Policies

The *Dublin City Development Plan* states the following regarding the provision of student accommodation in the city:

> *"Purpose-built student accommodation (PBSA) plays an important role in providing well managed student accommodation for the approximately 53,000 students in the city. Such schemes have also in many instances had positive impacts resulting in greater availability of housing stock in the private residential sector to meet housing demands and transformative regeneration benefits.*
>
> [....]

As identified by the National Student Accommodation Strategy, by developing and utilising an appropriate Management Plan for PBSA, the managers of PBSA can minimise any potential negative impacts from the PBSA developments and their 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."

Policy	It is a Policy of Dublin City Council:
QHSN45	***Third-Level Student Accommodation*** *"To support the provision of high-quality, professionally managed and purpose built third-level student accommodation in line with the provisions of the National Student Accommodation Strategy (2017), on campuses or in appropriate locations close to the main campus* ***or adjacent to high-quality public transport corridors*** *and cycle routes, in a manner which respects the residential amenity and character of the surrounding area, in order to support the knowledge economy. Proposals for student accommodation shall comply with the 'Guidelines for Student Accommodation' contained in the development standards chapter. There will be a presumption against allowing any student accommodation development to be converted to any other use during term time."* [Our Emphasis]

With regard to Policy QHSN45, the proposed development will be a very high-quality scheme that will be professionally managed. The closest Luas stop to the subject site is Bluebell Luas Stop, located c. 150 metres to the east of the subject site, or a c.2-minute walking distance. Other nearby Luas stops are Kylemore and Blackhorse, both less than a kilometre from the subject site. The Line that serves this Luas stop is the Red Line which provides access between Connolly Station or The Point to either Saggart or Tallaght. The Luas allows access to the city centre in less than 20 minutes or southbound towards Tallaght and Citywest in less than 30 minutes. The Luas will be available for the future students of the proposed accommodation to use, providing routes to various locations in Dublin frequently.

There are various bus stops located in close proximity to the subject site, with the closest one being stop No. 1954, situated c. 150 metres east from the site. The closest stop to provide access towards Dublin City is located c.500 metres west of the subject site, with the stop No. 4406. These stops serve Dublin City Bus route Nos. 13, 68/A and 69. Another bus stop is located on Walkinstown Avenue that serves Dublin City Bus route No. 18.

It is noted that the CESF states the following on page 127:

"As set out in the previous sections of the Movement Framework, City Edge has adopted a transit orientated approach which will provide all future residents with efficient access to high capacity public transport as well as access to essential daily services within a 15 minute walk or cycle"

The country will see an upgrade to its public transport through the introduction of a new bus network across major cities in Ireland, namely BusConnects. As part of BusConnects Dublin, the bus network will be re-designed, and a more legible and accessible transport network created. There are 2 No. bus routes that are proposed in close proximity to the site, with one bus route passing Naas Road and the other one passing Kylemore Road and Walkinstown Avenue.

The current and emerging route network in the vicinity of the subject site will provide students with access to various third level campuses and Higher Education Institutes frequently and safely. Therefore, it is considered that the proposed development for student accommodation is wholly in accordance with the requirements set out in Policy QHSN45 of the *Dublin City Development Plan 2022-2028.*

Overconcentration of Student Accommodation

In assessing proposals, Section 15.13.1 of the *Development Plan* states that:

> *"the planning authority will have regard to the pattern and distribution of student accommodation in the locality, and will resist the overconcentration of such schemes in any one area, in the interests of achieving a sustainable mix of development, whilst also providing for successful urban regeneration, good public transport/cycling/ walking connectivity, and the protection of residential amenity."*

Policy 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.

In this regard, there is no proliferation of student accommodation in this area and in fact the area is under provided for in this regard. By providing student accommodation in this location, it will provide easy access to TU Dublin, Ballyfermot College and Inchicore College of Further Education for example as well as easy access to the City Centre and beyond. Most notably, with the new BusConnects scheme that will benefit the subject site, one of the routes (route S4) will allow access to University College Dublin on a high frequency of every 10 minutes.

Unit Mix

Section 15.13.1.1 of the *Development Plan* describes student accommodation to be of:

> *"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 bedroom unit."*

Minimum bedroom sizes for student accommodation clusters are as the following:

Bedroom Type	Minimum Bedroom Size	Minimum Bedroom Size Including En-Suite
Single Study	8 sq m	12 sq m
Twin Study	15 sq m	18 sq m
Disabled Study	-	15 sq m

The proposed development will see the delivery of 871 No. standard rooms, 47 No. accessible rooms, and 23 No. studios. Each room will be a minimum of 12 sq m and each accessible room and studio will be a minimum of 25 sq m. All bedrooms will have their own en-suite. The proposed cluster type will range is 3 No. students to 8 No. students per cluster and varies per

floor level. The minimum area of a 3 No. student cluster is 66 sq m, for a 4 No. student cluster it is 92 sq m, for a 5 No. student cluster it is 123 sq m, for a 6 No. student cluster it is 140 sq m, a 7 No. student cluster is 154 sq m, and the maximum for an 8 No. student cluster is 160 sq m, all of which accord with Section 15.13.1.1 of the *Development Plan.* Please refer to the Housing Quality Assessment Table prepared by HKR Architects for further details of each clusters floor area.

Daylight and Sunlight

In relation to the Daylight and Sunlight standards for student accommodation, Section 15.13.1.2 sets out that:

> "*Student accommodation should be designed to give optimum orientation in terms of daylight to habitable rooms. Given the nature of student occupancy, the residential standards in relation to dual aspect may be relaxed. Proposed developments shall be guided by the principles and standards set out in Appendix 16*."

In order to maximise the level of daylight each cluster receives, 67% of the total 123 No. clusters have been designed to be dual aspect and any single aspect clusters do not face north. Please see the Housing Quality Assessment Table in the *Design Statement* provided by HKR Architects for further details on which clusters are dual aspect.

In regard to the proposed development, the submitted preliminary Daylight and Sunlight Analysis as prepared by 3D Design Bureau demonstrates the following compliance rates with the BRE Guidelines (BRE 209):

Component	Compliance Rate
Spatial Daylight Autonomy (SDA)	
Without Trees	c. 96%
Trees in Winter State (Proposed and Existing Trees)	c. 95%
Sunlight Exposure (SE)	
Trees in Summer State (Proposed and Existing Trees)	c. 94%
SE With Trees as Opaque Objects	c. 88%
SE Without Deciduous Trees	c. 88%
Sun On Ground (SOG) in Proposed Amenity Areas	
Public Open Space	100%
Communal Open Space	100%[12]

The Daylight and Sunlight Analysis also demonstrated the following compliance rates with the SDA under I.S. EN 17037 Criterion:

Component	Compliance Rate
Without Trees	c. 90%
Trees in Winter State (Proposed and Existing Trees)	c. 88%
Trees in Summer State (Proposed and Existing Trees)	c. 87%

[12] The Daylight and Sunlight Assessment Report states the following regarding the SOG of the Communal Open Space: "*The four proposed student amenity spaces have all been assessed with the average of these spaces giving the overall compliance. All communal open spaces will be accessible by future residents.*"

Communal Facilities

Section 15.13.1.3 of the *Development Plan* highlights that communal facilities must be provided for Students, both internally and externally. The requirements for communal facilities in student accommodation are set out as the following:

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

The proposed development seeks to include 5,201 sq m of communal amenity space. This will be provided through 4,027 sq m (77%) of internal amenity space and 1,174 sq m (23%) of external amenity space. Due to the requirement to provide 5% cultural/community space and 10% public open space, the majority of the private amenity space is provided internally. The following table demonstrates the area of the amenity space and at what ground level it will be located:

Floor	Internal (sq m)	External (sq m)
Basement	897	338
Ground Floor	1,037	160
First Floor	2,093	0
Second Floor	0	387
Nineth Floor	0	289
Total	4,027	1,174
Overall Total	**5,201 sq m**	

Table 8.4: Proposed Internal and External Student Amenity Space

(Source: HKR Architects)

The proposed development provides 5,201 sq m of combined internal and external communal space, equating to 5.53 sq m of communal space per bedspace, as well as a minimum of 4 sq m per bedspace of kitchen / living / dining space in each cluster and studio. This brings the total communal space for the proposed development to a minimum of 9.53 sq m per bedspace, which is fully in accordance with the requirements of the *Development Plan.*

Key Point: It is of note that there is 70 sq m of external amenity space at first floor level of Block 2, however, this space does not meet the BRE Guidelines for appropriate levels of daylight and sunlight and is thus removed from the total useable amenity space. If the 70 sq m is included in the total student amenity space, the communal space per bedspace would increase to 5.6 sq m, and in conjunction with the 4 sq m per bedspace of kitchen / living / dining space in each cluster and studio, the total communal space for the proposed development would be 9.6 sq m per bedspace.

[13] It would appear that reference to 13 sq m may be a mistake and this figure should read 11 sq m, i.e., 7 sq m +4 sq m = 11 sq m.

Car Parking / Bicycle Parking

Section 15.13.1.4 of the *Development Plan* states that car parking provision will not be supported in student accommodation developments within Dublin City. However, in Table 2 of Appendix 5 of the *Development Plan*, the stated maximum car parking standards for student accommodation in Zone 2 is 1 per 20 bed spaces. The proposed development seeks to utilise the nearby public transport options as well as to promote cycling rather than using personal cars. In order to reduce carbon emissions both on-site and in the surrounding area, the proposed development seeks to provide only 7 No. car parking spaces. As stated in Appendix 5 of the *Development Plan:*

> "*Residential parking spaces are mainly to provide for car storage to support family friendly living policies in the City.* ***It is not intended to promote the use of the car within the City****. If the car space is not required in the short-term, it should be given over to other residential storage or utility uses.*" [Our Emphasis]

Car parking spaces will be principally dedicated to the staff of the proposed development only but will be managed by the Operator of the scheme to address the needs of any disabled student who may need parking. This number of parking spaces is considered acceptable as many students will be attending various Higher Education Institutes that are located within a short walking distance from Luas and bus stops, and students will be able to cycle or walk to nearby facilities and services located in the vicinity.

The proposed development will provide 941 No. secure bicycle spaces for students located on the ground floor and lower ground floor level in Block 1. Students will be able to store their bikes safely through a dedicated enclosed space, which has ramp access to the upper and lower floors. Section 15.13.1.4 of the *Development Plan* states that a "*minimum of one cycle parking space per resident should be provided within the development as well as additional visitor parking at surface level at a rate of 1 per 10 no. residents*". This would require 94 No. visitor spaces. However, we further note that Table 1 of Appendix 5 states a requirement of 1 No. visitor space per 5 No. bedrooms for visitors requiring 188 No. cycle parking spaces. These have all been provided through the scheme as per the Landscape Masterplan along with additional cycle spaces for the proposed retail unit and cultural and community spaces:

In total, 218 No. external spaces are provided for visitors/retail unit/cultural and community spaces, as well as 3 No. internal spaces for the retail, cultural and community space.

By providing bicycle spaces for future students, staff and visitors, they will have the option to cycle, walk or use public transport, all of which are more of a sustainable option to the use of cars.

Temporary Use as Tourist Accommodation

Section 15.13.1.5 of the *Development Plan* states the following:

> "*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.*"

It is proposed that the student accommodation will provide tourist accommodation principally during the summer months when students leave to go back home for the summer.

Given the site's location, it is anticipated that summer lets will be to international language students as opposed to families for example. The proposed layout of the student accommodation will also be better suited to individuals rather than families.

The provision of tourist accommodation for international language students will contribute to the dearth of supply of such accommodation during the summer months. It will ensure that the activity and vibrancy resultant of the students during the college year will continue during the summer months. Like with the student accommodation rates, it is anticipated that these will be less than City Centre locations, thus the scheme seeks to provide 'accommodation for all'.

The provision of this type of accommodation is appropriate given the location of the subject site to the nearby high-quality public transport options, providing international language students visiting the country with fast and easy access into the City Centre.

8.3.3 Residential Development

The proposed mixed-use residential development will consist of 941 No. bedspaces for student accommodation on suitably zoned land for regeneration. The following policies and objectives in the *Development Plan* are of most relevance to the proposed residential development:

Objective / Policy	It is an Objective / the Policy of Dublin City Council:
CSO7	**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.
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.
SC11	**Compact Growth** In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities 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.

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.
SC13	**Green Infrastructure** To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.
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 development is located within land zoned as 'Z14' where the objective is '*To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use'* as well as being designated as a '*Strategic Development and Regeneration Area'* (SDRA 5 – Naas Road). In this regard, the principle of development of regenerating an underutilised site, located along a strong public transport corridor, to provide 941 No. student accommodation bedspaces is considered fully compliant with Objective CSO7.

Given the mixed-use nature of the site, plot ratio is an appropriate density measure on this site. For Z14 lands, an indicative plot ratio of 3 is guided. The proposed development has a plot ratio of 3.2 and thus slightly exceeds this indicative figure. However, having regard to its location adjacent to high quality public transport, its position fronting a watercourse and the creation of a new streetscape, it is considered the proposal is consistent with Policies QHSN10 and SC11.

The design of the proposed scheme has been extensively considered with regard to the surrounding context. The area surrounding the subject site is under intense regeneration with the character subsequently moving from industrial land to mixed-use residential, albeit principally apartment developments. In response to the change in surrounding character, the proposed scheme seeks to provide well-designed and high-quality architecture that will integrate well with nearby mixed-use residential development. The mix of uses on site including student accommodation will provide a different housing mix in the area in accordance with Policy SC12.

Private communal amenity space will be provided for students of the accommodation to enjoy, as well as public open space in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway (above the Riparian Zone). The daylighting of the River Camac will allow more space to become available on site and will provide new biodiversity and visual amenity to the site, but is not considered as useable public space as it will only be accessed for maintenance purposes. This will provide a vast range of green infrastructure and biodiversity on site where there is currently little to no such elements fully in accordance with Policy SC13. The provision of communal amenity space will allow students to interact with each other, creating a sense of place for them to socialise. The public will also

be able to socialise in separate spaces to that provided for the students, thus creating a diverse and integrated space.

The concept of the 15-minute city is highly relevant to the proposed development as the scheme has been designed to a high standard, incorporating a sense of healthy placemaking through the provision of accessible, safe and inclusive spaces. The location of the subject site to the Bluebell Luas stop and various bus stops encourages future students to utilise these options, bringing them to a multitude of locations and destinations frequently. The proposed development is therefore considered relevant under the concept of Policy QHSN11.

8.3.4 Regeneration and Intensification

The densification of the subject site responds positively to the surrounding context with many sites having been constructed or planning permission granted to redevelop similar industrial estate land. This includes the residential development to the south of the subject site, permitted under the parent permission DCC Reg. Ref. 4244/15, along with a further SHD permission as detailed in this Report. That application is only one of the many examples for intense regeneration on low-density and underutilised sites in the immediate area, which has already been discussed in Section 4.2 of this Planning Report.

Policy	It is the Policy of Dublin City Council:
CEE19	**Regeneration Areas** To promote and facilitate the transformation of Strategic Development and Regeneration Areas (SDRAs) in the city, as a key policy priority and opportunity to improve the attractiveness and competitiveness of the city, including by promoting high-quality private and public investment and by seeking European Union funding to support regeneration initiatives, for the benefit of residents, employees and visitors.

The proposed development includes the regeneration of an underutilised and suitably zoned land in an urban location, in proximity to public transport options and other facilities and services. The change in character of the surrounding area through intense regeneration is considered a positive action where mixed-use residential schemes are considered to address the critical supply of housing in Ireland. The proposed scheme seeks to provide much needed student accommodation in Dublin City, which will ultimately alleviate the pressure amongst the private rental sector as students will be provided with PBSA, rather than taking up bed spaces elsewhere. The provision of student accommodation by private developers will provide student accommodation with no requirement for investment by the Government, potentially allowing funds to be utilised elsewhere. The proposed development therefore complies fully with Policy CEE19 and CCUV22 of the *Development Plan.*

8.3.5 Built-Form: Site Coverage, Plot Ratio and Height

Development management standards and thresholds relating to site coverage, plot ratio and height work in conjunction with each other to define the bulk and scale of a development. This is then articulated and defined to distribute the massing as an appropriate and attractive built form. Generally, when particular site coverage and plot ratio standards are set, they inform the height of a development.

8.3.5.1 Site Coverage and Plot Ratio

The site coverages and plot ratios set by the *Development Plan* is set out in the table below and are noted as being *"indicative"*, thereby indicating flexibility with respect to their applicability. In relation to the area in with the subject site is located in is the 'Regeneration Area' (as it is included in the SDRA 5 – Naas Road).

Parameter	Site Coverage	Plot Ratio
Development Plan	50-60%	1.5-3.0
Proposed Development	29%	3.2[14]

The Site Coverage falls below the indicative parameters prescribed indicating the extensive quantum of open space proposed on the site, representing some 43% of the site area.

The proposed Plot Ratio marginally exceeds the indicative guide provided proposing a Plot Ratio of 3.2. However, the *Development Plan* states the following in respect of higher plot ratios:

> "*Higher plot ratio and site coverage may be permitted in certain circumstances such as:*
>
> - ***Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed.***
> - ***To facilitate comprehensive re-development in areas in need of urban renewal.***
> - ***To maintain existing streetscape profiles.***
> - *Where a site already has the benefit of a higher plot ratio.*
> - *To facilitate the strategic role of significant institution/employers such as hospitals.*" [Our emphasis]

It is our Opinion that three of the five scenarios above apply to the subject site, allowing the opportunity to explore a higher plot ratio on the subject site. The subject site is within 150 No. metres of a Luas and bus stop, will contribute to the comprehensive regeneration that is ongoing in this area and will create a streetscape profile to match the new streetscape granted permission to the west of the site.

The proposed development, therefore, is considered to be of an appropriate scale and is firmly asserted as being a prime example of a high-quality, landmark scheme that includes a taller structural element. It is supported by policy which seeks to efficiently and sustainably use well-connected and well-served land within existing settlements.

8.3.5.2 Height

The proposed development will consist of part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 11 No. storeys (above basement level) for Block 2. The following policies of the *Development Plan* are most relevant regarding the height of new buildings in Dublin City:

[14] Plot Ratio calculation = Gross floor area above ground floor level (30, 386 sq m) divided by the developable site area (9,622 sq m) = 3.1579, which is then rounded to 3.2.

Policy	It is the Policy of Dublin City Council:
SC15	**Building Height Uses** To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.
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 (in accordance with the criteria for assessment set out in Appendix 3); • 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.

The *Development Plan* reflects national policy in respect of building height as detailed in *Urban Development and Building Heights Guidelines for Planning Authorities* (Height Guidelines). The *Development Plan* has sought to accommodate a more flexible and pragmatic approach to the attainment of height given its recency and having been directed by SPPR1 of the Height Guidelines, which states:

> *"In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height."*

Specifically, in respect of SDRAs, the *Development Plan* states the following:

> *'SDRA locations are considered particularly appropriate for higher buildings and density as per the guiding principles and Framework Plans set out in Chapter 13 in each case'.*

The Naas Road SDRA is specifically referenced in this context although it is noted that no prescriptive policy is provided for the subject site. In this regard the subject scheme will be assessed in the context of certain 'performance criteria' relating to building height, as set out in the table below (Table 3 of Appendix 3 of the *Development Plan*).

Objective	Criteria	Proposed Development
1 - To promote development with a sense of place and character	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.	The proposed development has been designed to the highest quality to respond positively to the surrounding regenerating area. The proposed scheme seeks to integrate contextually within its immediate surroundings by providing buildings of similar heights and scale of recently constructed / permitted development, as well as providing a new streetscape for Naas Road. Specifically, at its southern and western edges it reflects the height of adjoining permitted Carriglea and Concorde developments whilst exploring the opportunity to step up at the corner of the as it adjoins the Naas Road with the opposite corner providing a large public plaza. The acceptability of taller buildings in this location has already been deemed appropriate with an 18 No. storey development (DCC Reg. Ref. 4238/19) and a 15 No. storey development (DCC Reg. Ref. 3228/20) already granted in vicinity. The adjacent Concorde site was granted permission for 10 No. storeys (30 metres), therefore, HKR Architects have proposed gradual increases in height. Block 2, which is closest to the Concorde Site, ranges from 9 No. storeys to 11 No. storeys. The proposed modulation in height contributes to a broken and dynamic skyline with the various range in heights along the Naas Road. This subsequently avoids blanket building extensions which can result in a monotonous urban realm. This approach to the design has clearly sought to respond to the surrounding heights of recently permitted developments. The step-down approach in both Block 1 and 2 reduces

		the perceived bulk of the buildings, which is also aided by the various materials and colours proposed.
	Have a positive impact on the local community and environment and contribute to 'healthy placemaking'.	The proposed development will result in the redevelopment and regeneration of a key underutilised site, thereby enhancing the public realm and healthy placemaking through the creation of a more attractive and desirable environment. The proposed development will have a positive impact on the local community via the daylighting of the River Camac and the creation of new public open spaces through the sites, some of which link to the Carriglea linear park. The development also provides cultural and community spaces and a retail unit that will be available to the local community.
	Create a distinctive design and add to and enhance the quality design of the area.	The proposed design is thoroughly detailed in HKR Architect's material specification. The development will significantly improve the built-form and design at the site, which is currently comprised of a warehouse/office unit. The carefully designed, shaped and modulated development creates an attractive proposition along the Naas Road. Perhaps the most distinctive part of the design of the proposal is the provision of the daylighted River Camac through the site which provides the opportunity to create a new biodiverse public space though the site. An elevated walkway above the River Camac is provided where students and members of the public can enjoy the beautifully landscaped and new biodiverse area below. The daylighting of the River Camac and the elevated walkway above is something that is not seen in Dublin, and so it is considered that this new experience will bring many environmental, social and economic benefits to the site and surrounding area.

	Be appropriately located in highly accessible places of greater activity and land use intensity.	The subject site is within 150 metres of the Luas Red Line stop at Bluebell and is proximate to numerous bus stops, providing direct access to Dublin City Centre. See Section 2.3 for full details of the site's locational attributes and connectivity. The development will, in its own right, increase the activity and land-use intensity at this location by way of its mix of uses. In addition, they will play a role in catalysing and supporting the wider redevelopment regeneration of other industrial, warehousing and commercial lands in the area, as envisaged by the CESF.
	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.	Variation in height, scale and form have been detailed in response to the first criterion above. The approach has sought to respond to the surrounding permitted heights, with developments granted permission for 15 No. to 18 No. storeys along the Naas Road. Most notably, the adequate distance of the proposed buildings to the adjacent Carriglea site to the south and Concorde site to the west, in combination with the stepped approach of the buildings heights, transitions positively to the adjacent buildings so as not to cause any overbearing impacts. The modulation of height on this site is particularly important given the long expanse of uniform building height at the adjacent Concorde development which has a significant amount of frontage onto the Naas Road.
	Not be monolithic and should have a well considered design response that avoids long slab blocks.	The proposed development is not monolithic in its design, with no long stretches of block that are not fenestrated or articulated. The proposed buildings have been designed by a highly experienced Design Team, taking into consideration the character of the surrounding area, and how the buildings will create new, active frontage onto Naas Road.

		The modulation of the buildings and 'stepping down' approach to the various levels, ensures that the proposed development will break down the mass of the building. The modulation effect breaks up larger elements of the building by providing different materials and textures. Different colour tones on the panels are to be used to add variety and visual interest. There will be horizontal banding made from precast panels with vertical moulds in order to break up the design vertically. Please refer to the *Design Statement* prepared by HKR Architects submitted herewith for more details.
	Ensure that set back floors are appropriately scaled and designed.	The setting back of upper levels is proposed as a means to gradually increase heights, while respecting the surrounding heights of buildings in the area.
2- To provide appropriate legibility	Make a positive contribution to legibility in an area in a cohesive manner.	The new streetscape enclosed by a high-quality design will enhance passive surveillance and legibility for the area. The design, scale and rhythm of the built-form make the scheme a highly legible proposition. Carefully considered fenestration, enhancement of façade treatments, activation of street frontages and setting back of upper floors all combine to define the scheme's legibility. The Design Team have comprehensively considered the scheme layout and modulation in order to ensure that the development improves legibility in the area and will integrate into the surrounding context.
	Reflect and reinforce the role and function of streets and places and enhance permeability.	The proposed development will redefine the streetscape along Naas Road. It proposes an increase in pedestrian access along the northern boundary of the site, bringing structures forward and activating the ground floor level at Block 2 by providing a retail unit fronting the Naas Road. Public open space will be easy to navigate and will enhance permeability for the site so that students and locals

		will be able to navigate their way around the site and continue on to the Carriglea site to the south.
3 - To provide appropriate continuity and enclosure of streets and spaces	Enhance the urban design context for public spaces and key thoroughfares.	There will be 3,000 sq m of Public Open Space provided in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway (above the Riparian Zone). The Central Plaza is located to the northwest of the site, fronting the Naas Road. At this location, it opens up the site to the Naas Road, making it a more inviting and hospitable environment. The most interesting public open space proposed is the elevated walkway above the River Camac
	Provide appropriate level of enclosure to streets and spaces.	The proposed scheme seeks to enclose both the Naas Road and the extensive public open spaces provided through the site through the provision of taller building forms. For the first time, a building of scale and proportion will front and enclose the Naas Road, replacing an existing unsustainable low-rise office/warehouse unit.
	Not produce canyons of excessive scale and overbearing of streets and spaces.	Although the tallest element of the proposed development is 15 No. storeys (above lower ground floor and basement level), the modulation and variation in heights between Block 1 and 2 is such that it ranges from 2 No. storeys to 15 No. storeys for Block 1 and 9 No. storeys to 11 No. storeys for Block 2. The surrounding context of the subject site is under intense regeneration, with permissions granted for buildings of similar heights and taller to that proposed. The avoidance of monolithic built-form that fails to connect to the context and is not of human scale has been a priority of the Design Team.
	Generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3.	The concept of pursuing a scheme that is perceived as being of human scale has been applied in the design. Heights vary throughout the scheme by way of modulation and setbacks. Therefore, in our opinion, they do not appear as overbearing. The approach to materials, which include different colours and

		textures, make the scheme visually accessible and intriguing and in combination with each other, give a sense of scale due to their relative size.
	Provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.	Ample passive surveillance is provided throughout the development. All public open spaces are overlooked by the student accommodation and cultural and community uses located in Block 2. The public open space has been designed and positioned to create a safe and inviting space for students of the accommodation and residents of surrounding granted mixed use residential developments. Most notably, the public open space will connect the Carriglea site to the south with the Naas Road. The ground floor retail unit to the northern part of Block 2 will generate a high-level of footfall within the site by providing a convenience shop for students of the development and surrounding area to use. There are multiple entrance points to the buildings including at basement, lower ground and first floor levels with each space providing active and usable external space ensuring a highly enlivened building.
4 - To provide well connected, high quality and active public and communal spaces	Integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport.	New public open areas, an important aspect of creating an attractive urban realm and streetscape, are proposed. The site currently does not provide any form of public open space and is solely comprised of a warehouse/office unit and hard standing in nature. The proposed development seeks to include 3,000 sq m of useable public open space, which is 31% of the total site area. This Carefully designed planting and surfaces have been proposed by Stephen Diamond Associates that will benefit students of the accommodation as well as future residents of the granted mixed use residential developments in the surrounding area.

		The scheme prioritises cyclists and pedestrians by focusing on spaces and facilities for these users and substantially reducing parking on the site.
	Be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards.	The design of the buildings contributes to the useability and attractiveness of the public and communal open spaces by using a stepped approach to provide relief in the facades. In turn, these spaces feel less enclosed and do not feel excessively overlooked. The daylighting of the river provides a vertical depth to the site which also contributes to an open perception on the site.
	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.	Please see Section 8.2.2 for a summary of the compliance rates of the proposed development with the BRE 209 and the I.S. EN 17037 Criterion, which is taken from the submitted *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau.
	Ensure the use of the perimeter block is not compromised and that it [is] utilised as an important typology that can include courtyards for residential development.	This is not considered relevant for, or applicable to, the proposed development.
	Ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated.	A *Microclimatic Wind Analysis and Pedestrian Comfort Report* has been prepared by IN2 and submitted under a separate cover. It was concluded that the development would not introduce any critical impact in terms of wind velocity on the external communal and public open spaces. The development is designed to be a high-quality environment for the scope of use intended and will provide comfortable and pleasant pedestrian activity.

	Provide for people friendly streets and spaces.	The proposed communal amenity spaces have been designed to encourage integration and socialise with one another. These spaces are intended to reduce the refinement of students to the bedroom and instead create an inviting space where students can get to know one another, thus creating people friendly spaces. The proposed cultural and community spaces will provide for social interaction amongst students of the accommodation and the surrounding population. The proposed public open space is a positive and important part of the proposed development as the subject site, in its current form, does not provide any public open space for local residents to enjoy. The proposed layout of the public open space allows legible and easy access throughout the site to connect Naas Road to the public park located directly to the south of the subject site at the Carriglea site.
5- To provide high quality, attractive and useable private spaces	Not compromise the provision of high quality private outdoor space.	This is not considered relevant for, or applicable to, the proposed development as there is no requirement for private amenity space to be provided for in PBSA. Nevertheless, there is 1,174 sq m of external communal amenity space for students of the accommodation to enjoy. This space is distinguishably separated from the public open space proposed, and access will only be allowed for students of the accommodation. The outdoor terrace at basement level will be used as an outdoor exercise area in which students can bring an exercise matt outside and stretch, do yoga, meditate, free weight exercises or bring out various weights. The ground floor level space will provide a dedicated external study area for students to get some fresh air whilst studying or writing any assignments, with desks, chairs and

		benches provided. A roof garden is provided at second floor level of Block 1 whereby students can socialise with one another surrounded by a high-quality landscape design that promotes healthy placemaking and an enjoyable space. Another roof garden is proposed at the nineth floor of Block 2, providing a space for students to socialise and interact with one another, while being surrounded by a high quantum of landscape.
	Ensure that private space is usable, safe, accessible and inviting.	The contemporary design of the proposed scheme provides for versatile private units with a shared communal living/kitchen/dining room within each cluster as well as some larger studio units.
	Ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards.	The scheme will enjoy excellent daylight as detailed in the preliminary *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau.
	Assess the microclimatic effects to mitigate and avoid negative impacts.	A *Microclimatic Wind Analysis and Pedestrian Comfort Report* has been prepared by IN2 and submitted under a separate cover. As stated above, it was concluded that the development would not introduce any critical impact in terms of wind velocity on the external communal and public open spaces. The development is designed to be a high-quality environment for the scope of use intended and will provide comfortable and pleasant pedestrian activity.
	Retain reasonable levels of overlooking and privacy in residential and mixed-use development.	Inappropriate levels of overlooking have been avoided as part of the proposed development's design, with a balance struck between protecting privacy and residential amenity and ensuring adequate passive surveillance is secured. Having regard to the fact that the building fronts onto 2 No. roads and the gable of an existing factory building and the separation distance between the blocks to the north of the Carriglea development (c. 25 metres), it is not

		considered that material overlooking will occur. It is also noted that Student Accommodation does not provide balconies which are more overbearing than a bedroom window.
6 - To promote mix of use and diversity of activities	Promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure.	In accordance with this criterion and the principles of the Z14 land-use zoning, the proposed development is inherently mixed-use in nature. Whilst the student accommodation is the primary use, a retail unit, cultural space and community space are also proposed. These commercial and social/community uses will serve the development's future students, as well as existing and future residents in the area in support of the '15-minute city' concept.
	Contribute positively to the formation of a 'sustainable urban neighbourhood'.	The surrounding area of the subject site is undergoing intense regeneration as part of the vision set out in the now expired Naas Road LAP, the *Development Plan* and City Edge Strategic Framework to regenerate key underutilised sites in the Naas Road area to provide for mixed-use residential developments. The proposed student accommodation will provide a tenure diversity and mix, with the students bringing a different population cohort into the area, who can work in and utilise the commercial facilities provided in the subject application and the commercial/retail facilities in the surrounding granted permissions and wider area, thus contributing positively to the formation of a 'sustainable urban neighbourhood'.
	Include a mix of building and dwelling typologies in the neighbourhood.	As the proposed development is the only student accommodation proposed in the area, the scheme will contribute to the provision of a sustainable urban neighbourhood, allowing people at different stages of life locate in this new urban quarter.
	Provide for residential development, with a range of housing typologies	At a site-specific level, this is not considered relevant for, or applicable to, the proposed development.

	suited to different stages of the life cycle.	Nevertheless, there are 47 No. accessible studios proposed to cater for students with additional needs. These studios are fully wheelchair accessible and are equipped with large en-suites. On a more macro level, the development will introduce a different residential type into the area in a different stage of the life cycle than is currently being catered for in the wider Naas Road lands.
7 - To ensure high quality and environmentally sustainable buildings	Be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light.	The modulation of height, which varies from 2 No. to 15 No. storeys for Block 1 and from 9 No. to 11 No. storeys for Block 2, ensures that the proposed development is not monolithic in its built-form, with its scale and massing distributed appropriately. Shifted height and massing allow for natural ventilation to be achieved, with no long and unbroken section of building proposed. Please see the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau for a detailed analysis of natural daylight and sunlight.
	Not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain.	Please see the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau for a detailed analysis of natural daylight and sunlight.
	Ensure a degree of physical building adaptability as well as internal flexibility in design and layout.	The buildings provide greater floor-to-ceiling heights at ground level allowing for adaptability of these spaces. Regarding the student bedspaces, a range of options are provided from 3-8 No. bedspace clusters to studios to accessible rooms.
	Ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive.	HKR Architects have sought to minimise rooftop plant and infrastructure, as demonstrated in their submitted architectural materials and the CGIs and Verified View Photomontages prepared by 3D Design Bureau in the *Townscape and Visual Impact Assessment* prepared by Modelworks.

		The inclusion of the parapets hides these features.
	Maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage.	A total of 84 out of the 123 No. clusters proposed are dual aspect in their design, equivalent to 68.3%. Given the requirement for dual aspect units is relaxed for student accommodation (as stated in Section 15.13.1.2 of the *Development Plan*), this is a high rate of provision.
	Be constructed of the highest quality materials and robust construction methodologies.	This design principle has been applied in the proposed development. Pre-cast concrete panels is the predominant material used as it is more robust and requires low maintenance and upkeep.
	Incorporate appropriate sustainable technologies, be energy efficient and climate resilient.	Public lighting will be from LED fittings, reducing energy consumption and prolonging the life of materials and fixtures. Domestic hot water will be provided from the air source heat pumps. Full details of the intended sustainable technologies, energy efficiencies and climate resilience are detailed in Delap & Waller's *Climate Action, Energy and Sustainability Statement.*
	Have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sun lighting proposals. Where appropriate, satisfactory, alternative compensatory design solutions should be provided for a failure to meet reasonable daylighting provisions, in the context of a constrained site or securing wider objectives such as comprehensive urban regeneration or an effective urban design and streetscape solution.	Please see the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau for a detailed analysis of natural daylight and sunlight.
	Incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water	Please refer to the *Civil Engineering Infrastructure & Surface Water Management Report* prepared by Barrett Mahony Consulting Engineers.

	infrastructure and nature based SUDS solutions are in place.	
	Include a flood risk assessment.	A *Flood Risk Assessment Report* has been prepared by Barrett Mahony Consulting Engineers and is included under a separate cover. As detailed, the subject site is located within Flood Zone C and at a very low risk of flooding (i.e. outside the 1-in-100 year extent for fluvial and tidal flooding). Informed by this and the analysis in the report, it was concluded therein that: "*The surface water drainage system within the site is designed to cater for 1 in 100 year flows +30% climate change and 10% urban creep, without flooding. There is no discernible potential impact of the development on flooding in the vicinity of the site or downstream of it. Consideration has also been given to the proposed daylighting of the Camac culvert and it has been demonstrated that this does not pose a flood risk to the development or to adjacent developments.* *The surface water flow from the development will be limited to 2 l/s/ha and basement drainage will be pumped to avoid the risk of sewer backflows into the basement.* *We conclude that a further detailed flood risk assessment is not required*."
8 - To secure sustainable density, intensity at locations of high accessibility	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.	The subject site is located in a very sustainable location in terms of public transport options as the Bluebell Luas stop and a bus stop is located c.150 away from the site. With the high frequency of both the Red-Line Luas and the bus routes made available in proximity to the subject site, the future students occupying the accommodation will be able to access various facilities, services, amenities, and third level institutions.
	Look to optimise their development footprint; accommodating access,	The aim of the proposed development is to make use of an underutilised site to provide high-quality and higher-density

	servicing and parking in the most efficient ways possible integrated into the design.	accommodation for students. Due to the location of the subject site in relation to the surrounding intense regenerating context, the proposed density of the scheme is considered acceptable with a plot ratio of 3.2 proposed. An appropriate development footprint (site coverage) of 36% is proposed. This has been optimised, ensuring: it aligns with the *Development Plan* standards, the daylighting of the River Camac, the 10% public open space requirements is met (with 43% actually provided), the 5% cultural/community space requirement is met, the 5 sq m of amenity space per student bedspace requirement are included. Many surrounding developments that have been constructed or permitted are of heights similar to the proposed, or in fact, even higher.
9 - To protect historic environments from insensitive development	Not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments.	There is a Protected Structure across from the site -Naisetra House. As per the accompanying *Architectural Heritage Impact Assessment*, due to the distance to the proposal and the extensive screening within Naisetra House, there will be no material impact on the proposal. The existing evergreen planting provides a considerable level of screening between the subject site and the Naisetra House, and with the proposed buffer planting consisting of large native evergreen trees and a scrub and ground cover layer of vegetation along the Naas Road, any potential negative visual impacts cause by the proposed development will be mitigated. Another Protected Structure – Drimnagh Castle – is located c. 300 metres southeast of the subject site. The *Architectural Heritage Impact Assessment* concluded that due to the orientation of the buildings at Drimnagh Castle with no view toward the subject site, as well as the screening provided from the existing trees at the Drimnagh Castle site (even during winter when no leaves are on the trees), that there will be no impact on the character or setting

		of Drimnagh Castle as a result of the proposed development.
	Be accompanied by a detailed assessment to establish the sensitives of the existing environment and its capacity to absorb the extent of development proposed.	An *Ecological Impact Assessment* was prepared by Enviroguide Consulting. It ultimately concluded: "*It is considered that, provided the mitigation measures proposed within this report together with all best practice development standards as outlined in the Preliminary CMP are carried out in full, there will be no significant negative impact to any KER habitat, species group or biodiversity as a result of the Proposed Development. Additionally, the daylighting of a culverted section of the River Camac will create new habitats at the Site, including habitats suitable for amphibians and reptiles. The newly created habitats will also provide an enhancement in local resources for some of the identified KERs, such as birds and bats.*"
	Assess potential impacts on keys views and vistas related to the historic environment.	No key views or vistas are identified at or within the environs of the subject site. Notwithstanding this, a detailed *Townscape and Visual Impact Assessment* has been prepared by Modelworks to assess visual impacts more generally. It concluded that: "*Measuring the magnitude of change against the sensitivity of the receiving environment,* ***the significance of the townscape effects is predicted to be 'moderate'****, i.e. "an effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends" (EPA definition*" [Author's Emphasis]
10 - To ensure appropriate management and maintenance	Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.	The following reports have been prepared to guide the future maintenance and management of the proposed development: • *Operational Waste Management Plan* • *Construction Environmental Management Plan*

		• *Outline Delivery & Service Management Plan* • *Student Management Plan* • *Car & Cycle Parking Management Plan* • *Residential Travel Plan* • *Surface Water Management Plan* • *Landscape Design Report* Given the extent of detail included in each, the Council is respectfully directed to rear these individually for full details.

Table 8.5: The Proposed Development's Compliance with the Height Criteria Prescribed by Appendix 3 of the *Development Plan*

(Source: Appendix 3 of the *Dublin City Development Plan 2022-2028* and Thornton O'Connor Town Planning, 2023)

Therefore, it is firmly contended that there is strong merit in supporting the principle of part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 11 No. storeys (above basement level) for Block 2 as part of the redevelopment of the subject site with lower heights proposed to transition between neighbouring constructed / permitted buildings. The layout of the proposed development has comprehensively considered the position of the proposed blocks and open spaces has sought to provide a development that both adheres to local planning policy and exceed minimum policy requirements whilst also assimilating into its receiving environment. It is considered that the design response ensures that the development potential of a strategically positioned underutilised plot is maximised without impacting adversely on the amenity of adjacent properties and the surrounding area.

Having due regard for the policy and objectives set out in the *Dublin City Development Plan 2022-2028* and *Urban Development and Building Heights Guidelines for Planning Authorities*, the proposed height of the buildings is considered to be fully acceptable.

8.3.6 Design

The design of buildings, spaces and landscapes can make a positive contribution to the urban environment when a well-considered urban design and architecture approach is taken. Well-designed places can improve the environmental, economic and social value of an urban area. The following policies are of most relevance to the proposed development in terms of the overall design of the scheme:

Policy	It is the Policy of Dublin City Council:
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.
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.

The subject site is located within a built-up area in Dublin City, surrounded by ongoing intense regeneration. The proposed development seeks to construct a part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 11 No. storeys (above basement level) for Block 2 on a 0.962 ha underutilised plot of land to provide for 941 No. student bedspaces, 250 sq m of retail floorspace, 5,201 sq m of amenity space, 1,533 sq m of cultural and community space and 4162 sq m of public open space (both usable and visual). The Riparian Zone creates 1,261 sq m of open space (13% of the site area) on the subject site, providing visual amenity and biodiversity net gain. Due to the future protection of the flora and fauna created, the space is not included as useable public open space. The densification of the subject site responds positively to the surrounding context with many sites having been constructed or planning permission granted to redevelop similar industrial estate land. This includes the residential development to the south of the subject site, permitted under the parent permission DCC Reg. Ref. 4244/15. That application is only one of the many examples for intense regeneration on low-density and underutilised sites in the immediate area.

The design of the overall scheme was created to respond positively to the other approved developments in the surrounding area.

8.3.7 Cultural/Community Space

The *Development Plan* sets out a policy in respect of the provision of cultural/community space for development identified in SDRAs and / or development that are considered Large Scale Developments:

Objective / Policy	It is an Objective / the Policy of Dublin City Council:
CUO25	**SDRAs and Large Scale Developments** All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area* must provide at a **minimum for 5% community**, arts and **culture** spaces including exhibition, performance, and artist workspaces **predominantly internal floorspace** as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. *Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.
CU12	**Cultural Spaces and Facilities** To grow the range of cultural spaces and facilities in tandem with all new developments and across existing developments such as in **basement** or rooftop spaces where suitable to meet the needs of an increased population within the city.

CU14	**Cultural Uses in Developments on Former Industrial Lands** To ensure new developments on **former industrial lands incorporate cultural use**s (including night-time entertainment space designed to minimise impact on residential areas) as part of new mixed-use communities.

As the development is both in a SRDA (SDRA 5 – Naas Road), exceeds 10,000 sq m, and is located on industrial land, this policy applies. There is a total of 1,533 sq m of cultural and community space being provided in the proposed development, with 1,422 sq m of space located internally and 131 sq m externally.

The internal cultural and community space will be distributed amongst the basement and ground floor levels within Block 2. The basement will include 729 sq m of internal cultural space and 162 sq m of internal shared cultural and community space. The cultural space will principally comprise a digital hub and office with associated storage and staff ancillary facilities, while the shared cultural and community space will be used as an accessible break-out area.

The ground floor will include 472 sq m of internal community space and 59 sq m of internal shared cultural and community space. The community space will principally comprise a café and co-working area with associated storage and staff ancillary facilities, whilst the shared cultural and community space will act as the reception area for the facilities.

The external cultural and community space will also be provided at basement and ground floor levels within Block 2. At basement level, 91 sq m of shared cultural and community space is provided in the form of a balcony running along the side elevation, which will be used as accessible break-out space. The 40 sq m of community space at ground floor level is provided to the southeastern side of Block 2, which will be used as somewhere for people in the café to sit outside.

A lift and stairs will be available internally to provide access to the cultural/community space.

8.3.8 Public Open Space

Section 15.8.6 of the *Development Plan* sets out that residential developments on lands zoned as Z14 will be required to provide 10% of the overall site area as public open space. This requirement is also set out in the following policy in respect of the provision of public open space for development identified in SDRAs:

Policy	It is the Policy of Dublin City Council:
SDRA01	**Urban Greening and Biodiversity** Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, **a minimum of 10% public open space should be provided as part of all development proposals in SDRAs.** A financial contribution in lieu of same will only be considered in exceptional circumstances.

The proposed developed seeks to allocate a generous 30% of the total site area for usable public open space, well above the 10% requirement set out in the Development Plan with a

further 13% provided via the riparian zone. There will be 3,000 sq m of Public Open Space provided in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway (above the Riparian Zone). The Riparian Zone creates 1,261 sq m of open space (13% of the site area) on the subject site, providing visual amenity and biodiversity net gain. Due to the future protection of the flora and fauna created, the space is not included as useable public open space.

8.3.9 Commercial Floorspace

Policy	It is the Policy of Dublin City Council:
CEE2	**Positive Approach to the Economic Impact of Applications** To take a positive and proactive approach when considering the economic impact of major planning applications in order to support economic development, enterprise and employment growth and also to deliver high-quality outcomes.
CEE21	**Supply of Commercial Space and Redevelopment of Office Stock** (i) To promote and facilitate the supply of commercial space, where appropriate, including larger office floorplates suitable for indigenous and FDI HQ-type uses. (ii) To consolidate employment provision in the city by incentivising and facilitating the high-quality re-development of obsolete office stock in the city.

The proposed development will include 1 No. retail unit measuring 250 sq m in floor area. This space will be provided within the ground floor of the northern part of Block 2. This retail unit will provide jobs for people in the community and will lead to a growth in employment for the area. Students of the proposed accommodation, as well as local residents will be able to use the retail unit for everyday goods, further boosting the local economy.

The reception of the shared cultural and community space and the café proposed within the community space will provide jobs in the local area, while the other uses within the cultural and community spaces, such as the digital hub and co-working areas will bring people into the site and may be influenced to use the retail unit or café, further boosting the local economy.

The proposed quantum and type of public open space will increase footfall into the site and most notably create a permeable route for residents of the Carriglea site to the south to the Naas Road. The elevated walkway above the daylighted River Camac will provide an attractive and enjoyable space for members of the public. The level of footfall expected to visit and traverse the proposed development will increase local expenditure in the commercial units proposed as part of the surrounding approved developments such as the office unit, café / bar / restaurant units approved at the Royal Liver Assurance Retail Park site (ABP Ref.307804).

8.3.10 River Corridor, Green Infrastructure and Biodiversity

Objective / Policy	It is an Objective / the Policy of Dublin City Council:
SI7	**Water Quality Status** To promote and maintain the achievement of at least good status in all water bodies in the City.

SI11	**Managing Development Within and Adjacent to Camac River Corridor**[15] To manage all development within and adjacent to the Camac River Corridor in a way that enhances the ecological functioning and water quality of the river and aligns with the principles for river restoration. All development shall provide for a minimum set-back distance of 10-25m from the top of the river bank depending on site characteristics. Large development sites in excess of 0.5ha should provide a minimum set-back of 25m from the top of the river bank where informed by a hydromorphological study.
SI12	**River Restoration in Strategic Development and Regeneration Areas** To provide opportunities for enhanced river corridors in the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible: • SDRA 1 Clongriffin/ Belmayne and Environs • SDRA 3 Finglas Village Environs and Jamestown Lands • SDRA 4 Park West/Cherry Orchard • **SDRA 5 Naas Road** • SDRA 6 Docklands • SDRA 7 Heuston and Environs • SDRA 9 Emmet Road • SDRA 10 North East Inner City • SDRA 16 Oscar Traynor Road
SI07	**River Restoration Flagship Projects** To support the delivery of flagship river restoration projects where restoration measures can be comprehensively implemented, **including the Camac River Corridor**. This will include opportunities arising from the regeneration/ development of strategic land banks.
GI29	**Protect Character of River Corridors** To protect, maintain, and enhance the watercourses and their river corridors in the city and to ensure that development does not cover or encroach upon rivers and their banks. To maintain natural river banks and restore them as part of any new development. The creation and/or enhancement of river corridors will be required and river restoration opportunities where possible will be supported to help improve water quality, and ecology, provide natural flood relief as well as providing amenity and leisure benefits.
GI32	**Linear Parks and Recreational Use of Waterways Aspects** To develop linear parks, sustainable riverine access, walkways, cycleways and water focused recreational, sporting and tourism amenities which enhance appreciation of rivers in a manner that ensures that any adverse environmental effects are avoided and ecological enhancements, where appropriate, are employed to ensure a net biodiversity gain. Where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway.

[15] In respect of Policy SI 11 , please refer to the accompanying Hydromorphological Report prepared by AWN.

GI2	**Connectivity** To develop an interconnected green infrastructure network of strategic natural and semi-natural areas with other environmental features including green spaces, rivers, canals, the coastal and marine area and other physical features including streets and civic spaces that supports ecological, wildlife, and social connectivity.
GI3	**Multi-functionality (GI)** To ensure delivery of multifunctional green and civic spaces that meet community needs, support biodiversity, promote active and passive recreation, flood and surface water management and local habitat improvements. The multi-functionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.
GI4	**Accessibility** To ensure universal design for access for all to the green infrastructure network. Priority of access is to be given to pedestrians over all other users. In line with the Parks Strategy, access to facilities and to public parks and open spaces will be provided equally to all citizens and inequalities of access shall be identified and addressed.
GI6	**New Development / New Growth Areas** To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth areas in the city that contributes to the city's green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development.
GI40	**Tree Planting - General** To require appropriate and long-term tree and native hedgerow planting in the planning of new development, urban spaces, streets, roads and infrastructure projects. New development should seek to provide for additional tree planting using a diversity of species including native species as appropriate to the location of the development in the interests of natural heritage, amenity, environmental quality and climate resilience.
GI41	**Protect Existing Trees as Part of New Development** To protect existing trees as part of new development, particularly those that are of visual, biodiversity or amenity quality and significance. There will be a presumption in favour of retaining and safeguarding trees that make a valuable contribution to the environment.
GI16	**Habitat Creation and New Development** That new developments (as appropriate) will be required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.

In its current form, the subject site consists of a hardstanding surface only, with minor tree planting along the boundary of the site. The proposed development seeks to introduce green infrastructure, biodiversity gain and reintroduce the River Camac through the site. The River Camac is currently hidden underground through a culvert, where development to the south of the subject site, under DCC Reg. Reg 4244/15, was permitted to continue to culvert the River, with no requirement to daylight it. However, due to the hardstanding nature of the site, it is the aim of the development to open up the River Camac and allow for new greening and biodiversity.

As part of the subject development, it is proposed to reopen a section of the Camac culvert which runs through site from northwest to southeast. The existing culvert comprises a reinforced concrete pipe, approximately 5 metres in diameter, and located approximately 4.8 metres below the existing ground level (to the crown of the culvert). The existing culvert commences approximately 360 metres north of the development site near Bluebell cemetery, crossing below the Naas Road, and extends through the adjacent Carriglea Residential Development. The culvert terminates at the boundary of this development, where the Camac then reverts to an open watercourse as it turns north through Lansdowne Valley and towards Inchicore.

As part of this planning application, it is proposed to reopen approximately 76 No. metres of the culvert as it passes through the site (please refer to Barrett Mahony drawing GWH-BMD-ZZ-00-DR-C-1005 and Drawing No. 22-579-SDA-PD-DR-XX-202 prepared by Stephen Diamond Associates showing the extent of the proposed reopening). It is proposed the remove the circular roof and higher side walls of the culvert, but to maintain the lower structure to the base and sides of the watercourse. Figure 8.4 overleaf provides a section of the how the proposed daylighted river will look.

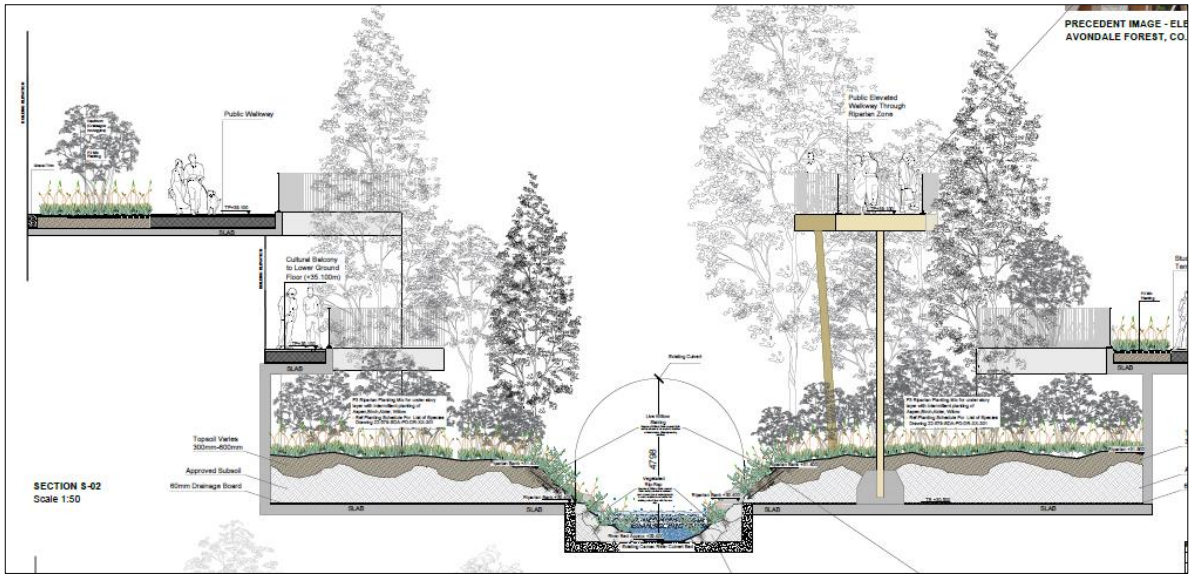

Figure 8.4: Section of Proposed Daylighted River

(Source: Drawing No. 22-579-SDA-PD-DR-XX-201 prepared by Stephen Diamond Associates)

The open spaces have been designed to the highest quality, ensuring that ecological and social connectivity is promoted. The aim of these open spaces is to promote active and passive surveillance and legibility for the area, which are accessible to all ages, demographics and abilities. Students with disabilities can access the external amenity space on basement

level through an internal lift in Block 1. The development will also contribute to the green infrastructure of the city by removing the existing hard standing site and providing high-quality landscaping within the redevelopment through green spaces and tree planting. The green infrastructure will allow for a biodiversity net gain as the site holds little to no biodiversity in its current nature.

8.4 Naas Road Local Area Plan 2013-2023 (Expired since January 2023)

The site was located within the Naas Road LAP, which expired in January 2023.

Figure 8.5 below shows the objectives prescribed for the site in the LAP which the Applicant has sought to broadly follow in the context of the linear park and river running through the site, the daylighting of the River Camac and the provision of non-residential uses at street level.

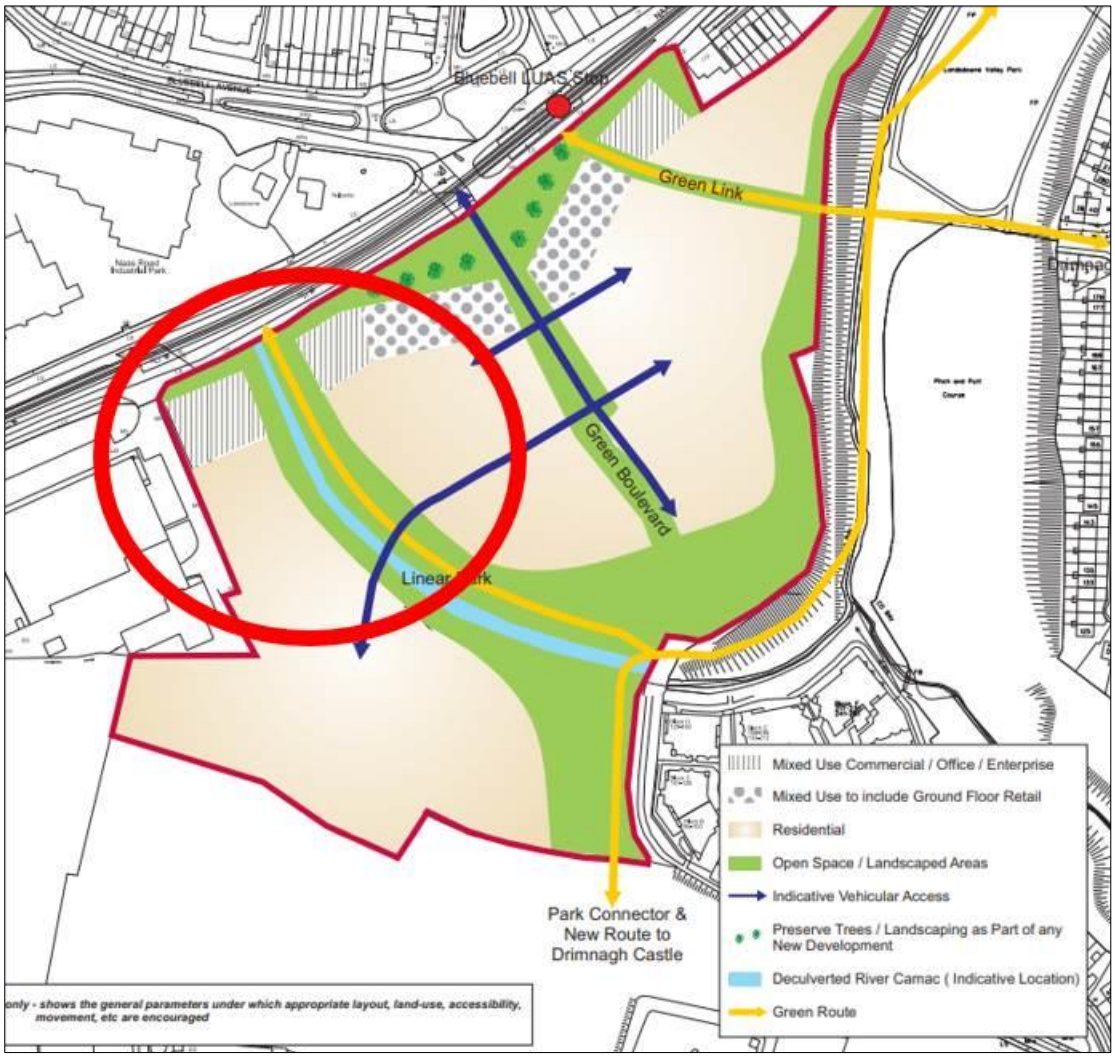

Figure 8.5: Site Specific Objectives from the Naas Road LAP

(Source: Naas Road LAP 2013-2023)

8.4 Response to Other Relevant Policies / Objectives of the *Development Plan*

Chapter No.	Section	Policy/ Objective Number	Policy / Objective	Comment
Chapter 2 – Core Strategy	2.7.1			
		CSO5	*Programme for the Preparation of Local Environmental Improvement Plans* To implement a programme for the preparation of Local Environmental Improvement Plans and to prioritise areas in accordance with the strategic objectives of the core strategy.	The Applicant is happy to liaise with Dublin City Council in relation to any future preparation of a Local Environmental Improvement Plan where relevant.
		CSO14	*Co-ordinated Approach to Future Development of Strategic Growth Areas* To facilitate a co-ordinated approach to the future development of strategic growth areas including the Naas Road area (City Edge Project), lands at Dunsink and the Belmayne-Clongriffin area, with South Dublin County Council, Fingal County Council respectively and relevant stakeholders.	The application has considered and responded to policies in the City Edge Strategic Framework as detailed in planning documents.
Chapter 3 – Climate Action	3.5	CA2	*Mitigation and Adaptation* To prioritise and implement measures to address climate change by way of both effective mitigation and adaptation responses in accordance with available guidance and best practice.	Please refer to the Climate Action Energy and Sustainability Statement prepared by Delap & Waller.
	3.5.1	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 subject scheme proposes the regeneration of underutilised core urban brownfield lands beside high quality public transport in a high-density sustainable manner.

			the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019.	
		CA4	*Improving Mobility Links in Existing Areas* To support retrofitting of existing built-up areas with measures which will contribute to their meeting the objective of a low-carbon city, such as reopening closed walking and cycling links or providing new links between existing areas.	The proposed Application provide a green link to the Carriglea scheme to the rear contributing to the provision of a green link along the Camac River, which the application also proposes to daylight within its site.
		CA5	*Climate Mitigation and Adaptation in Strategic Growth Areas* To ensure that all new development including in Strategic Development and Regeneration Areas integrate appropriate climate mitigation and adaptation measures. See also Section 15.4.3. Sustainability and Climate Action and Section 15.7.3 Climate Action and Energy Statement.	The proposed development has been designed in line with energy hierarchy, providing a thermally efficient fabric specification and thermal comfort strategy which has been assessed not only using current climate conditions, but also against future climate conditions for low, medium and high emission scenarios. The energy strategy is an all-electric solution, through highly efficient heat pump systems, which is district heating enabled. This is in line with the current statutory NZEB requirements and aligns with future Net Zero Carbon requirements. The *Climate Action, Energy & Sustainability Statement* prepared by Delap & Waller details this further.
		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 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;	A *Climate Action, Energy & Sustainability Report* prepared by Delap and Waller is enclosed separately which comprehensively considered these items. The Report details the strategy to address the various Climate Mitigation Actions in the Built Environment. The proposed development has been designed in line with the principles of the energy hierarchy, Be Lean, Be Clean & Be Green. This ensures the development prioritises passive measures which reduces carbon, balances high quality daylight while ensuring thermal comfort is maintained year-round via mixed mode ventilation and passive fabric specification. A feasibility study

			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 CO_2 emissions; and h. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.	has been carried out to determine the most appropriate LZC/renewable energy system for the scheme, in line with NZEB and future Net Zero Carbon requirements. Construction materials used will be sourced from manufacturers with EPBD certification, encouraging the use of materials with high percentage of recycled content. The development aims to achieve the recommended Whole Life Cycle Carbon levels outlined in RIBA. A desktop review has been carried out to assess the feasibility of connecting to an existing or future heat network in accordance with the heating hierarchy. The report lists out the existing or proposed SDRAs which have proposed district heating networks along with their proximity to the development. The desktop study has outlined that there are no existing or currently proposed district heating networks within the vicinity of the subject site, with the closest future proposed network being within SDRA 14 St James' Healthcare Campus located 3.14 km from the proposed development. Therefore, in accordance with the DCC document "*Dublin District Heating System Technical Information Pack for Developers*" the proposed energy strategy for Gowan house will be a decentralised energy strategy, compliant with Nearly Zero Energy Building standards, and be district heat enabled. In addition, the scheme will receive adequate daylight as demonstrated in the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau submitted herewith. The location of the subject site benefits from the close proximity of the Bluebell Luas stop serving the Red Line route as well as various bus stops in the vicinity. As the proposed development seeks to reduce private car use by only providing 7 No. Car parking spaces on site, students, staff and visitors will be encouraged to use the various public transport options

				available instead, thus reducing carbon dioxide emissions associated with private car usage.
		CA9	*Climate Adaptation Actions in the Built Environment* Development proposals must demonstrate sustainable, climate adaptation, circular design principles for new buildings / services / site. The council will promote and support development which is resilient to climate change. This would include: a. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect; b. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings; c. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS); d. reducing flood risk, damage to property from extreme events– residential, public and commercial; e. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply; f. promoting, developing and protecting biodiversity, novel urban ecosystems and green infrastructure.	The proposed development has been designed to achieve thermal comfort in accordance with the industry standard CIBSE Technical Memorandum 59 (2017). Compliance has been achieved through; reduced glazing solar transmission to control excessive solar gains, high thermal mass capacity of the structure, openable windows for purge ventilation and mechanical ventilation to provide continuous background ventilation. This analysis will be continually assessed at each design stage, to ensure compliance is achieved. The scheme also includes green roofs, SuDS measures and opportunities for biodiversity and green infrastructure enhancement through amongst other things, the daylighting of the River Camac and thus has demonstrated that the scheme will be a sustainable climate friendly development. Altogether there are 8 No. extensive rooftops across Block 1 & 2 covered with sedum-type planting and 2 No. Further intensively planted roofs at ninth and tenth floor level. The intensively planted roofs are planted with a native-approved meadow mix which is filled with species of plants that will attract various pollinators. Several felled logs are proposed to be placed within the planted roofs at nineth and tenth floor level which will gradually decompose over time and provide a habitat to tiny insects. Where possible existing topsoil and subsoil on site are to be retained and utilised within the site. A water reservoir and drainage board is specified where planting is proposed over slabs on the ground floor and on roofs to harvest rainwater. By

				providing large softscape areas, the heat island effect is mitigated. Amorphous-shaped planters have been incorporated into the design of the scheme to reduce the number of paved areas throughout the scheme to minimise pollution. Permeable paving is also proposed for certain areas of the site to further mitigate pollution. Some 13% of the overall site area is dedicated to the riparian zone, designed as a biodiversity hub from which nature spills outwards into the surrounding urban setting. This area is protected and only access for maintenance purposes is allowed. The riparian zone aims to restore the river corridor ecosystem lost during the urbanisation of this area and create conditions for new habitats to establish along the river.
		CA10	*Climate Action Energy Statements* 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.	A NEAP assessment has been carried out at this application stage to demonstrate the commercial and student accommodation complies with TGD Part L (NZEB), using the proposed fabric and energy strategy. This is detailed in the *Climate Action, Energy & Sustainability Statement* prepared by Delap & Waller and enclosed separately, with the BRIRL output report found in Appendix A to the Report.
	3.5.3	CA11	*Energy from Renewable Sources* To support, encourage and facilitate the production of energy from renewable sources, such as from solar energy, hydro energy, wave/tidal energy, geothermal, wind energy, combined heat and power (CHP), heat energy distribution such as district heating/cooling	When considering Be Clean and Be Green measures for the proposed development, a feasibility study was carried out to determine the most feasible and effective Low and Zero carbon Technologies (LZC) and renewable energy sources for the proposed development. This is detailed in Section 4.4 of

			systems, and any other renewable energy sources, subject to normal planning and environmental considerations.	the *Climate Action, Energy & Sustainability Statement* prepared by Delap & Waller enclosed separately.
		CA15	*Waste Heat, District Heating and Decentralised Energy* To actively encourage the development of low carbon and highly efficient district heating and decentralised energy systems across the city utilising low carbon heat sources such as renewable energy and waste heat recovery and to promote the connection of new developments to district heating networks where such systems exist/can be developed in a given area.	A *Climate Action, Energy & Sustainability Report* prepared by Delap & Waller is enclosed separately. Due to local constraints as detailed, district heating was not considered a viable option. See below.
		CA17	*Supporting the Potential of District Heating in Dublin City* To support, encourage and facilitate the potential of district heating in Dublin City, all Climate Action Energy Statements submitted to the Council (see Policy CA10) shall include an assessment of the technical, environmental and economic feasibility of district or block heating or cooling, particularly where it is based entirely, or partially on energy from renewable and waste heat sources. In addition: • Climate Action Energy Statements for significant new residential and commercial developments in Strategic Development and Regeneration Areas (SDRAs), will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to an available or developing district heating network in the area. • Climate Action Energy Statements for significant new residential and commercial developments in the Docklands SDRA will assess the feasibility of making the development 'district heating enabled'	A desktop review has been carried out to assess the feasibility of connecting to an existing or future heat network in accordance with the heating hierarchy. The *Climate Action, Energy & Sustainability Statement* lists out the existing or proposed SDRAs which have proposed district heating networks along with their proximity to the development. The proposed development falls under SDRA 5, where there is no existing or currently proposed infrastructure for district heating networks. The desktop study has outlined that there are no existing or currently proposed district heating networks within the vicinity of the subject site, with the closest future proposed network being within SDRA 14 St James' Healthcare Campus located 3.14km from the proposed development. Therefore, in accordance with the DCC document "*Dublin District Heating System Technical Information Pack for Developers*" the proposed energy strategy for Gowan House will be a decentralised energy strategy, compliant with Nearly Zero Energy Building standards, and be district heat enabled. This will ensure that the development complies with Part L 2022, nZEB, and DCC's Climate Action Policies upon completion. In the future, should a district heating network be

			in order to facilitate a connection to the Dublin District Heating System.	proposed within a feasible proximity to the subject site, then the building can connect to this system.
		CA18	*Capture and Utilisation of Waste Heat* To encourage proposed and existing developments and facilities (such as data centres) to capture and utilise otherwise wasted heat, and use waste heat either on-site, or in an adjoining, and nearby sites, in compliance with all relevant Energy Efficiency Regulations.	As per CA17, the desktop study outlined that there are no existing or currently proposed district heating or waste heat recovery networks in the vicinity of the subject site. The development therefore will have a decentralised energy strategy, which has the ability to connect to future networks.
	3.5.4	CA23	*The Circular Economy* To support the shift towards the circular economy approach as set out in a Waste Action Plan for a Circular Economy 2020 to 2025, Ireland's National Waste Policy, as updated together with The Whole of Government Circular Economy Strategy 2022- 2023. https://www.gov.ie/en/publication/b542d-whole-of-government-circular-economy-strategy-2022-2023-living-more-using-less/	As part of this application, AWN and the Design Team have designed and prepared a Resource & Waste Management Plan in line with the requirements of the Environmental Protection Agency (EPA) of Ireland issued '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects' in November 2021* and an Operational Waste Management Plan in line with best practice guidance and National, Regional and Local legislation and guidance which includes supporting the government circular economy strategy and the new draft National Waste Management Plan for a Circular Economy (NWMPCE) (2023).
		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 Resource & Waste Management Plan in line with the requirements of the Environmental Protection Agency (EPA) of Ireland issued '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects'* in November 2021 has been prepared and submitted with this application.
	3.5.5	CA25	*Electric Vehicles* To ensure that sufficient charging points and rapid charging infrastructure are provided on existing	For the proposed development, 5 No. of the 7 No. spaces provided (or 71%) will be equipped with charging stations, and the other two will have provision for future stations.

			streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation.	
	3.5.6	CA26	*Flood and Water Resource Resilience* To support, encourage and facilitate the delivery of soft, green and grey adaptation measures to enhance flood and water resource resilience in the city and support the delivery of grey adaptation measures to enhance flood and water resource resilience where necessary.	The proposed development involves the daylighting of the existing Camac culvert, along with the provision of a riparian corridor to either side of the open river channel. The riparian corridor zone has been designed to act as a flood plain, which should naturally improve the flood performance of the river.
		CA28	*Natural Flood Risk Mitigation* To encourage the use natural flood risk mitigation or nature based solutions including integrated wetlands, green infrastructure, and Sustainable Drainage Systems (SuDS) as part of wider adaptation and mitigation responses to achieve flood resilience.	The proposed development proposes to use a variety of green infrastructure and SuDS measures to act as natural flood risk mitigation measures. The provision of intensive and extensive green and blue roofs will provide a significant volume of water storage on the roofs of the development, while also slowing the rate at which water will discharge to the main drainage system. Similarly, the provision of swale or bioretention type areas at ground level will provide some natural areas for flood water retention. The provision of the riparian corridor along the sides of the daylighted Camac culvert will also improve the flood resilience of the proposed development.
	3.5.7	CA29	*Climate Action and Green Infrastructure* To protect, connect and expand the city's Green Infrastructure while optimising the climate change adaptation and mitigation services it provides.	The scheme will contribute to the green infrastructure of the city by providing open spaces, green roofs and landscaping. The scheme also proposes the daylighting of the River Camac which is currently culverted.
Chapter 4: Shape & Structure of City	4.5.1	SC4	*Recreational and Cultural Events* To promote and support a variety of recreational and cultural events in the city's civic spaces; as well as the	The proposed development seeks to provide a total of 1,533 sq m of cultural and community space, divided between internal and external space. The local community and members of the public will be able to use these spaces. It is considered

			development of new and the retention and enhancement of existing civic and cultural spaces.	appropriate to identify an end-use post-planning and once construction has commenced and an operational date is known a user identified today many have found space elsewhere in the c. 3-4 years between now and completion, i.e. securing planning and constructing the development. The majority of cultural and community space will be located internally, providing 1,422 sq m across the basement and ground floor level, equating to 92% of the total cultural and community space proposed. The remaining 8% will also be provided externally at basement and ground floor level, making up 131 sq m of cultural and community space. Internally, there will be 729 sq m of cultural space and 162 sq m of shared cultural and community space provided at basement level, while there will be 472 sq m of community space and 59 sq m of shared cultural and community space at ground floor level. Externally, there will be 91 sq m of shared cultural and community space provided at basement level, and 40 sq m of community space at ground floor level.
	4.5.3	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.	The proposed development represents an appropriate density and plot ratio for the area, which is a key regeneration are beside the highest quality public transport. Please see the Architectural Design Statement and this Planning Report for details. There are 10 No. high-level aims set out in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Area (2009)* and the *Urban Design Manual: A Best Practice Guide* sets out 12 No. key indicators for developments in urban areas. Section 6.9 of this Report provides an analysis of how the proposed development is consistent with these high-level aims and key indicators.

		SC11	*Compact Growth* In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities 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.	The proposed development epitomises compact growth through the provision of a sustainable higher density development on an underutilised site adjacent to public transport links of Luas and bus, social and community infrastructure with the development also providing services for the surrounding community. The proposed development also includes a generous provision of both public open space and student amenity space. A variation of outdoor amenity space has been incorporated into the scheme through the design of 2 No. Plazas (Central Plaza and the Connection Plaza), a riparian zone, a student amenity terrace and roof garden, a shared cultural and community balcony looking out over the riparian zone, and a network of 'through-routes' for cyclists and pedestrians.
		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.	The proposed development introduces Student Accommodation into the Naas Road/City Edge lands, providing a tenure diversity and mix, with the students bringing a different population cohort into the area, who can work in and utilise the commercial facilities provided in the subject application and the commercial/retail facilities in the surrounding granted permissions. We note that the City Edge Strategic Framework (CESF) makes specific reference to Student Accommodation stating

				that it *'will have a role to play in providing a mix of housing types'.* The CESF states the following: *'In line with guidance on Student Accommodation, purpose-built student accommodation should be provided on campuses or in suitable locations which have convenient access to third level colleges, especially by foot, bicycle and high quality and convenient public transport'.* As detailed extensively throughout this application, the subject site is located within 150 metres of the Luas allowing easy access to third level colleges from the City Edge lands and specifically the subject site. The CESF further states the following in respect of the City Edge Lands: *'Proximity to third level institutions can provide a highly educated workforce, particularly to support new / emerging future sectors'.* (Page 84) *'As mentioned, City Edge has relative proximity to number of third level institutions, such as those in Dublin city centre, providing a graduate workforce to support new and emerging sectors, in particular'.* (Page 87) It is our Opinion that the CESF recognise the proximity of 3rd level institutions to the City Edge lands and the CESF details the most proximate facilities on Page 3.4.3 (see Planning Report for further information).

				Page 268 of the CESF proceeds to state the following: • *City Edge population generally falls below both State and wider Dublin City in terms of educational attainment (for e.g. at Upper Secondary and Third Levels). Provision of a greater range of employment opportunities in the area can help open up awareness of career opportunities and stimulate improved education achievement.* • *The presence of new education facilities can also increase engagement in education at both school and post-school ages.* Similar to the presence of education facilities, the introduction of Student Accommodation into the area can have the same effect of encouraging greater participation in 3rd level education through the effect of the visibility of students living and working in the immediate area.
		SC13	*Green Infrastructure* To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.	There is high quality hard and soft landscaping and green roofs proposed for the development. A new linear open space connects the site to the Carriglea site to the rear. The proposal also daylights the culverted River Camac through the site providing very significant biodiversity improvements to the site.
	4.5.4	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.	There is a building height strategy for the buildings and massing to integrate with the existing and proposed context and urban form. Please see the Architectural Design Statement for details. The *Development Plan* identifies a series of areas within which additional height would be supported, with 'Public Transport Corridors' considered to be applicable to the subject site.

				Accordingly, the *Development Plan* prescribes a series 10 No. objectives and associated criteria in Table 3 of Appendix 3 which development of increased height exceeding the prevailing context must meet. Although the Height Guidelines specify a series of criteria which taller structures need to meet to allow the Council to Grant Planning Permission under SPPR3, these have not been directly responded to here (even though the proposed development complies with them), as they apply to developments proposed in instances where the height would be contrary to the specific objectives of a statutory plan (i.e. where blanket heights are applied). The Council is referred to Section 8.3.5.2 of this Report and Table 2 of the *Townscape and Visual Impact Assessment* for the responses / compliance statements in relation to Table 3 of Appendix 3 below for a full assessment of the proposed development's height.
		SC15	*Building Height Uses* To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.	There is a mix of uses within the proposed development including residential (student accommodation), commercial (a retail unit) and community/cultural uses proposed for the site. Please see the Architectural Design Statement for further details.
		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	The subject site is located in SDRA 5 – the Naas Road SDRA. As such, in this strategic regeneration area, it is considered suitable for additional height with heights of up to 18 No. storeys granted in proximity. The area is undergoing transition from industrial lands to a mixed-use, residential-led new urban neighbourhood supported by the recently expired Naas Road LAP and the City Edge Strategic Framework.

			with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.	Please see Section 8.3.5.2 of this Report for the responses / compliance statement in relation to Table 3 of Appendix 3 of the *Development Plan.*
		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 (in accordance with the criteria for assessment set out in Appendix 3); • 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.	Please see Section 8.3.5.2 of the Planning Report and Statement of Consistency and the *Townscape and Visual Impact Assessment* (TVIA) prepared by Modelworks which demonstrates how the proposed development accords with Table 3 of Appendix 3 of the *Development Plan.* It is of note that in granting permission for the adjoining Concorde Development (ABP Ref: 312218-21), the Board stated the following in their Order: *"It is considered that permission for the proposed development should be granted having regard to recent neighbouring permissions in the area, including the pattern of residential density and building heights granted permission under Dublin City Council Register Reference Number 3228/20 (Nissan Site) and An Bord Pleanala References Numbers ABP-311606-21 (Carriglea Industrial estate site) and ABP 307804-20 (Royal Liver Insurance Retail Park). The proposed development is to an extent, continuing on the pattern of development granted in those permissions."* In summary, the permitted maximum heights in these schemes were as follows: Carriglea – 8 No. Storeys Concorde – 10 No. storeys Nissan Site – 15 No. storeys Royal Liver Site – 18 No. storeys

				It is thus clear that the proposed development's height of part 9 to part 15 No. storeys continues '*the pattern of development granted in those permissions'*, noting that Student Accommodation has a lesser floor to ceiling height than standard apartments. As strongly demonstrated in the quote above from An Bord Pleanála, in assessing the adjoining Concorde scheme the proposed heights are clearly in line with prevailing heights along the Naas Road. The proposed height, as stated in the *TVIA,* is predicted to produce a 'moderate' townscape effect, in that the character of the surrounding environment is altered but in a manner that is consistent with existing and emerging baseline trends. The site is located next to a public transport hub and the busy Naas Road that serves as the core pedestrian spine. The tallest part of the building has been reduced in mass to achieve a more desirable slenderness. The proposal appropriately varies in scale to ensure it fits well with its context, ensuring it is not monolithic and offering an interesting design that will enhance the skyline.
	4.5.5	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.	The proposal aims to provide high-quality student accommodation by a sustainable design approach and use of high-quality materials. Daylighting of River Camac and provision of multiple green roofs contribute positively to the natural environment. The introduction of chamfers to the building façade allows the maximisation of daylight and ensures high quality internal environment.

				The buildings are proposed to be constructed with pre-fabricated concrete panels. This will reduce the environmental impact and speed up the construction process. Careful consideration has also been given to the location of uses on the ground floor, in order to maximise active frontage throughout the site to create a vibrant and active public realm.
		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).	The proposed development follows the principles set out in the Urban Design Manual and the Masterplan & *Architectural Design Statement responds* to all the criteria. Section 6.9 of this Report also provides a response to all relevant criteria of the Urban Design Manual. In addition, Barrett Mahony Consulting Engineers have prepared a *DMURS Compliance Report* which is enclosed separately.
		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.	The scheme is one of the first proposals to address the daylighting of the culverted River Camac within the City Edge Strategic Framework lands. The river runs diagonally through the site, presenting a significant challenge in terms of the remaining developable land versus the demands of opening up the River Camac. In order to address policy aspirations, several innovative design measures were adopted. The design team maximised the amount of riparian zone being formed near river level, and in places the façade/glazing is to be located in line with the retaining structure, such as the cultural and community use at basement level. This allows users of the cultural space to effectively directly overlook and experience the river and riparian zone. Generally, the daylighting of the River Camac is being treated as a favourable outlook and positive visual amenity to the development.

				The daylighting of the River Camac offers an interesting experience to the public: an elevated walkway at ground level. This is achieved with a walkway that meanders above the riparian zone, allowing the public to observe and experience this space without disturbing any wildlife that might be found there. The walkway links the Central Plaza to the north of the site with the Carriglea development to the south. This is in addition to a more direct public route through the site between the western part of the riparian zone and the eastern elevation of Block 2. As a student, there is a further experience of the river to be had. This is across the student link bridge that connects block 1 to block 2. Although this bridge is there for operational purposes, it does offer an elevated view directly above the River Camac. Note that the daylighting of the river improves the hydromorphological condition of the river. Refer to the *Hydromorphological Qualitative Technical Assessment* (HQTA) prepared by AWN Consulting. In terms of construction innovation, the proposals currently cater for a modern method of construction which uses precast modular elements to form the majority the scheme. This generates a particular architectural language. Particular functions are legible through the colouring of building elements, such as student living/kitchen rooms are a particular colour, or lower levels facing onto the public realm are another colour. Variety is further added to the facades dressing the student rooms by modulating the façade in places and altering the colour tone of materials. Some if the key benefits of this

				method of construction are that there is much less waste, as the precast components are produced in factory conditions, and the construction programme is typically slightly reduced, creating less disruption to neighbouring sites. The energy strategy has been designed with passive design at its core, which ensures the proposed development is thermally efficient, decarbonised, adaptable and resilient for future climate conditions. Details can be found within the *Climate Action, Energy & Sustainability Statement* prepared by Delap & Waller enclosed separately.
		SC22	Historical Architectural Character To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures.	A report has been prepared by Historic Building Consultants assessing the scheme in the context of the context's historical architectural character, namely Naisetra House and Drimnagh Castle.
		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.	This application includes an Architectural Design Statement prepared by HKR Architects, which is enclosed separately.
Chapter 5 - Quality Housing and Sustainable Neighbourhoods	5.5.1	QHSN3	Housing Strategy and HNDA (i) To secure the implementation of the Dublin City Council Housing Strategy (Appendix 1) in accordance with the provision of national legislation. (ii) To encourage the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the city in accordance with the provisions of the Housing Need Demand Assessment and any future Regional HNDA.	The subject supplication seeks to create a sustainable residential community by introducing a different housing typology to the area, one not currently provided in the area. Please refer to the response to Policy SC12 above.

	5.5.2	QHSN4	*Key Regeneration Areas* To promote the transformation of the key regeneration areas into successful socially integrated neighbourhoods and promote area regeneration in parts of the city which require physical improvement and enhancement in terms of quality of life, housing and employment opportunities and to ensure a balanced community is provided in regeneration areas.	The subject site forms part of the recently expired Naas Road LAP lands and the current Naas Road SDRA, which will contribute to the transformation of this area which is already underway. The introduction of an alternative housing option will provide a diverse population cohort into the Naas Road regeneration area, providing a different housing typology to the quantum of apartment developments granted in the area. By broadening the demographic and socio-economic profile of the area, it will introduce vibrancy and vitality to the area. It will provide workers for the shops, café and gyms that will all form part of the transformed Naas Road area and will provide jobs for the students beside their accommodation to help fund their college experience.
		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 of appropriate density for the area having regard to the underutilised nature of the site in a prime serviced location in an area designated for sustainable regeneration with 150 metres of a Luas stop.
	5.5.3	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,	The proposed development embraces the principles of the 15-minute city with a mix of uses, reduced quantum of parking, healthy placemaking and density. It also introduces an intergenerational population into the area, a key aspect of avoiding a homogenous area. As referenced on Page 127 of the CESF:

			amenities, sports facilities and sustainable modes of public and accessible transport where feasible.	*"As set out in the previous sections of the Movement Framework, City Edge has adopted a transit orientated approach which will provide all future residents with efficient access to high capacity public transport as well as access to essential daily services within a 15 minute walk or cycle."*
		QHSN12	*Neighbourhood Development* To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which: • build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places; • integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city; • encourage sustainable and low carbon transport modes through the promotion of alternative modes and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance; • promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model. • promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance;	The subject scheme addresses this policy as follows: • the scheme will build on the emerging local character by becoming part of the regenerated Naas Road lands. The daylighting of the river and associated landscape treatment will identify the unique character of this site. • The scheme will provide community and cultural space for the wider community. • Whilst the students will use public transport or cycle to their university, the proposal will contribute to a more walkable immediate environment providing a green and blue link through the site along the River Camac. Along with the subject site, the neighbouring sites which are largely all scheduled for redevelopment will provide social and commercial facilities ensuring a walkable community. • The scheme requires and thus provides limited car-parking spaces, principally supporting the sustainable use of public transport and cycling as would be typical in Student Accommodation schemes. • The scheme promotes sustainable design through energy efficiency as detailed by Delap and Waller. • The scheme significantly improves the public realm and the environment by daylighting the river, improving the biodiversity of the site and thus the area. • The scheme proposes an alternative accommodation choice to the predominance of apartments proposed in granted schemes in the area which broadens the

			• promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects; • cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion; • provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life; • have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the Regional Spatial and Economic Strategy and national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'; • are designed to promote safety and security and avoid anti-social behaviour.	demographic profile and socio-economic profile of the community. See response to Policy SC12. • As detailed in the Community Safety Strategy in the *Design Statement* by HKR Architects, the scheme has been designed to protect all users by providing a high level of passive surveillance of all open spaces sitewide.
	5.5.4	QHSN14	*High Quality Living Environment* To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs.	The proposed development provides a high-quality living environment by providing high quality internal and external accommodation. The provision of much needed student accommodation bedspaces will afford students the opportunity to find accommodation at a time of extreme shortages of all kinds of accommodation. Please refer to the responses to Policy SC19 & SC21 for further details.
		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	All 47 No. accessible studios are fully wheelchair accessible and are located near circulation cores for ease of access. There is sufficient space for disabled users in all circulation spaces, communal areas, bin stores, and public space. See Page 46 in

			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.	the *Architectural Design Statement* prepared by HKR Architects regarding accessibility. Hard and soft landscape and streetscape elements will be fully detailed and completed to the required level to meet current building regulations and best practice provided by the relevant guidance documentation e.g. Technical Guidance Document Part M – Access and Use Building Regulations (2022) and 'Building for Everyone: A Universal Design Approach' by the National Disability Authority. All Public walkways are a minimum of 1.8m wide to allow sufficient space for wheelchair users and prams to pass each other. A minimum of 1.5m width is provided in student external communal areas with 1.8 minimum landings. All areas are level with a slope of a maximum 1:50/ 1:40 for (drainage if necessary) on the roof gardens, within the Ground Floor and Basement Level spaces. Tactile paving has been provided in line with DMURS at thresholds to sharded surfaces to warn visually impaired people of potential vehicular traffic. Drop kerbs with tactile blister paving are also provided in areas such as pedestrian crossings and accessible parking spaces.
		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 subject scheme will contribute to a sustainable neighbourhood that caters to a specific population cohort- students, a cohort not currently catered for. Thus, the subject scheme will contribute to a sustainable neighbourhood.
		QHSN19	Youth Friendly City	The proposed Student Accommodation is specifically proposed to cater for young people in the Naas Road SDRA, a

			To promote and support a youth friendly city including the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure. To promote a built environment in the inner city, developing areas and Strategic Development Regeneration Areas which support the physical and emotional well-being of children and young people. To promote policies and objectives that have regard to the Children and Young People's Plans prepared by the Dublin City North and Dublin City South Children and Young People's Services Committees and any future DCC Youth Friendly City Strategy including any future youth homeless strategy.	cohort not currently explicitly catered for in the area thus fully according with the policy. The provision of much needed Student Accommodation will support the physical and emotional wellbeing of the students. Students have clearly indicated the stresses and challenges of not being able to find suitable accommodation to live in whether that is a room in a house or PBSA. The proposed PBSA will provide an opportunity for student accommodation which can be offered at a cheaper rate due to the fact that it is not directly in the City Centre and thus land values are cheaper. Physically, the scheme proposes a number of options for activities in the communal and public open space.
		QHSN21	Gated Residential Development It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.	The scheme will be open to the public through the external spaces from the Naas Road through to the Carriglea development behind, along the line of the newly daylit river. The scheme also provides community and cultural facilities as well as a retail unit for the wider community. As with all student accommodation, their spaces will be private and not accessible to the public.
		QHSN25	*Housing for People with Disabilities* To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which facilitates equality of outcome, individual choice and independent living. To support the provision of specific purpose-built accommodation, including assisted/supported living	The proposed development provides 47 No. accessible studios, ensuring suitable accessible accommodation for all.

			units, lifetime housing, and adaptation of existing properties.	
		QHSN27	*Homeless Action Plan 2022-2024, a Framework for Dublin* To support the implementation of the Homeless Action Plan 2022-2024, a Framework for Dublin or any subsequent review and the Housing First National Implementation Plan 2022-2026 and support related initiatives to address homelessness.	In a research paper entitled '*Geographies of purpose built student accommodation: Exclusivity, precarity and (im)mobility'*, dated August 2020, the following is noted: '*A statement from the Union of Students in Ireland states: "On the night of the census in 2016, there were 429 students homeless in Ireland – making up 8% of the total homeless numbers. There are students effectively being locked out of college because they cannot find or afford suitable accommodation whilst they study" (USI, in O'Kelly, 2018)*'. One can likely reasonable assume that these numbers have increased since this research paper was published given the general significant increase in homelessness across society. The proposed development can contribute to increasing the supply of Student Accommodation in a suitable location close to 3rd level facilities and public transport. Link to article: Geographies of purpose built student accommodation: Exclusivity, precarity and (im)mobility - Reynolds - 2020 - Geography Compass - Wiley Online Library https://compass.onlinelibrary.wiley.com/doi/10.1111/gec3.12543
		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	There is no Student Accommodation in the immediate vicinity of the subject site and thus there will be no over proliferation.

			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 accommodation development to be converted to any other use during term time.	Policy QHSN45 specifically supports the provision of Student Accommodation in appropriate locations *'adjacent to high-quality public transport corridors and cycle routes'*. The provision of Student Accommodation is also supported in the CESF, a joint framework between Dublin City Council and South Dublin County Council. Whilst not directly adjacent to 3rd level campuses, the location provides easy access to the City Centre or out to Tallaght UD for example. The scheme complies with the Guidelines for Student Accommodation outlined in the Dublin City Development Plan.
	5.5.8	QHSN47	*High Quality Neighbourhood and Community Facilities* To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.	Community and cultural space is proposed as part of the development
		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	A *Community and Social Infrastructure Audit* has been prepared by Thornton O'Connor Town Planning, which assesses the provision of community facilities and infrastructure in the vicinity. The site is well served by community facilities and infrastructure and the provision of designated community/cultural space in line with the Development Plan,

			additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.	will further enhance the available of social infrastructure in the area.
		QHSN49	*Phasing* To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.	Given the nature of the development, it will be developed in a singular phase.
		QHSN51	*Amenities and Retail* To ensure all areas of the city, including those that have Local Area Plans, deliver social infrastructure, sports and recreational facilities, retail outlets, schools and infrastructure in accordance to an agreed phasing programme to ensure large neighbourhoods are not left isolated without essential services.	Most if not all of the schemes within the Naas Road LAP lands have provided commercial facilities along with residential. The subject scheme proposes cultural, community and retail floorspace, which will contribute to the transforming lands.
		QHSNO14	*Community Infrastructure Audit SDRAs* To carry out and maintain an audit of community infrastructure for Strategic Development and Regeneration Areas, where appropriate.	A *Cultural and Community Infrastructure Assessment* has been prepared by Turley whilst a *Community and Social Infrastructure Audit* has been prepared by Thornton O'Connor Town Planning.
		QHSNO15	*Community Safety Strategy* That all housing developments over 100 units shall include a community safety strategy for implementation.	A *Community Safety Strategy* has been prepared by HKR Architects and is enclosed as part of the Architectural Design Statement.
		QHSN58	*Culture in Regeneration* To recognise culture as an important mechanism in regeneration, with the potential to act as a catalyst for integration, community development and civic engagement.	Internal and external cultural and community space is proposed as part of the subject application. This will contribute towards achieving this policy.

		QHSN60	*Community Facilities* To support the development, improvement and provision of a wide range of socially inclusive, multi-functional and diverse community facilities throughout the city where required and to engage with community and corporate stakeholders in the provision of same.	Internal and external cultural and community space is proposed as part of the subject application. This will contribute towards achieving this policy.
Chapter 6 - City Economy and Enterprise	6.5.1	CEE2	*Positive Approach to the Economic Impact of Applications* To take a positive and proactive approach when considering the economic impact of major planning applications in order to support economic development, enterprise and employment growth and also to deliver high-quality outcomes.	The proposed application will bring significant economic benefits to the Naas Road area, both in the construction and operation phase. During the construction phase, a significant quantum of jobs will be created. In the operation phase, there will be jobs created in managing and maintaining the Student Accommodation and the cultural and community space. The retail unit will also provide jobs and importantly, the students will provide workers for the area in the new commercial units provided with the surrounding regeneration schemes, all of which have commercial elements.
		CEE4	*Promoting and Facilitating Indigenous Enterprise Growth* To support the creation of an ecosystem of innovative start-ups, social enterprise, micro-business and small business and, where possible, to promote the development of skills and entrepreneurship, sites for high tech and potential start-ups, smart city programmes and collaboration between public bodies, industries and research.	Cultural and community spaces will be provided on-site, providing 1,422 sq m of internal space and 131 sq m of external space. The cultural space, totalling to 729 sq m, will principally comprise a digital hub and ancillary and storage space. Digital hubs are spaces for people to gather and work together on projects, providing a shared unit that promotes teamwork, innovation and creativity. In this location where there will be a student population and having regard to the proximity to the Ballyfermot College, which specialises in media, it is envisaged that the digital hub space will be utilised for podcasts,

				YouTube studio space, gallery space, kitchen, photography studios, makerspace and general shared working for creatives. The community space, totalling to 512 sq m, will principally comprise a café, co-working areas, and ancillary space. The co-working areas provides space for people generally living in nearby residential developments to use should they wish to work from home, whilst benefiting from an office-like experience. It can also be utilised by start-ups who do not yet have permanent office space. There is also 312 sq m of shared cultural and community space in the form of a shared reception and an accessible break-out space.
	6.5.2	CEE7	*Strategic and Targeted Employment Growth* To promote strategic and targeted growth of strategic development areas and corridors in accordance with the RSES and MASP with a focus on the city centre, the Docklands, the Outer City and Key Urban Villages and Neighbourhood Centres/Urban Villages.	The Naas Road SDRA is a key strategic development area, as recognised in the *Development Plan.*
	6.5.3	CEE12	Transition to a Low Carbon, Climate Resilient City Economy To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.	The development will play a role in supporting this transition due to: • Its proximity to public transport options; • Its proximity to the services and amenities; • The proposed mix of uses; • High efficient air source heat pump technologies; • NZEB compliant; • The scheme's A3 BER rating; and • Decarbonised all electric energy strategy.
		CEE13	*Towards a Green and Circular Economy* To support the growth of the 'green economy' including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the	The proposed development will include highly efficient air source heat pumps which accords with the renewable energy requirement. More details of the air source heat pumps is

			transition towards a circular economy in line with national policy and legislation.	provided in the *Climate Action, Energy and Sustainability Statement* prepared by Delap & Waller submitted herewith. Very low parking levels are proposed having regard to the proposed Student Accommodation use, the proximity to high-quality public transport, the extensive cycle parking proposed and the City Edge Strategic Framework which proposes very limited car-parking within the City Edge area. The *Resource Waste Management Plan* prepared by AWN Consulting will minimise waste and maximise reuse of materials during the demolition and construction stages.
	6.5.5	CEE19	*Regeneration Areas* To promote and facilitate the transformation of Strategic Development and Regeneration Areas (SDRAs) in the city, as a key policy priority and opportunity to improve the attractiveness and competitiveness of the city, including by promoting high-quality private and public investment and by seeking European Union funding to support regeneration initiatives, for the benefit of residents, employees and visitors.	The subject site lies within the Naas Road SDRA and thus its development is actively supported. The proposal is reinforced by private investment and look to decentralise student accommodation away from the City Centre and into a regeneration area that is adjacent to high-quality public transport and provides opportunities for students not just in the City Centre campuses and UCD for example but also campuses such as Tallaght TUD and the Ballyfermot College of Further Education which have not catered for at all in terms of student accommodation provision until now.
	6.5.6	CEE21	*Supply of Commercial Space and Redevelopment of Office Stock* (i) To promote and facilitate the supply of commercial space, where appropriate, including larger office floorplates suitable for indigenous and FDI HQ-type uses. (ii) To consolidate employment provision in the city by incentivising and facilitating the high-quality re-development of obsolete office stock in the city.	The proposal seeks the redevelopment of a part office/part warehouse in this location to a high intensity use provided beside high-quality public transport, in line with the provisions of the compact city.

		CEE26	*Tourism in Dublin* (i) To promote and facilitate tourism as one of the key economic pillars of the city's economy and a major generator of employment and to support the appropriate, balanced provision of tourism facilities and visitor attractions. (ii) To promote and enhance Dublin as a world class tourist destination for leisure, culture, business and student visitors and to promote Dublin as a setting for conventions and cultural events. (iii) To improve the accessibility of tourism infrastructure to recognise the access needs of all visitors to our city.	By default, Student Accommodation development can provide tourist accommodation during the summer months principally. Given the site's location, it is anticipated that summer lets will be to international language students as opposed to families for example. Again, this can contribute to the dearth of supply of such accommodation during the summer months. Like with the Student Accommodation rates, it is anticipated that these will be less than City Centre locations, thus the scheme seeks to provide 'accommodation for all'.
		CEE32	*Education and the City Economy* To promote Dublin as a national and international education centre/student city, as set out in national policy, and to facilitate and promote synergies between education, industry and entrepreneurship with an emphasis on retaining talent in the city, facilitating the expansion of existing economic clusters and the establishment of new clusters, and increasing participation in the city's labour force.	As detailed extensively in the press and via student protests, there is a significant unmet demand for student accommodation in the City. This makes it difficult to promote the City as a 'student city' as per this policy. The proposed development can only contribute positively to this policy.
Chapter 7 – The City Centre, Urban Villages and Retail	7.5.3	CCUV24	*Co - Working Hubs* To support the development of 'hub' workspaces as part of new mixed use developments in Key Urban Villages and urban villages.	As part of the proposed cultural and community spaces, the cultural space, totalling to 729 sq m, will principally comprise a digital hub, and ancillary and storage space. The digital hubs will provide spaces for people to gather and work together on projects, providing a shared unit that promotes teamwork, innovation and creativity. In this location where there will be a student population and having regard to the proximity to the Ballyfermot College, which specialises in media, it is envisaged that the digital hub space will be utilised for podcasts, YouTube studio space, gallery space, kitchen, photography studios, makerspace and general shared working for creatives.

				A co-working area, totalling to 354 sq m of floorspace, is proposed as part of the community space. The co-working areas provides space for people generally living in nearby residential developments to use should they wish to work from home, whilst benefiting from an office-like experience. It can also be utilised by start-ups who do not yet have permanent office space.
		CCUV26	*New Growth Areas* To support and facilitate local shopping and retail services commensurate with new residential areas to provide day to day and top up shopping needs.	The proposed development proposes a retail unit which is intended to be a 250 sq m convenience store to meet the day-to-day needs of the students and the surrounding population.
	7.5.6	CCUV30	*Cafés / Restaurants* To promote and facilitate the provision of cafés / restaurants in the city and support their role in making the city more attractive for residents, workers, and visitors and in creating employment.	The proposed community space will principally comprise a café, co-working areas, and ancillary space. The café will serve members of the public who wish to visit and use the community and cultural spaces, as well as enjoying the vast public open space proposed. Outdoor seating is provided as part of the external community space which will serve the café and provide visitors with somewhere to rest and enjoy the beautiful surrounding public open spaces and the daylighted River Camac. The café will generate a number of employment opportunities by providing students of the accommodation with part time work or local residents with part-time or full-time work.
	7.5.8	CCUV38	*High Quality Streets and Spaces* To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse	The proposed streets and public space will be plentiful and high-quality and will contribute towards providing a vibrant, attractive, accessible and safe development. The proposed streets and public space will be plentiful and high-quality and will contribute towards providing a vibrant,

			communities regardless of age, ability, disability or gender.	attractive, accessible, and safe development. All spaces will be universally accessible. The arrangement of landscape elements such as planters and street furniture will forge a comfortable microclimate within various places of the design and provide a human scale to the outdoor areas. Groundcover planting has been specified to a maximum height of 1m to allow clear sight lines to enhance passive surveillance but also create a feeling of privacy and comfort within the public realm.
		CCUV39	*Permeable, Legible and Connected Public Realm* To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.	The proposed development creates a permeable and legible public realm that contributes to the key objectives of the *Development Plan*. A key aspect of this is the daylighting of the River Camac through the site.
		CCUV40	*Public Safety* To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012.	The proposed development creates a safe public realm with passive surveillance. Please refer to the community Safety Strategy in the *Architectural Design Statement* prepared by HKR Architects.
		CCUV44	*New Development* That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility.	The proposed development will deliver the highest quality and well-designed public realm including open space for use by the community. The public realm and green infrastructure will create linkages and connection and will enhance accessibility. Materials used within the scheme will be durable and high-quality. The daylight of the river will be a key feature of the proposed development. As stated in the *Landscape Design Report* prepared by Stephen Diamond Associates:

				"*Though access to the actual riverbed and embankments is limited, people can experience the riparian zone at the canopy level. Elevated walkways through the riparian vegetation allow a special close-up experience for people to have a direct connection with nature but protect the sensitive riparian environment and wildlife below.*" The beautifully landscaped riparian zone surrounding the daylighted River Camac will attract people to the site, as this is an experience not many people encounter. It is also proposed to improve permeability through the site by connecting the subject site with the Carriglea site to the south. The Connection Plaza has been designed as a pedestrian priority shared surface, ensuring there is a smooth transitional link between the riparian zone at the subject site and the linear park at the Carriglea site.
Chapter 8 – Sustainable Movement and Transport	8.5.1	SMT1	*Transition to More Sustainable Travel Modes* To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle).	The predicted travel patterns for the residents of the proposed development are discussed in section 7 of the Residential Travel Plan report. The analysis within the report, which utilises information obtained from the TRICS database, indicates that there will be a 70 %: 30 % split between public transport use and walking / cycling, which exceeds the Dublin City Council mode share targets.
		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.	The proposed development embodies this policy by providing a more intensive mixed-use development in a location 150 metres of the Luas. Further the scheme proposes the highest quality public realm as detailed extensively throughout this application.

		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.	A *Residential Travel Plan* and a *Public Transport Capacity Assessment* has been compiled and accompanies the planning documentation.
		SMT7	*Travel Plans for New and Existing Developments* To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.	A *Residential Travel Plan* has been compiled and accompanies the planning documentation. This is further accompanied by an assessment of public transport capacity in the area, which shows more than adequate capacity on the Luas for the proposed development.
	8.5.3	SMT9	Public Realm in New Developments To encourage and facilitate the co-ordinated delivery of high-quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.	The proposed daylighting of the river and the surrounding open space along with the new public plaza onto the Naas Road significantly improves the public realm of this current quasi-industrial area. The ground floor arrangements have been carefully designed to maximise active frontage and passive surveillance onto the public realm to create vibrant active spaces and permitting high standards of accessibility.
	8.5.5	SMT12	*Pedestrians and Public Realm* To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.	
		SMT13	*Urban Villages and the 15-Minute City* To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.	Not directly applicable to the proposed development however the scheme includes permeable connections through the site which will benefit active travel.

	8.5.6	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 path network within the development, combined with the proposed upgrade works outside the site boundaries, will provide greater connectivity between the site and neighbouring areas and developments. New pedestrian linkages will be provided to the Carriglea residential development to the south, as well as to the footpath on the Naas Road. A new pedestrian crossing is proposed across the access road to the development. Similarly, cyclists will be able to connect through to the Carriglea residential development if travelling to / from Drimnagh village. Cyclists from the proposed or adjacent developments travelling in the direction of the Naas Rd will benefit from new cycling lanes along the access road. Following consultation with Dublin City Council, provision is also being made for a future Naas Road to Inchicore Active Travel route, by realigning the footpath on the outbound carriageway of the Naas Road.
		SMTO8	*Cycling Infrastructure and Routes* To improve existing cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages, and to create protected cycle lanes, where feasible. Routes within the network will be planned in conjunction with green infrastructure objectives and the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policies GI2, GI6 and GI8 and objective GIo2.	In terms of cycle parking, the proposed development involves the provision of a large quantity of resident, staff and visitor parking. Some 941 No. secure internal bicycle spaces are being provided for the students, which includes 48 No. electric bike and 5 No. cargo bike parking spaces. Some 218 No. spaces are being provided at ground level for visitors to the development. New cycle lanes are proposed to either side of the access road to the development, and provision is being made for the future Naas Road to Inchicore Active Travel route as per of the development.

		SMT10	*Walking and Cycling Audits* Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken.	Walking and cycling audits have been carried out by PMCE Consultants, and the findings of the audits have been incorporated in the final site layouts.
	8.5.7	SMT27	*Car Parking in Residential and Mixed Use Developments* (i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking. (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. (iii) To safeguard the residential parking component in mixed-use developments.	The car parking provision for the proposed development is below the maximum values as outlined in the Dublin City Council Development Plan. It is considered that the reduced level of car parking provision is consistent with the mobility targets for the greater Dublin area as detailed within the NTA Greater Dublin Area (GDA) Transport Strategy in terms of minimising the traffic impact of the proposal and with maximising patronage of the extensive public transport and soft mode options available to the residents and staff.
		SMT29	*Expansion of the EV Charging Network* To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.	It is proposed that 5 No. of the 7 No. spaces provided (or 71%) will be equipped with charging stations, and the other two will have provision for future stations. This will exceed the requirement stated in the DCC development management standards for 50% of all on-site car parking spaces to be fitted with EV charge points.
	8.5.9	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.	The new access road within the development has been designed in accordance with the standards contained within the DMURS document. A section of the road has been designed as a shared surface which will accommodate movement of pedestrians, cyclists and vehicle users. In addition, the existing access road will be upgraded to include cycle lanes to either side. A set-down areas is also to be provide along the side of the access road, set out in accordance with the guidance provided in the DMURS document.

Chapter 9 - Sustainable Environmental Infrastructure and Flood Risk	9.5.1	SI2	*Integrating Water Services with Development* To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.	A Confirmation of Feasibility was received from Irish Water in relation to the proposed development. Please refer to appendix IV of the *Civil Engineering Infrastructure and Surface Water Management Report* by Barrett Mahony Consulting Engineers.
		SI3	*Separation of Foul and Surface Water Drainage Systems* To require all new development to provide separate foul and surface water drainage systems.	The proposed development has been designed with separate foul and surface water drainage system. Refer to Barrett Mahony Consulting Engineers drawing GWH-BMD-ZZ-XX-DR-C-1000 for the proposed layout of the site drainage systems.
		SI4	*Drainage Infrastructure Design Standards* To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).	The proposed development's drainage infrastructure has been designed to comply with the Greater Dublin Regional Code of Practice for Drainage Works as well as the Irish Water Code of Practice for Wastewater and Wastewater Infrastructure Standard Details – refer to Barrett Mahony Consulting Engineers *Civil Engineering Infrastructure & Surface Water Management Report* and drawings.
	9.5.2	SI7	*Water Quality Status* To promote and maintain the achievement of at least good status in all water bodies in the City.	AWN Consulting has prepared a *Hydromorphological Qualitative Technical Assessment* and a *Water Framework Directive (WFD) Screening Assessment*. These reports conclude that the potential effects on the current status of the waterbodies are considered "*no impact i.e., no change to the WFD status (*which includes chemical, ecological and Hydromorphological status*) or elements in terms of the hydrological environment*" and "*no change to the current status or elements in terms of the underlying hydrogeological environment.*"

				During operational phase, as a result of the proposed new development the hydromorphological condition would be significantly improved from 'Poor' to 'Good' at the local scale (refer to the AWN report for further details). Overall, the potential effects on the WFD status to the waterbodies are considered to lead to beneficial effect, i.e., combined impacts have the potential to have a beneficial effect on the WFD element and improvement to the current status or elements in terms of the local hydromorphological environment. This 'non-deterioration' of the status of the hydrological/ hydrogeological environment and the assessed improvement to the local Hydromorphological status would fulfil with this policy in terms of promoting the achievement of 'Good' status in the River Camac catchment.
		SI11	*Managing Development Within and Adjacent to Camac River Corridor* To manage all development within and adjacent to the Camac River Corridor in a way that enhances the ecological functioning and water quality of the river and aligns with the principles for river restoration. All development shall provide for a minimum set-back distance of 10-25m from the top of the riverbank depending on site characteristics. Large development sites in excess of 0.5ha should provide a minimum set-back of 25m from the top of the river bank where informed by a hydromorphological study.	Please refer to the Hydromorphological Qualitative Technical Assessment prepared by AWN Consulting. It should be noted that, as a result of the proposed new development, the hydromorphological condition will be significantly improved from 'Poor' to 'Good' at the site, as established in the River Hydromorphology Assessment Technique (RHAT) guidelines.
		SI12	*River Restoration in Strategic Development and Regeneration Areas* To provide opportunities for enhanced river corridors in the following Strategic Development and Regeneration Areas (SDRAs) in order to harness	The proposed development seeks the de-culverting of the River Camac running through the site which is within SDRA5. This will significantly contribute to the biodiversity of the site and wider area.

			significant opportunities for river restoration where feasible: • SDRA 1 Clongriffin/ Belmayne and Environs • SDRA 3 Finglas Village Environs and Jamestown Lands • SDRA 4 Park West/Cherry Orchard • SDRA 5 Naas Road • SDRA 6 Docklands • SDRA 7 Heuston and Environs • SDRA 9 Emmet Road • SDRA 10 North East Inner City • SDRA 16 Oscar Traynor Road	
		SIO4	*River Basin Management Plan* To implement the EU Water Framework Directive through the implementation of the appropriate River Basin Management Plan and Programme of Measures and individual river restoration strategies where available.	AWN has prepared a WFD Screening Assessment in response to the requirements of the Water Framework Directive. This report concludes that it is not considered that any of the aspects of the proposed development will prevent the WFD objectives from being achieved or to meet the requirements and/or objectives in the second RBMP 2018-2021 (River Basin Management Plan) and draft third RBMP 2022-2027.
		SIO5	*River Basin Management Plan* To take into consideration the River Basin Management Plan and Programme of Measures when considering new development proposals.	AWN has prepared a WFD Screening Assessment in response to the requirements of the Water Framework Directive. This report concludes that it is not considered that any of the aspects of the proposed development will prevent the WFD objectives from being achieved or to meet the requirements and/or objectives in the second RBMP 2018-2021 (River Basin Management Plan) and draft third RBMP 2022-2027.
		SIO6	*Groundwater Protection* To protect ground water resources in Dublin City and to implement the recommendations contained in any Groundwater Protection Scheme prepared under EU Ground Water Directives.	AWN has prepared a WFD Screening Assessment in response to the requirements of the Water Framework Directive. This report concludes that the potential effects on the WFD status to the waterbodies are considered '*no impact i.e., no change to the current status or elements in terms of the underlying hydrogeological environment* (i.e., Dublin Groundwater Body)'.

		SIO7	River Restoration Flagship Projects To support the delivery of flagship river restoration projects where restoration measures can be comprehensively implemented, including the Camac River Corridor. This will include opportunities arising from the regeneration/ development of strategic land banks.	The subject development proposes the restoration of the currently culverted River Camac running through the subject site.
	9.5.3	SI13	*Minimising Flood Risk* To minimise the flood risk in Dublin City from all other sources of flooding as far as is practicable, including fluvial, coastal, reservoirs and dams, the piped water system, and potential climate change impacts.	Barrett Mahony Consulting Engineers have prepared a *Flood Risk Assessment Report* which concludes that the proposed development is at a negligible risk of flooding from external sources, and similarly that the development, including the daylighting proposal, offers a negligible risk to adjacent developments. Climate change impacts have been taken into account in the *Flood Risk Assessment Report*, as well as in the drainage infrastructure design for the proposed development.
		SI14	*Strategic Flood Risk Assessment* To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028, including all measures to mitigate identified climate change and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Justification Tests, and to have regard to the Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans.	The proposed development considers the Strategic Flood Risk Assessment prepared as part of the *Dublin City Development Plan 2022-2028* and has been referenced in the *Flood Risk Assessment Report* by Barrett Mahony Consulting Engineers.
		SI15	*Site-Specific Flood Risk Assessment* All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:	Barrett Mahony Consulting Engineers have prepared a *Flood Risk Assessment Report* for inclusion with this LRD application. The sequential approach to determining whether a particular development is appropriate for a specified location in terms of

			• The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 and any future amendments, and the Strategic Flood Risk Assessment (SFRA) as prepared by this development plan. • The application of the sequential approach, with avoidance of highly and less vulnerable development in areas at risk of flooding as a priority and/ or the provision of water compatible development only. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change and those associated with existing flood defences. The SSFRA will include site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. Allowances for climate change shall be included in the SSFRA. • On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at significant risk of flooding, the sequential approach to development will be applied, and development will be limited to	flood risk is detailed within the report and concludes that the development is deemed 'Appropriate' at this location.

			Minor Development (Section 5.28 of the Planning System and Flood Risk Management Guidelines 2009) on the portion at significant risk of flooding. There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding which do not have existing development on them.	
		SI19	*Provision and Upgrading of Flood Alleviation Assets* To facilitate the provision of new, or the upgrading of existing, flood alleviation assets where necessary and in particular, the implementation of proposed flood alleviation schemes, on the Santry, Camac, Dodder, Wad, Naniken, Mayne, Tolka and Poddle rivers as well as Clontarf Promenade, Sandymount/ Promenade (northwards towards Irishtown Nature Park subject to the outcome of a flood/ environmental study), Liffey estuary and any other significant flood risk areas being progressed through the planning process to completion during the lifetime of the 2022-2028 Dublin City Development Plan, with due regard to the protection of natural heritage, built heritage and visual amenities, as well as potential climate change impacts.	The proposed development involves the daylighting of the existing Camac culvert which runs below the site, along with the provision of a riparian corridor which will act as a flood plain during periods of extreme storm flows. It has been demonstrated in Section 3 of the Barrett Mahony Consulting Engineers *Civil Engineering Infrastructure and Surface Water Management Report* that the flood waters will be contained within the riparian corridor. As a result, it is not necessary to provide any further flood alleviation assets within the site.
		SI20	Basement Flood Risk Management That there is a general presumption against the development of basements for residential use below the estimated flood levels for Flood Zones A or B (see Section 15.18.4 and Appendix 9 for further guidance).	The development includes a basement; however, the lowest residential accommodation within the development is at first floor level. The basement and ground floor spaces will be for amenity, community, cultural and retail uses. In addition, we note that the site is located in Flood Zone C, so the risk of flooding within the development is low.

		SI21	*Managing Surface Water Flood Risk* To minimise flood risk arising from pluvial (surface water) flooding in the City by promoting the use of natural or nature-based flood risk management measures as a priority, by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits, and climate adaption.	SuDS drainage systems have been incorporated into the Development. Please refer to Barrett Mahony Consulting Engineers *Civil Engineering Infrastructure & Surface Water Management Report* and relevant drawings. Proposed SUDS methodologies include green roof, blue roof, permeable paving, bio-retention areas, tree pits, and attenuation basins.
	9.5.4	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.	SuDS drainage systems have been incorporated into the Development. Please refer to Barrett Mahony Consulting Engineers *Civil Engineering Infrastructure & Surface Water Management Report* and relevant drawings. Proposed SUDS methodologies include green roof, blue roof, permeable paving, bio-retention areas, tree pits, and attenuation basins.
		SI23	*Green Blue Roofs* To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue	Green and blue roofs are provided for within the development. Please refer to Barrett Mahony Consulting Engineers *Civil Engineering Infrastructure & Surface Water Management Report*

			roof designed in accordance with the requirements of Dublin City Council's Green & Blue Roof Guide (2021) which is summarised in Appendix 11.	and relevant drawings. Both extensive and intensive green roofs are being provided, and the combined provision exceeds DCC's minimum coverage of 70% / 50 %.
		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.	Please refer to Barrett Mahony Consulting Engineers' *Civil Engineering Infrastructure and Surface Water Management Report* (Section 2 - Surface Water Management) which details surface water management proposals.
	9.5.5	SI27	*Sustainable Waste Management* To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective. To support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).	AWN consulting has prepared a *Resource & Waste Management Plan* and a *Construction Environmental Management Plan* to effectively manage construction & demolition waste in line with current Irish legislation and guidance. AWN has also prepared an *Operational Waste Management Plan* to manage waste that is produced during the operational phase of this development. These plans have been prepared to support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).
		SI28	*Sustainable Waste Management* To prevent and minimise waste generation and disposal, and to prioritise prevention, recycling, preparation for reuse and recovery in order to develop Dublin as a circular city and safeguard against environmental pollution.	AWN consulting has prepared a *Resource & Waste Management Plan* and a *Construction Environmental Management Plan* to effectively manage construction & demolition waste in line with current Irish legislation and guidance. AWN has also prepared an *Operational Waste Management Plan* to manage waste that is produced during the operational phase of this development.
		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	An *Operational Waste Management Plan* has been prepared by AWN Consulting to ensure that the management of waste during the operational phase of the proposed Development is undertaken in accordance with the current legal and industry standards including, the Waste Management Act 1996 as

			possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance, see Appendix 7).	amended and associated Regulations, Environmental Protection Agency Act 1992 as amended, Litter Pollution Act 1997 as amended, the 'Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021', the Draft National Waste Management Plan for a Circular Economy (NWMPCE) (2023) and Dublin City Council (DCC) 'Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws' 2018. In particular, this OWMP aims to provide a robust strategy for the storage, handling, collection and transport of the wastes generated at Site.
		SIO16	*Eastern-Midlands Region Waste Management Plan* To support the implementation of the Eastern Midlands Regional Waste Management Plan 2015–2021 and any subsequent plans in order to facilitate the transition from a waste management economy towards a circular economy.	The *Operational Waste Management Plan* prepared by AWN Consulting has been prepared in accordance with current legal and industry standards including *Eastern Midlands Regional Waste Management Plan 2015–2021 and the Draft National Waste Management Plan for a Circular Economy*.
	9.5.6	SI33	*Remediation of Contaminated Sites* That all potentially contaminated sites shall be remediated to internationally accepted standards prior to redevelopment. Any unearthed contaminants will require some form of remediation measures which may require a licence from the Environmental Protection Agency (EPA).	A comprehensive ground investigation and environmental assessment of the existing site was carried out and is included in Appendix I of the Barrett Mahony Consulting Engineers *Basement Impact Assessment* report. The Waste Classification Report concluded that samples from only one trial pit would be classified as hazardous, while the '*remainder of the material sampled if being considered a waste can be classified as non-hazardous'*. All material to be removed from the site will be taken to an appropriate facility for treatment or disposal in accordance with the EPA requirements.
		SIO19	*Consultation with Regional Waste Management Office* To liaise with the Regional Waste Management Office when considering proposals for the development of brownfield sites that require the offsite disposal of contaminated waste.	No significant levels of contamination were encountered, as noted in the Waste Classification report for the site.

	9.5.8	SI38	*Noise Sensitive Development* To ensure that new residential development close to approved commercial uses is suitably sound insulated (for further guidance, see Sections 15.14 and 15.18.9).	The development site has been assessed in terms of the surrounding noise sources. The surrounding area is dominated by road traffic with minimal contribution from adjacent commercial areas. The future zoning of the surrounding area is for mixed residential uses which will not result in any additional new noise sources to the surroundings which will have a negative noise impact on the proposed development. The *Inward Noise Impact Report* prepared by AWN Consulting sets out an assessment of noise levels across the development buildings and sound insulation performance specification for the building façade to control noise intrusion from external noise sources. The development buildings will be designed to ensure suitable internal sound insulation between the student accommodation units and the community floor areas. This will be undertaken as part of the detailed design of the building.
	9.5.9	SI41	*Lighting Standards* To provide and maintain high quality and appropriate street/ outdoor lighting on public roads, footways, cycleways, public realm throughout the City in accordance with the Council's Vision Statement for Public Lighting in Dublin City and related public lighting projects. In general, the lighting of roads and public amenity areas shall be provided in accordance with the requirements of the latest Public Lighting Standards IS EN13201 and further updates.	The scheme has been designed in accordance with the relevant guidance set out in European Lighting Standards IS EN 13201 and the DAC consultant from TGD Part M or BS8300. Lighting design has been developed to the following design standards and guides. BS EN 13201 - Road Lighting. BS 5489-2020 - Design of road lighting. CIBSE Lighting Guide 6: The exterior environment. CIBSE Lighting Guide 9: Lighting for communal residential buildings. Dublin City Council - Public Lighting Specification. Guidance Notes for the Reduction of Obtrusive Light GN01:2011. BS 5489-1:2013 Code of practice for the design of road lighting.
		SI42	*Light Pollution* To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of	The scheme has been designed with ecological considerations integral to the process. Lighting has been designed and selected to ensure light spillage has been minimised. Guidance

			public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.	in CIBSE Bats & Lighting in the UK – Bats and the Built Environment series Guidance Note 08/18 has been considered in addition to the ILP Guidance Note for the reduction of Obtrusive Light GN01:2011. The site has different levels of zoning, including having a dark zone for bats. The *Outdoor Lighting Report* prepared by Delap & Waller illustrates zoning and outlines the specification requirements of lighting equipment to minimise light spill.
		SI43	*Energy Efficient Lighting* To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.	All public and external areas will be appropriately and safely lit and the lighting specification has been selected for an energy efficient development. High efficient LED fittings with appropriate occupancy and or daylight sensors have been specified to minimise energy associated with artificial lighting.
Chapter 10 - Green Infrastructure and Recreation	10.5.1	GI2	*Connectivity* To develop an interconnected green infrastructure network of strategic natural and semi-natural areas with other environmental features including green spaces, rivers, canals, the coastal and marine area and other physical features including streets and civic spaces that supports ecological, wildlife, and social connectivity.	The proposed development will contribute to providing an interconnected green infrastructure network in the city by daylighting the River Camac and providing open space connections through the site from the Naas Road to the Carriglea site behind.
		GI3	*Multi-functionality (GI)* To ensure delivery of multifunctional green and civic spaces that meet community needs, support biodiversity, promote active and passive recreation, flood and surface water management and local habitat improvements. The multi-functionality of spaces will be balanced against the need to protect and enhance	The proposed development will provide multi-functional spaces including the daylighting of the River and further multi-functional open spaces throughout the site.

			local habitat and the recreational and functional requirements of parks.	
		GIO1	*Green Roof Guidance Document (2021)* The use of green / blue roofs in developments will be in accordance with the requirements of the Dublin City Council Green and Blue Roof Guide Document (2021), see Appendix 11.	Green and blue roofs are provided for within the development. Please refer to Barrett Mahony Consulting Engineers *Civil Engineering Infrastructure and Surface Water Management Report* and relevant drawings. Both extensive and intensive green roofs are being provided, and the combined provision exceeds DCC's minimum coverage of 70% / 50 %.
	10.5.2	GI9	*European Union Natura 2000 Sites* To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites).	An *Appropriate Assessment Screening Report* has been prepared for the proposed development application. This report has assessed and screened out any potential sources of significant adverse effects to EU sites as a result of the proposed development.
		GI10	*Flora and Fauna Protected under National and European Legislation Located Outside Designated Areas* • To adequately protect flora and fauna (under the EU Habitats and Birds Directives), the Wildlife Acts 1976 (as amended), the Fisheries Acts 1959 (as amended) and the Flora (Protection) Order 2022 S.I No. 235 of 2022, wherever they occur within Dublin City, or have been identified as supporting the favourable conservation condition of any European sites.	An *Ecological Impact Assessment (EcIA*) has been prepared for the proposed development which addresses the protection of flora and fauna under the EU Habitats and Birds Directives), the Wildlife Acts 1976 (as amended), the Fisheries Acts 1959 (as amended) and the Flora (Protection) Order 2022 S.I No. 235 of 2022.
		GI11	*Proposed Natural Heritage Areas* To protect and enhance the ecological functions and connectivity of habitats and species of proposed Natural Heritage Areas (pNHAs) to be designated by the National Parks and Wildlife Service (NPWS).	An *EcIA* has been prepared for the proposed development which addresses potential impacts to nationally designated sites, including pNHAs.

		GI12	*National and International Sites for Nature Conservation* To protect sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.	An *EcIA* has been prepared for the proposed development which addresses potential impacts to sites under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.
		GI13	*Areas of Ecological Importance for Protected Species* To ensure the protection, conservation and enhancement of all areas of ecological importance for protected species, and especially those listed in the EU Birds and Habitats Directives, including those identified as supporting the favourable conservation condition of any European sites, in accordance with development standards set out in this plan.	An *AA Screening Report* and *EcIA* have been prepared for the proposed development which address the protection and conservation of areas of ecological importance for protected species.
		GI14	*Ecological / Wildlife Corridors* To maintain and strengthen the integrity of the city's ecological corridors and stepping stones which enable species to move through the city, by increasing their connectivity [to be shown in the proposed Green Infrastructure Strategy] under Article 10 of the EU Habitats Directive. Development proposals should not compromise their ecological functions and should realise opportunities to contribute to enhancing the nature conservation value of them by landscaping that provides complementary habitats. An Ecological Impact Assessment will be required for any proposed development likely to have a significant impact on habitats and species of interest on or adjacent an ecological corridor.	An *EcIA* has been prepared for the proposed development to address potential significant impacts on habitats and species of interest on or adjacent to an ecological corridor. The daylighting of the River Camac, along with the associated landscaping and creation of riparian habitat, will create a stepping stone to enable species to move through the city.
		GI15	*Inland and Sea Fisheries* To protect inland and sea fisheries and take full account of Inland Fisheries Ireland Guidelines 'Planning for Watercourses in the Urban Environment'	An *EcIA* has been prepared for the proposed development to address the protection of nearby rivers, streams, watercourses, estuaries, shorelines and their associated habitats.

			2020, when undertaking, approving or authorising development or works which may impact on rivers, streams, watercourses, estuaries, shorelines and their associated habitats. To protect sea angling sites designated by Inland Fisheries Ireland at the North and South Bull Walls and at Dollymount and Sandymount Strands.	
		GI16	*Habitat Creation and New Development* That new developments (as appropriate) will be required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.	Swift nesting blocks and bat boxes have been incorporated into the elevations of the proposed development, which will support local biodiversity. The proposed development includes the daylighting of the River Camac and creation of native riparian habitats, which will offer suitable habitats for small mammals, birds, bats, and amphibian species. A *Biodiversity Enhancement Plan* (BEP) has been prepared for the proposed development and details how it will support local biodiversity into the future.
		GI17	*Habitat Restoration* To increase the percentage of restored and naturalised areas on public land in the city. That new development on private and public lands should provide opportunities for restoration of degraded habitats and soils where feasible and provide for their long-term maintenance to limit degradation.	A *BEP* has been prepared for the proposed development and details how it will support local biodiversity into the future. The proposed development's landscaping provides for increased tree, shrub and other planting to replace any vegetation lost at the site. The daylighting of the River Camac will also restore an area of native riparian habitat.
		GI18	*Minimise Impact – Light and Noise* To minimise the environmental impact of external lighting and noise at sensitive locations to achieve a sustainable balance between the needs of an area, the safety of walking and cycling routes and the protection	Bat friendly lighting has been incorporated into the design as detailed in the *EcIA* to minimize potential impacts to local bats.

			of sensitive species such as bats (see also Section 9.5.9 Public & External Lighting).	
		GIO7	*National Biodiversity Action Plan 2017-2021* To support the management targets for nature conservation sites set out in the National Biodiversity Action Plan 2017 (and as updated) and the objectives for local authorities to address threats to biodiversity.	The proposed development will continue to provide and support biodiversity at the site and will not impact on any designated sites. A *BEP* has been prepared for the proposed development and details how it will support local biodiversity into the future.
		GIO8	*Dublin City Biodiversity Action Plan 2021 - 2025* To support the implementation of the 'Dublin City Biodiversity Action Plan 2021–2025' (or as updated), which sets out key themes and objectives for biodiversity conservation and restoration and measurable targets and actions, in partnership with all relevant stakeholders.	The proposed development will continue to provide and support biodiversity at the site through the daylighting of the currently culverted River Camac and the inclusion of semi-natural habitats and resources for local flora and fauna. The proposed Development specifically supports objectives 2, 6, 8, 10, 11, 12, 13, and 15.
		GIO9	Invasive Alien Species To support measures to prevent the introduction of and to control the spread of invasive alien species in Dublin City in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 and EU Regulations 1143/2014 and to implement the targets and actions set out in the Dublin City Invasive Alien Species Action Plan 2016 – 2020 (or as updated).	The *EcIA* prepared for the proposed development details the measures to be adhered to in order to manage the invasive alien species present at the site.
		GIO10	*All Ireland Pollinator Plan 2021 - 2025* To have regard to the all-Ireland Pollinator Plan 2021 – 2025 in the management of the Council's open spaces, parks and roadside verges and to encourage the pollination of vacant, derelict and temporary sites through measures to protect and increase the populations of native wild bees and other pollinators.	The All-Ireland Pollinator Plan 2021 – 2025 has been considered in the landscaping proposed for the site and in the *Biodiversity Enhancement Plan*.

	10.5.3	GI20	*Views and Prospects* To protect and enhance views and prospects which contribute to the appreciation of landscape and natural heritage.	A *Townscape and Visual Impact Assessment* has been prepared by Modelworks. There are 2 No. Houses of architectural value to the north of the site across the Naas Road, namely 'Naisetra' and 'Landsowne House'. Whilst the 2 No. Buildings have recognised architectural heritage value, there are several factors that lessen their sensitivity to the proposed development. This includes: • The character and quality of their existing townscape context, which is dominated by industrial and commercial use and transport infrastructure. • The separation and buffering from the site to the protected structures by the Naas Road corridor measuring c. 35 metres. • The enclosure of the protected structures by mature trees in its garden. These protected structures are located within an evolving high density, mixed use urban centre. While the structures warrants protection from change or harm, it is not sustainable that it determines the typology or scale of development in this location. In the 21st century urban environment, such juxtapositions of type, scale and architecture are not unusual and are in fact desirable in that they add character and visual interest. Nevertheless, efforts have been made to help screen the proposed development from Naisetra. Please refer to Section 12 on the drawing No. 22-579-SDA-PD-DR-XX-210 created by Stephen Diamond Associates which has been provided to illustrate the buffer planting on the Gowan site relative to existing vegetation within the Naisetra garden around the protected structure along Naas Road during winter.

				Existing evergreen planting provides a considerable level of screening between the proposed new development on the Gowan site and the Naisetra site. Further screening will be provided by the proposed buffer planting consisting of large native evergreen trees and a scrub and ground cover layer of vegetation along Naas Road on site to mitigate any potential negative visual impact caused by the new development. With regards to Drimnagh Castle, the castle is a cultural and architectural heritage site of high value. Its sensitivity is lessened somewhat, however, by the existing and emerging urban context. It is also well removed from the site (by c. 300 metres) and buffered from it by school playing fields and the development currently under construction on the Carriglea site. Please see Verified View Montages No. 11 and 12 prepared by 3D Design Bureau for reference.
	10.5.4	GI24	*Multi-Functionality (GI)* To incorporate new open space into the green infrastructure network for the city, and providing a multi-functional role including: outdoor recreation, biodiversity, urban drainage, flood management, connection and carbon absorption without compromising public access to and the amenity function of open space (see Section 15.6: Green Infrastructure and Landscaping).	The subject site comprises both hard and soft landscaping, with a focus on increasing the green and blue infrastructure on site. As detailed in the *Landscape Design Report* by Stephen Diamond Associates, the aim of the soft landscaping proposed is to "*recreate the sensory experience of lush Irish nature*". To help recreate this experience, the use of native species is maximized. The proposed development seeks to daylight the River Camac, significantly improving the biodiversity of the site. Members of the public and students will not be granted access to the riparian zone as it seeks to protect the new flora and fauna. However, an elevated walkway for members of the public to use at ground floor level, a 91 sq m balcony running along the externality of Block 2 at basement level which will be part of the shared cultural and community space, as well as an

				extended balcony at basement level of Block 1 for external student amenity space, will all benefit from extensive views across the beautifully landscaped riparian zone. As well as this, there are new public open spaces proposed across the site, promoting new tree planting and shrubs to produce dynamic and sensual external spaces.
		GI28	*New Residential Development* To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.	The scheme includes a large quantum of accessible public open space (30% of the site area) as well as the amenity provided via daylighting the River, which contributes another 13% open space to the site.
	10.5.5	GI29	*Protect Character of River Corridors* To protect, maintain, and enhance the watercourses and their river corridors in the city and to ensure that development does not cover or encroach upon rivers and their banks. To maintain natural river banks and restore them as part of any new development. The creation and/or enhancement of river corridors will be required and river restoration opportunities where possible will be supported to help improve water quality, and ecology, provide natural flood relief as well as providing amenity and leisure benefits.	The proposed development seeks to daylight the culverted River Camac, opening up the river and creating new riverbanks through the site. It is anticipated that this will bring many benefits including improved water quality, significantly increased biodiversity, natural flood relief and visual amenity. The restoration of the river allows the provision of a linear park connecting the Naas Road to the Carriglea site to the rear. Currently, the riverscape character within this area is unnoticeable to people as the River Camac is buried in a culvert 7-10 No. metres below the surface in an approximately 5m wide culvert. As part of the development of the Gowan site, this river will be daylit to restore and recreate a river ecosystem and re-establish the riparian character in this heavily industrialised area of the city which is undergoing a redevelopment into a more residential-led mixed-use area.

				The lid of the culvert will be removed from a length of 76 metres, clean approved topsoil and subsoil will be imported on the site to provide appropriate conditions for riparian vegetation to establish and improve the current status of the River Camac. A variety of habitats are proposed to be created such as still-life wetland areas in the form of 3 wildlife ponds to further strengthen the riverscape riparian character. An elevated walkway over the riparian zone is provided at the canopy level to provide an opportunity for people to have close contact with nature without disturbing the area.
		GI31	*Protect and Improve Ecological Status of Rivers under the EU Water Framework Directive* To support the improvement of the ecological status of all rivers / waterbodies within the administrative area of Dublin City Council and those rivers identified in accordance with the River Basin Management Plan 2018 – 2021 and the next management plan to be produced under the 3rd river basin planning cycle (2022-2027), as required under the EU Water Framework Directive (see Chapter 9, Section 9.5.2 Urban Watercourses and Water Quality).	AWN Consulting has prepared a *Hydromorphological Qualitative Technical Assessment* and a *Water Framework Directive (WFD) Screening Assessment*. These reports conclude that the potential effects on the current status of the waterbodies are considered "*no impact i.e., no change to the WFD status* (which includes chemical, ecological and Hydromorphological status) *or elements in terms of the hydrological environment*" and "*no change to the current status or elements in terms of the underlying hydrogeological environment.*" During operational phase, as a result of the proposed daylighting of the Camac River, the hydromorphological condition of this watercourse would be significantly improved from 'Poor' to 'Good' at the local scale (refer to the AWN report for further details). Overall, the potential effects on the WFD status to the waterbodies are considered to lead to beneficial effect, i.e., combined impacts have the potential to have a beneficial effect on the WFD element and improvement to the current status or elements in terms of the local hydromorphological environment and its ecological status.

				This 'non-deterioration' of the status of the hydrological/ hydrogeological environment and the assessed improvement to the local Hydromorphological status would fulfil with this policy in terms of promoting the achievement of 'Good' status in the River Camac catchment.
		GI32	*Linear Parks and Recreational Use of Waterways Aspects* To develop linear parks, sustainable riverine access, walkways, cycleways and water focused recreational, sporting and tourism amenities which enhance appreciation of rivers in a manner that ensures that any adverse environmental effects are avoided and ecological enhancements, where appropriate, are employed to ensure a net biodiversity gain. Where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway.	A Canopy Elevated Walkway is proposed to provide recreational use on-site to enhance the appreciation of the River Camac in a manner that ensures that any adverse environmental effects are avoided to the proposed Riparian Zone below. The current culverted river is 7-10 metres below the surface of the site and due to the size of the site relative to the depth at which the river flows, providing a direct connection for people is not feasible. As per Dublin City Council's Parks Department request, the river and the vegetated areas around it have been set aside for nature (Riparian Zone - 13% of the site 1261m2) with access only allowed by two ladders one at each side of the river corridor for maintenance purposes. A series of spaces and routes (Central Plaza, The Riparian Zone and the Elevated walkway, Connection Plaza) create a continuation of the linear park open space from Carriglea Development on Gowan Site towards Naas Road.
		GI34	*New Development and Public Open Space along River Corridors* To ensure that new development, in terms of siting and design, responds to the character, importance and setting of the city's rivers where the context allows, and to require public open space which is to be provided as part of new development, to supplement riparian buffer zones so as to support the attainment of 'good ecological status' or higher for water bodies,	Benches have been provided in south-oriented areas and in areas that warrant the best views of the river and the surrounding urban environment. Some 50% of the benches will have backrests and armrests to accommodate the various needs of different individuals. Large sculptural boulders form part of the land art proposed and can be used as informal seats and as catalysts for spontaneous play amongst people of all ages.

			flood management, the conservation of biodiversity and ecosystem functions.	Some 13% of the overall site has been designed as a Riparian Zone to restore the riverscape character of the River Camac which flows through the centre of this site. Providing this area will enhance biodiversity and the various bioengineering approaches to the river bed and embankments will contribute positively to improving the quality of water of this river. Large boulders and weirs will aerate the water and the gabion mattress filled with stones proposed on the bed of the retained culvert bed will encourage sediment deposition creating a naturalistic environment and potentially creating appropriate conditions for fish spawning.
	10.5.7	GI40	*aa Planting - General* To require appropriate and long-term tree and native hedgerow planting in the planning of new development, urban spaces, streets, roads and infrastructure projects. New development should seek to provide for additional tree planting using a diversity of species including native species as appropriate to the location of the development in the interests of natural heritage, amenity, environmental quality and climate resilience.	Only native hedgerows and tree species are specified to be planted on site within the riparian corridor, ground floor public realm, basement level student area and roof gardens to promote Irish nature in the interest of natural heritage amenity quality and climate resilience. Some 225 No. new trees native will replace 34 No. existing (mixed native and non-native trees) trees on site. This represents a circa. 662% increase of trees on site.
		GI41	*Protect Existing Trees as Part of New Development* To protect existing trees as part of new development, particularly those that are of visual, biodiversity or amenity quality and significance. There will be a presumption in favour of retaining and safeguarding trees that make a valuable contribution to the environment.	The existing trees on site have been previously pruned, and in some instances the pruning has been particularly harsh. Notwithstanding this, many trees have already suckered and regrown. Such pruning may lead to structural issues later in life and predisposition towards failure. In some instances, the extent of tree pruning has been both disfiguring and structurally harmful and for this reason, many trees have been downgraded from potential category "B" to category "C". Ultimately, the poor quality of many of the trees on the site, combined with the consumption of space, exacerbated by the separation of the proposed blocks to accommodate the

				daylighting of the River Camac means that tree retention is not practicable within this development.
		GI42	*Tree Management* To adopt a pro-active and systematic good practice approach to tree management with the aim of promoting good tree health, condition, diversity, public amenity and a balanced age-profile and as per Dublin City Tree Strategy 2016.	Tree management proposals for retained trees during construction are outlined within the Arboricultural Report and the Tree Impacts Plan prepared by The Tree File.
		GI43	*Hedgerows* To protect and enhance the City's hedgerow network, in particular, hedgerows that form townland, parish and barony boundaries. It is Council policy to increase hedgerow coverage and promote the planting of hedgerows in new developments using native species.	There are no hedgerows on the existing site which is a hardstanding car park and warehouse/office building. Only native hedgerows (holly-*Ilex aquifolium* and Privet-*Ligustrum vulgare*) have been utilised on site as part of the planting scheme to enhance biodiversity, promote Irish nature on site and contribute towards providing corridors for wildlife within this site along the boundaries.
		GI44	*Resilient Urban Forest* To deliver and manage a resilient urban forest for the City to help increase resilience to the effects of climate change to consist of native and exotic trees and to target and prioritise locations in the city with a low canopy cover for an increased level of tree cover.	Some 225 No. new native Irish trees are proposed to be planted on site to increase the canopy coverage within this heavily urbanised area, to create a variety of habitats for wildlife species such as birds and to recreate a riparian corridor along the culverted River Camac.
	10.5.8	GI45	*National Physical Activity Plan 2016* To improve the health and well-being of communities by increasing access to participation in sports, recreation and healthy activity in line with the National Physical Activity Plan 2016, the Healthy Ireland Framework 2019 – 2025 and the Sport Ireland Participation Plan 2021 – 2024.	Consideration has been given to creating an environment for the future residents of Gowan site as well as for the visitors and residents from surrounding future residences to contribute positively to the health and well-being of communities by increasing access to participation in sports, recreation and healthy activity in line with the various Actions outlined in *National Physical Activity Plan 2016*, the *Healthy Ireland Framework 2019 – 2025* and the *Sport Ireland Participation Plan 2021 – 2024*.

				This site has been designed to prioritise pedestrian and cyclist use over vehicular. Some 218 No. visitor bicycling parking spaces have been accommodated on-site to encourage people to travel to this site on a bicycle rather than a car for which there might not be a parking space available. The DMURS document has been followed to create a vibrant, safe urban environment that promotes sustainable travel patterns. The daylighting of the River Camac created an exceptional opportunity to increase biodiversity, amenity and canopy and vegetation cover which will contribute towards improving the air quality along the Naas Road and provide a healthier outdoor environment for people who will participate in active recreation such as walking and running within and through this site. Gathering spaces and routes the site creates opportunities for all ages and abilities to engage in active recreation and explore the site and surrounding context. All accessible areas for students and the wider public have been designed as level to meet current building regulations and best practice provided by the relevant guidance documentation e.g. Technical Guidance Document Part M – Access and Use Building Regulations (2022) and 'Building for Everyone: A Universal Design Approach' by the National Disability Authority, DMURS. The elevated proposed routes through and along the Riparian Zone create a connection between Naas Road and the existing City Wide Green Route to the City Centre east and Adamstown to the west.

				Connections from the Gowan site follow the highlighted new City Wide Green Route depicted in the recently expired LAP for the Naas Road area. The Gowan site connects to Carriglea Development northwards to Lansdowne Vally Park to Grand Canal providing a cycle and pedestrian connection to Dublin city centre along an attractive, safe nature trail along Camac River and Grand Canal waterways. Spaces such as the Central and Connection Plaza are the perfect opportunity meeting places for various running groups to begin or end their runs, along future routes in future and existing green space in the vicinity of this site.
Chapter 12 – Culture	12.5	CU2	*Cultural Infrastructure* To ensure the continued development of Dublin as a culturally vibrant, creative and diverse city with a broad range of cultural activities provided throughout the city, underpinned by quality cultural infrastructure.	The provision of culture/community space in the scheme will contribute towards achieving this policy.
	12.5.1	CU4	*Cultural Resources* To support the development of new and expanded cultural resources and facilities within the city that enrich the lives of citizens and visitors, provide new opportunities for engagement and celebrate aspects of our history and culture.	The provision of culture/community space in the scheme will contribute towards achieving this policy.
	12.5.2	CU7	*Cultural Clusters and Hubs* To support existing, and encourage the growth of, emerging cultural clusters and hubs within the city, which bring together cultural activities interlinked with supporting uses (such as restaurants, retail, galleries and venues) to create vibrant, defined cultural quarters and communities within the city that give a variety of cultural experiences to all.	The provision of culture/community space in the scheme will contribute towards achieving this policy.

	12.5.3	CUO25	*SDRAs and large Scale Developments* All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area* must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. *Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.	The proposed development is over 10,000 sq m and with a SDRA and provides over 5% community, arts, and cultural spaces. The proposed cultural and community spaces will provide 1,422 sq m of internal space and 131 sq m of external space, 5.78% of the total gross floor area. The cultural space, totalling to 729 sq m, will principally comprise a digital hub, and ancillary and storage space. Digital hubs are spaces for people to gather and work together on projects, providing a shared unit that promotes teamwork, innovation and creativity. In this location where there will be a student population and having regard to the proximity to the Ballyfermot College, which specialises in media, it is envisaged that the digital hub space will be utilised for podcasts, YouTube studio space, gallery space, kitchen, photography studios, makerspace and general shared working for creatives. The community space, totalling to 512 sq m, will principally comprise a café, co-working areas, and ancillary space. The co-working areas provides space for people generally living in nearby residential developments to use should they wish to work from home, whilst benefiting from an office-like experience. It can also be utilised by start-ups who do not yet have permanent office space. There is also 312 sq m of shared cultural and community space in the form of a shared reception and an accessible break-out space.
		CUO30	*Co-Design and Audits* Large development applications (over 10,000 sq. m., either in phases or as one application) will, in the absence of a DCC local area culture audit (CUO44 refers), be required to undertake a cultural audit for the	A *Cultural and Community Infrastructure (Impact) Assessment* is enclosed which has been prepared by Turley.

			local area to identify shortcomings within the area; and to work with DCC Arts Office to identify and agree appropriate arts or cultural uses, preferably as part of a co-design process in advance of lodging an application, for inclusion in the development. Such audits shall be informed by the existing cultural mapping resources in the Dublin City Cultural Infrastructure Study and by Culture Near You maps.	
	12.5.4	CU22	*Range of Cultural and Amenity Options* To seek and encourage a range of cultural and amenity options for residents and visitors within the city that are independent of licenced premises to allow options for younger people, families, elders and others to engage and enjoy a range of activities in the city during evening hours.	The provision of culture/community space in the scheme will contribute towards achieving this policy.
		CUO47	*Accessibility* To encourage people of all abilities and ages including wheelchair users to take part fully in the city's culture as consumers, creators, artists and workers by supporting a high standard of accessibility in new and existing cultural assets.	Hard and soft landscape and streetscape elements will be fully detailed and completed to the required level to meet current building regulations and best practice provided by the relevant guidance documentation e.g. Technical Guidance Document Part M – Access and Use Building Regulations (2022) and 'Building for Everyone: A Universal Design Approach' by the National Disability Authority, DMURS. All external areas are universally accessible to encourage people of all abilities and ages including wheelchair users to take part fully in the city's culture as consumers, creators, artists.
	12.5.6	CUO54	*Naming of New developments* To ensure that all new developments are named in the Irish language only, to redress the historic under-representation of Irish language names in the City; whilst also reflecting the rich diversity of history and origins of place names and townland names within	Will be agreed at compliance stage with Dublin City Council.

			Dublin and also names that are reflective the social history of each place. All place names installed for new streets or estates must be bi-lingual.	
	12.5.7	CUO58	*Public Art* All large-scale regeneration schemes, whether lodged for planning as a single or multiple applications; where the total scale of regeneration exceeds 25,000 sq. m. shall be required to include an element of public art.	The scheme includes provision for public art in a form of a large totem-style sculpture relating to the chosen theme of Wildlife of the River Camac in the Central Plaza indicated in the location shown on the Landscape Masterplan drawing 22-579-SDA-PD-DR-GF-001 and Section 10 on drawing 22-579-SDA-PD-XX-209. Information can also be found on Page 20 of the Landscape Report provided.
Chapter 13 - Strategic Development Regeneration Areas	13.2.1	SDRAO1	To support the ongoing redevelopment and regeneration of the SDRA's in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles: **Architectural Design and Urban Design**: All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter 15 in order to create long term, viable and sustainable communities aligned with the principles of the 15- minute city. **Phasing:** Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.	**Architectural Design and Urban Design:** The development contributes to healthy placemaking in the area by daylighting the River Camac and the provision of attractive public open and community spaces. Careful consideration has also been given to the location of uses on the ground floor, in order to maximise active frontage throughout the site to create a vibrant and active public realm. The location of the subject site benefits from the nearby Bluebell Luas stop, c. 150 metres east of the site along Naas Road. The sheer quantum of cycle spaces provided for students and visitors of the proposed development will encourage students to cycle to nearby facilities. Due to the proximity of the subject site to an abundance of facilities, students will also be encouraged to walk to destinations. These measures adhere to the 15-minute city vision set out in this Policy. **Phasing:** Given the nature of the development, it will be delivered in a single phase. **Access and Permeability:**

			Access and Permeability: Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS. **Height:** Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density. **Urban Greening and Biodiversity:** Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances. **Surface Water Management**: All development proposals should provide for sustainable surface water	Pedestrian access throughout the site has been a main priority during the design stage of this scheme. A minimum of 1.8-metre-wide footpaths are provided to ensure there is sufficient space for people to pass each other. To aid visually impaired people with navigation throughout the site, blister tactile paving strips have been provided in line with the principles of DMURS at the interfaces between a pedestrian-only area and a shared surface with vehicles. Planters have been configured and located in a way to create visual links between outdoor and indoor spaces. Ground cover planting, specified in the *Landscape Design Report* by Stephen Diamond Associates, grows to an approximate height of 1 metre to ensure that visibility across the site is not hindered for people to passively survey the site. The controlled and uncontrolled crossings proposed along Naas Road will also increase access and permeability for the site as pedestrians can safely and easily cross the Naas Road when entering / exiting the site. **Height:** Please refer to the Townscape Impact Assessment, the Architectural Design Statement and Section 8.3.5.2 of this Planning Report and Statement of Consistency. **Urban Greening and Biodiversity:** The proposed development proposes to use a variety of green infrastructure and SuDS measures. Intensive and extensive green and blue roofs will be provided throughout the development providing a significant volume of water storage on the roofs of each block. Swale or bioretention type features will be provided at ground level.

			management including climate change provisions and the installation of sustainable drainage systems (SuDS) in order to reduce surface water runoff and potential flooding. This should be considered in conjunction with open space design and green infrastructure, biodiversity initiatives and nature based solutions. See Appendix 11, 12 and 13 for further detail. **Flood Risk:** All development proposals within the SDRA's will have regard to restrictions / measures to mitigate identified flood risk outlined in the Strategic Flood Risk Assessment (SFRA) and in particular, Appendices A, B and C including climate change provisions in the SFRA. **River Restoration:** Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible: SDRA 1 Clongriffin/Belmayne and Environs; SDRA 3 Finglas Village Environs and Jamestown Lands; SDRA 4 Park West/Cherry Orchard; SDRA 5 Naas Road; SDRA 6 Docklands; SDRA 7 Heuston and Environs; SDRA 9 Emmet Road; SDRA 10 North East Inner City and SDRA 16 Oscar Traynor Road. See Chapter 9, Policy SI12 for further detail. **Sustainable Energy:** Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to	The daylighting of the River Camac will introduce new greenspace, tree planting and biodiversity to the subject site. The river, in its current state, is underground and unexposed, therefore a key element of the proposed development is to open up the river to introduce more green infrastructure and biodiversity to the area. The daylighting of the River Camac will provide 1,261 sq m of open space (13% of the site area) on the subject site, providing visual amenity and biodiversity net gain. Due to the future protection of the flora and fauna created, the space is not included as useable public open space. The development will see the addition of open spaces on a site that is predominantly hard standing in its current state. Public and private open spaces will include numerous tree planting and green pockets spread throughout the development to create a visually attractive environment. The public open space provided is in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway above the Riparian Zone, equating to 3,000 sq m in total or 31% of the total site area. **Surface Water Management**: A detailed surface water management plan has been prepared for the development. It is proposed to use a variety of green infrastructure and SuDS measures to act as natural surface water management and flood risk mitigation measures. The provision of intensive and extensive green and blue roofs will provide a significant volume of water storage on the roofs of the development, while also slowing the rate at which water will discharge to the main drainage system. Similarly, the provision of swale or bioretention type areas and permeable paving at ground level will provide some natural areas for flood water retention. The

			investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network. Further specific guidance regarding 'District Heating Enabled' Development is set out in Chapter 15 and should be complied with. Specific guidance is set out regarding SDRA 6 (Docklands) and SDRA 10 (NEIC) where applicants must demonstrate how a proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. Guidance is also set out regarding SDRA 7 (Heuston and Environs), SDRA 8 (Grangegorman/Broadstone), SDRA 11 (St. Teresa's Garden and Environs), SDRA 14 (St. James's Healthcare Campus and Environs), SDRA 15 (Liberties and Newmarket Square) where possible connections or interconnections to existing heat networks in the area, to create a district heating 'node' must be investigated. **Climate Change:** Proposed developments within the SDRA shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments. **Cultural Infrastructure:** All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development. See Objective CUO25 for further detail.	provision of the riparian corridor along the sides of the daylighted River Camac will also improve the flood resilience of the proposed development. **Flood Risk:** The measures outlined in the *Site Specific Flood Risk Assessment*, and in particular in appendices A, B and C have been taken into account during the development of the proposals. As the River Camac is currently culverted well below ground, it does not pose a flood risk to the existing site. The provision of the riparian corridor as part of the daylighting proposal for the culvert will form a natural flood plain, so it is not considered that the flood risk will increase as a result. Appendix A of the *Flood Risk Assessment Report* makes reference to the River Camac, and noted that a study is underway over the whole of the catchment to provide flood defences up to the estimated 1% AEP fluvial and 0.5% AEP tidal flood events. The *Site Specific Flood Risk Assessment* demonstrates that the proposed development has a negligible risk of flooding associated with such events. In relation to Appendix B of the *Flood Risk Assessment Report*, and in particular area 19 which covers the area of the proposed development, the discussion primarily relates to areas outside the extent of the culvert. As noted above, the *Site Specific Flood Risk Assessment* has demonstrated that the proposed development is at a negligible risk from extreme flood events. In terms of Appendix C, the document concludes that the Naas Road area is all classified as Flood Zone C, noting that the Justification Test is not required.

				River Restoration: The subject scheme proposes river restoration in conjunction with this policy. The daylighting of the river Camac is proposed to enhance, regenerate and re-establish the river corridor, improve the quality of water and create habitats. **Sustainable Energy** and **Climate Change:** A *Climate Action, Energy and Sustainability Statement,* prepared by Delap & Waller submitted herewith, details the strategy to address the various climate mitigation actions in the built environment. The proposed development has been designed in line with the principles of the energy hierarchy, Be Lean, Be Clean &Be Green. This ensures the development prioritises passive measures which reduces carbon, balances high quality daylight while ensuring thermal comfort is maintained year-round via mixed mode ventilation and passive fabric specification. A feasibility study has been carried out to determine the most appropriate LZC/renewable energy system for the scheme, in line with NZEB and future Net Zero Carbon requirements. A desktop review has been carried out to assess the feasibility of connecting to an existing or future heat network in accordance with the heating hierarchy. The *Climate Action, Energy and Sustainability Statement* lists out the existing or proposed SDRAs which have proposed district heating networks along with their proximity to the development. The desktop study has outlined that there are no existing or currently proposed district heating networks within the vicinity of the subject site, with the closest future proposed network being within SDRA 14 St James' Healthcare Campus located 3.14km from the proposed development. Therefore, in accordance with the DCC document "*Dublin District Heating System Technical Information Pack for*

				Developers" the proposed energy strategy for Gowan house will be a decentralised energy strategy, compliant with Nearly Zero Energy Building standards, and be district heat enabled. **Cultural Infrastructure:** The subject site adheres to this policy by providing 5.78% cultural and community space. Out of the 1,553 sq m of cultural and community space proposed, 729 sq m is dedicated cultural space and 312 sq m is dedicated shared cultural and community space. The cultural space will principally comprise a digital hub, and ancillary and storage space. Digital hubs are spaces for people to gather and work together on projects, providing a shared unit that promotes teamwork, innovation and creativity. In this location where there will be a student population and having regard to the proximity to the Ballyfermot College, which specialises in media, it is envisaged that the digital hub space will be utilised for podcasts, YouTube studio space, gallery space, kitchen, photography studios, makerspace and general shared working for creatives. The shared cultural and community space will comprise a shared reception and accessible breakout space.
Chapter 14 – Land Use Zoning	Please refer to the Planning Report			
Chapter 15 – Development Standards	15.3.1		To facilitate the proper assessment of a development proposal in circumstances where it is considered that a proposed development would be likely to have a significant effect on the environment, due to the nature, scale or location of the proposal, Dublin City Council will require the submission of an Environmental Impact Statement in accordance with the provisions of the Planning and Development Regulations 2001, as amended.	A suite of Environmental Reports has been prepared and are submitted with this planning application.

	15.3.2		All applications will be screened for AA by the competent authority (Dublin City Council) as part of the planning process. Applicants are however, required to carry out a screening statement and subsequent Stage 2 assessment (if necessary) for inclusion with the planning application.	Enviroguide Consulting have prepared an *Appropriate Assessment Screening Report* to accompany this planning application. A Stage 2 assessment was not deemed necessary.
	15.3.3		An Ecological Impact Assessment should be carried out for all developments within or adjacent to any sensitive habitat, ecological corridor, specific landscape character area or which has the potential to contain protected habitats or species.	An *ECIA* which has been prepared by Enviroguide Consulting is submitted with this application.
	15.4.1		Healthy Placemaking All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities, which are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city as set out in Chapters 4 and 5. The provision of active recreation and sports facilities in new neighbourhoods and public spaces will be supported as well as greening measures including the use of nature based water retention infrastructure in the public realm (see policy GI27, objective GIO5). Key principles to consider are: • The contribution to the public realm for the benefit and / or enjoyment of the locality. • The ability to create a sense of place and community using existing site features, tree	Healthy placemaking principles have been embedded into the design of the proposed development. The proposed development will result in the redevelopment and regeneration of a key underutilised site, thereby enhancing the public realm and healthy placemaking through the creation of a more attractive and desirable environment. The concept of the 15-minute city is highly relevant to the proposed development as the scheme has been designed to a high standard, incorporating a sense of healthy placemaking through the provision of accessible, safe and inclusive spaces. The below provides a response to each of the key principles to consider. • The existing site does not provide any form of public open space. The proposed development will provide a total of 4,261 sq m of both useable and visual open space. The riparian zone accounts for 1,261 sq m of the open space (13% of the total site area) which does not count towards useable public open space, however, it does provide visual interest and biodiversity net gain. The 3,000 sq m of public open space makes up 31% of the total site area and is provided in the form of a Central Plaza, Connection Plaza,

			coverage and landscaping to support green infrastructure and healthy streets. • The use of high quality materials and finishes including hard and soft landscaping. • The orientation of open space and the accessibility to daylight and sunlight. • Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets. • The accessibility of the development and the traffic calming measures in place in accordance with DMURS. • The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc. Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.	Green Route Boulevard, and an Elevated Walkway above the riparian zone. • The existing site provides little in terms of biodiversity and green infrastructure. The provision of extensive tree planting, shrubs and soft landscaping will significantly improve the greening of the subject site. • The building materials proposed are reflective of the need to break down the mass of the buildings through the modulation of the buildings and 'stepping down' approach to the various levels. The modulation effect breaks up larger elements of the building by providing different materials and textures. Different colour tones on the panels are to be used to add variety and visual interest. In addition to the proposed building materials, both hard and soft landscaping is proposed, with a focus on increasing the green infrastructure on site. The aim of the soft landscaping proposed is to recreate a sense of Irish native landscape through the use of native species. • The orientation of the both the public open space and student amenity space is so that they receive high levels of daylight and sunlight. • The proposed development will deliver the highest quality and well-designed public realm and student amenity space. The public realm and green infrastructure will create linkages and connection and will enhance accessibility. The beautifully landscaped riparian zone surrounding the daylighted River Camac will attract people to the site, as this is an experience not many people encounter. It is also proposed to improve permeability through the site by connecting the subject site with the Carriglea site to the south. The Connection Plaza has been designed as a pedestrian priority shared surface, ensuring there is a smooth transitional link between the riparian

				zone at the subject site and the linear park at the Carriglea site. The proposed student amenity space will mainly be provided internally in order to maintain the quantum of public open space proposed. The communal amenity space will provide hubs, a game room and karaoke lounge for students to hangout and socialise with one another, while the library and breakout space will provide a quiet space for students to study outside their bedroom. A gym is also provided to promote a healthy lifestyle amongst students. The roof gardens will benefit from large green spaces and benches, providing a place that is visually attractive for students to socialise with one another, or somewhere for them to relax by themselves. The outdoor terrace at basement level will be used as an outdoor exercise area in which students can bring an exercise matt outside and stretch, do yoga, meditate, free weight exercises or bring out various weights from the gym. The external communal space at ground floor level will provide a dedicated study space for students to get some fresh air whilst studying or writing any assignments. • A *DMURS Compliance Report* prepared by Barrett Mahony Consulting Engineers provides details of how the proposed development complies with DMURS, concluding that the "*design proposals reflect a robust integrated design approach that seeks to deliver safe, convenient and attractive street networks which promote a sustainable community environment.*". • The proposed development will include a total of 941 No. cycle parking spaces for students of the accommodation, located in a dedicated cycle store in Block 1. There are 218 No. visitor bicycle parking spaces throughout the development in the form of Sheffield-style bicycle stands, primarily located near doorways. There is 1 No. space

				provided internally via a vertical cycle stand for the retail unit and 2 No. vertical cycle stands for the cultural and community space which will be dedicated to staff. It is envisaged that students, staff and visitors will choose to cycle to and from the site due to the multitude of parking spaces provided. The provision of inbound and outbound cycle lanes from the development entrance to the Naas Road seeks to ensure the safety of cyclists is secured.
	15.4.2		*Architectural Design Quality* Imaginative, innovative and contemporary architecture is encouraged in all development proposals, provided that it respects Dublin's heritage and local distinctiveness and enriches the city environment. Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance. Through the use of high quality materials and finishes and the appropriate building form, the architectural quality of development should positively contribute to the urban design and streetscape, enhancing the overall quality of the urban environment. In particular, development should respond creatively to and respect and enhance its context. The urban form and layout of a development can influence a range of factors including microclimatic impacts and visual impacts. In this regard, the layout,	The proposed development is of a high architectural design quality and has a character that relates to the existing context. See Masterplan & Architectural Design Statement for details. With regard to Microclimate and Wind in particular, please see enclosed a Report entitled *Microclimatic Wind Analysis and Pedestrian Comfort Report* prepared by IN2 which demonstrates that the current design creates no adverse wind affects at the subject site. The analysis illustrated how conditions for pedestrians at all assessed outdoor amenity spaces were determined to have comfortable wind conditions for suitable for "Outdoor Dining" or "Pedestrian Sitting/ Standing" with no adverse wind affects predicted to occur. Overall, the proposed development was determined to not negatively impact on its receiving environment in terms of wind microclimate.

			position and composition of buildings on a site should be considered. The layout of a development should be designed to be attractive to all users, particularly pedestrians, cyclists, people with disabilities and the elderly. Key principles to consider are: • The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site. • The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of existing rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines. The scale and pattern of existing streets, squares, lanes and spaces should be considered. • The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting. • The suitability of the proposed design to its intended landuse and the wider land-use character of the area, along with its relationship with and contribution to the public realm. • The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River Liffey and many quality open spaces that contribute positively to the cityscape and urban realm, the settings of protected structures, areas of special	

			interest and important views and that the design incorporates high quality detail, materials and craftsmanship. • The need to protect and enhance natural features of the site, including trees and any landscape setting. • The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling. • The main routes which should be distinguished by exploiting vistas, key buildings and landmarks with the activities and functions of the places made visible, thus bringing a sense of liveliness to spaces. Landmark features which can be used to give treatment to main entrances to a development, complement open spaces and assist in place-making and identity.	
	15.4.3		*Sustainability and Climate Action* Good design has a key role to play in both reducing waste and emissions which contribute to climate change. These issues must be considered from the outset of the design process. Development proposals will be expected to minimise energy use and emissions that contribute to climate change during the lifecycle of the development with an aspiration towards zero carbon, and ensure the reduction, re-use or recycling of resources and materials, including water, waste and aggregates. To minimise the waste embodied energy in existing structures, the re-use of existing buildings	The proposed development embeds sustainability design principles. A *Climate Action, Energy and Sustainability Statement,* prepared by Delap & Waller submitted herewith, details the strategy to address the various climate mitigation actions in the built environment. The proposed development has been designed in line with the principles of the energy hierarchy, Be Lean, Be Clean &Be Green. This ensures the development prioritises passive measures which reduces carbon, balances high quality daylight while ensuring thermal comfort is maintained year-round via mixed mode ventilation and passive fabric specification.

			should always be considered as a first option in preference to demolition and new build. See Section 15.7 for further details on energy requirements. Key sustainable design principles to consider are (See also Section 15.6 on Green Infrastructure): • Buildings should be designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies. • Design should optimise natural or heat recovery ventilation, minimise overshadowing and minimise glare and excessive solar gain. • Materials should be selected which are sustainably sourced and existing materials re-used and recycled wherever possible. The use of green building materials and low embodied energy products such as low carbon cement and recycled materials is encouraged. • Design should enhance biodiversity and provide for accessible open space and landscaping which enhances the ecological value of a site. Greening measures should be included such as the incorporation of green roofs and walls, planting and trees. See also policies as detailed in Chapter 10. • Developments should incorporate a Surface Water Management Plan in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance – see policy SI25.	A feasibility study has been carried out to determine the most appropriate LZC/renewable energy system for the scheme, in line with NZEB and future Net Zero Carbon requirements. Construction materials used will be sourced from manufacturers with EPBD certification, encouraging the use of materials with high percentage of recycled content. The development aims to achieve the recommended Whole Life Cycle Carbon levels outlined in RIBA. A desktop review has been carried out to assess the feasibility of connecting to an existing or future heat network in accordance with the heating hierarchy. The *Climate Action, Energy & Sustainability Statement* lists out the existing or proposed SDRAs which have proposed district heating networks along with their proximity to the development. The desktop study has outlined that there are no existing or currently proposed district heating networks within the vicinity of the proposed Gowan House development, with the closest future proposed network being within SDRA 14 St James' Healthcare Campus located 3.14km from the proposed development. Therefore, in accordance with the DCC document "*Dublin District Heating System Technical Information Pack for Developers*" the proposed energy strategy for Gowan house will be a decentralised energy strategy, compliant with Nearly Zero Energy Building standards, and be district heat enabled.

			• New public and private spaces must incorporate proposals for Sustainable Drainage Systems (SuDS) in their design, where appropriate, in accordance with the Council's Guidance Document for implementing SuDS Solutions (2021). See also Appendix 12 and policy SI22 and SI23. • For larger schemes, consideration should be given to district heating schemes and combined heat and power (CHP) – see policy CA11, CA15, CA16, CA17, CA18 and Section 15.7.2 below.	
	15.4.4		*Inclusivity and Accessibility* An inclusive environment is one which values diversity and difference and encompasses the needs of a wide range of user groups, as well as being sufficiently flexible and versatile to be able to adapt to diverse and changing needs and life circumstances. Development proposals, including all new large scale developments, whether they relate to new buildings, public realm works, changes of use or alterations to existing buildings, must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities. Within new buildings and spaces, this will include consideration of issues such as provision of level circulation, lifts, doors widths, surface finishes, signs and information. The needs of occupants of different ages and stages of life should also be considered, ensuring form, construction and internal arrangement of the building will enable future adaptability. Access	Out of the total 941 No. student bedspaces proposed, there are 47 No. accessible studios, equating to 5% of the total proposed. To ensure safe and easy access for people availing of the accessible studios, the location of the studios are adjacent to the circulation core for easy access. Sufficient provision for disabled users is provided in all circulation spaces, communal areas and bin stores. Bike stores are equipped with accessible ramps and 5 No. Cargo bike spaces which can be used for oversized bikes. The proposed student amenity space provides accessible bathrooms. Appropriate finishes will be provided to ease the movement through the building.

			to the environment should also consider ways in which services and information can be provided to meet the needs of all users. All public buildings should ensure appropriate Development Standards | Chapter 15 562 disability access, including disability car parking where feasible. The Council will support the retrofitting of public buildings where appropriate to ensure optimal accessibility. The historic environment poses particular challenges for fully delivering all-inclusive access, however, there will almost always be scope to improve access for all without compromising the character of an existing structure of special interest – detailed advice is provided in the Architectural Heritage Protection Guidelines for Planning Authorities re-issued by the Department of Arts, Heritage and the Gaeltacht (DAHG) in 2011. Access to the environment in this context, may not just be about physical access, but should also consider the ways in which services and information can be provided to meet the needs of all users. See also Section 15.15.2.5 and 15.15.2.6. • Dublin City Council will have regard to the Universal Design Guidelines for Homes in Ireland issued by the National Disability Authority and Housing Options for our Ageing Population, issued by the Department of Housing, Local Government and Heritage and the Department of Health, the National Disability Authority's Building For Everyone: A Universal Design Approach 2012 and will seek to encourage the implementation of best practice standards with regard to access in relation	

			to both indoor and outdoor environments. Part M of the Building Regulations sets out standards to ensure that buildings are accessible and usable by everyone, including the aged, people with disabilities and people with children. The Technical Guidance Document in relation to Part M provides guidance on the access requirements for public buildings and for residential dwellings. Volume 2 of the Development Plan, under Appendix 5 Transport and Mobility: Technical Requirements, provides a list of requirements for retail and commercial planning applications.	
	15.4.5		*Safe and Secure Design* The relationship between buildings and their adjoining spaces strongly influences the sense of personal safety and design plays a key role in ensuring that spaces are well designed and have appropriate passive surveillance. All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007). New developments and refurbishments should be designed to promote safety and security and avoid anti-social behaviour by: • Maximising passive surveillance of streets, open spaces, play areas and surface parking. • Avoiding the creation of blank facades, dark or secluded areas or enclosed public areas. • Eliminating leftover pockets of land with no clear purpose.	The proposed development is designed with safety and security guidance and best practice. Please see the Community Safety Strategy in the Architectural Design Statement for details.

			• Providing adequate lighting. • Providing a clear distinction between private and communal or public open space, including robust boundary treatment. • Enabling residents to watch over the entrance to their home; recessed entrances should be avoided and front doors should also be overlooked from other houses or from well-trafficked public areas. • Locating back gardens next to other back gardens or secure private areas rather than on to roadways or other public areas. • Ensuring that the layout and design of roads within residential areas encourages appropriate traffic volumes and speeds. • Providing clear and direct routes through the area for pedestrians and cyclists with safe edge treatment, maintaining clear sight lines at eye level and clear visibility of the route ahead. • Using materials in public areas which are sufficiently robust to discourage vandalism. • Avoiding the planting of fast-growing shrubs and trees where they would obscure lighting or pedestrian routes; shrubs should be set back from the edge of paths. • Consulting with An Garda Síochána crime prevention design advisor where appropriate; Dublin City Council will also have regard to the Guidelines on Joint Policing Committees as established under the Garda Síochána Act 2005 as amended (2014), in order to ensure safe and secure communities.	

			• On housing developments over 100 units, the Council will require the submission of a Community Safety Strategy (see objective QHSNO15) which would set out the design features incorporated to address the above measures to ensure a high level of safety and security is maintained including, overlooking, passive surveillance, street lighting and clear accessible routes.	
	15.5.1		*Brownfield, Regeneration Sites and Large Scale Development* Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale, regeneration and brownfield development: • To encourage innovative, high quality urban design and architectural detail in all new development proposals. • To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area. • To respect and enhance existing natural features of interest. • To contribute to the streetscape creating active and vibrant public realm. • To create animation and create activity at street level and vertically throughout the building. • To provide for appropriate materials and finishes in the context of the surrounding buildings. • To ensure land contamination is appropriately dealt with and mitigated against.	The proposed development is a large-scale development and has been designed to incorporate the measures set out in Section 15.5.1 as set out throughout the application documentation especially the *Architectural Design Statement*. In summary, the scheme • Has a high quality architectural design; • Enhances the natural feature of interest through the daylighting of the river; • Creates a new streetscape along the Naas Road along with public open spaces that will define the new street edge; • Proposes active uses at lower ground and ground floor through the provision of 1,553 sq m of cultural and community space principally comprising a digital hub, co-working area and a café; • Proposes new liner spaces connecting to Carriglea behind which in turn connects through to Slievebloom Park; • Includes a mix of uses such as retail, a digital hub, co-working area, a café, and student accommodation comprising student amenity space of various uses; and • Will ensure that the limited volume of contaminated material will be mitigated in accordance with the EPA requirements.

			• To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network. • To create new compositions and points of interest. • To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area. • To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site. • To prioritise pedestrian and cycle movements in connection with public transport infrastructure. • To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes. • To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks. • Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.	
	15.5.2		Infill Development Infill development should complement the existing streetscape, providing for a new urban design quality to the area. It is particularly important that proposed infill development respects and enhances its context	The subject scheme draws its starting point from consideration of the heights permitted in the adjacent Carriglea and Concorde sites. The site is located towards the Eastern end of the Naas Road district of the City Edge Framework. This area is currently

			and is well integrated with its surroundings, ensuring a more coherent cityscape. As such Dublin City Council will require infill development: • To respect and complement the prevailing scale, mass and architectural design in the surrounding townscape. • To demonstrate a positive response to the existing context, including characteristic building plot widths, architectural form and the materials and detailing of existing buildings, where these contribute positively to the character and appearance of the area. • Within terraces or groups of buildings of unified design and significant quality, infill development will positively interpret the existing design and architectural features where these make a positive contribution to the area. • In areas of low quality, varied townscape, infill development will have sufficient independence of form and design to create new compositions and points of interest.	predominated by light industrial and retail park, and has been identified in the framework for mixed use and residential development, with future uses for the district identified as finance, business and professional, information & communications / tech, research & development, institutional use / higher education, public sector and urban workspace. The proposed scheme relates to the surrounding townscape, both to the scheme currently being built on the Carriglea site to the south, and the emerging scheme of Concorde site to the west. The scheme gradually steps up in height from the Carriglea site becoming higher towards Naas Road, and the shoulder height of the scheme is directly relatable to the shoulder height of Concorde along Naas Road. As illustrated in the design statement, although the proposed scheme presents a 10 No. storey shoulder height along the Naas Road, this is comparable to the 9 No. storeys of the Concorde scheme due to the reduced floor to floor height achievable on PBSA schemes in comparison to those typically achieved on residential/apartment schemes (2.7m vs circa 3.15m). There are currently no planning proposals for the site located directly east of this application site, however, the design team believes that the current proposal does not impact the future development of the neighbouring site. The proposals makes numerous positive contributions to emerging context, including high quality architectural design commensurate to the neighbouring schemes and policy aspirations, creation of a high quality public realm including a new public square, new connections through the site linking the Bluebell Luas stop to the south of the site, introduction of vibrant active frontage to the new public realm including

				retail/community/cultural uses, and a significant improvement to the blue infrastructure and biodiversity of the masterplan with the opening up of the River Camac culvert and the introduction of a carefully considered riparian zone.
	15.5.5		*Density* Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 guidelines which seek to consolidate development within existing urban areas. Higher density development allows land to be used more efficiently, assists in regeneration and minimises urban expansion. Higher densities maintain the vitality and viability of local services and provide for the critical mass for successful functionality of public transport facilities. New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity. An urban design and quality-led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban villages and neighbourhoods. • All proposals for higher densities must demonstrate how the proposal contributes to place-making and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of	Due to the nature of the proposed development providing student bedspaces rather than residential apartments, the prescribed density ranges identified in Table 1 does not apply. Nonetheless, it is considered the proposed high-density scheme of 941 No. student bedspaces at a c. 0.962 Ha site is appropriate given the location of the subject site in a strategic regeneration area and in proximity to high-quality and high-frequency public transport as well as the unequivocal need to provide much needed student bedspaces in Dublin. The rationale for the proposed plot ratio of 3.2 is provided in the following row. The principle of part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 11 No. storeys (above basement level) for Block 2 as part of the redevelopment of the subject site has been addressed in Section 8.3.5 of this Report which responds to each performance criteria set out in Table 3 of Appendix 3 of the *Development Plan.*

			sustainable neighbourhoods. Refer to Appendix 3 for further details.	
	15.5.7		*Materials and Finishes* Materials and finishes should be selected to ensure longevity throughout the lifetime of the development. All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application. As such, Dublin City Council will require developments: • To ensure materials and finishes complement the existing pallet of materials in the surrounding area. • Promote durability to ensure a good visual appearance over time. • The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of anti-social activity. • To support the use of structural materials that have low to zero embodied energy and CO_2 emissions as well as the use of sustainably sourced building materials and the reuse of demolition and excavated materials.	The materials and finishes are selected to ensure longevity for the lifetime of the development. See Architectural Design Statement for details. Please refer to Policy SC19 & Policy SC21 for further response.

	15.5.8		*Architectural Design Statements* Applications for 50+ residential units should be accompanied by an Architectural Design Statement or any application below the threshold where the planning authority consider it necessary. Statements may also be required for large scale commercial development. An Architectural Design Statement is an informative, illustrative document that clearly describes the development proposal, the context in which the development is set and the design rationale for the scheme. Design statements should analyse the site context, planning context, opportunities and constraints of the site and the conceptual and detailed design of the development including the building massing, material and finishes and building articulation, (see also Policy SC23). Design Statements should include the following information as set out in the table below which build upon the detail of the key design parameters. Architect to review Table 15-2.	A Masterplan & Architectural Design Statement is included in the application.
	15.5.9		*Models and Photomontages* In the case of certain large or complex planning proposals, models and photomontages of a proposed scheme to an appropriate scale will be required by the planning authority. All photo-montages submitted with a planning application or Environmental Impact Statement must include details of the type of camera and the lens used to create the image. The development should be clearly depicted. The inclusion of excessive sunshine, blue sky and any other detailing	The scheme has been modelled by HKR Architects and CGIs and photomontages have been prepared by 3D Design Bureau.

			or colouring which may distort the reliability of the photomontages should be avoided.	
	15.6		*Green Infrastructure and Landscaping* Planning applications will be required to address climate action as part of the overall design of the development and incorporate green infrastructure techniques. All new developments in the city are encouraged to incorporate an ecosystem services approach as a key instrument in achieving sustainable climate change action in accordance with Policy GI5 and GI6. The proposal should indicate how existing natural features of the site will inform sustainable urban form and should include the following: • Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design. • The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city's green infrastructure in this development	Given the hardstanding nature of the site currently, with little green infrastructure existing, the proposed landscape measures will unequivocally bring life to the site. The proposed landscape has been designed collaboratively from the offset as an integral element of the proposal. A mixture of hard and soft landscape materials is proposed throughout the subject site, promoting a wide range of flora and fauna, providing a safe and usable space for pedestrians, cyclists, and motorists, as well as the use of permeable materials for rainwater management. There will be a range of planting used throughout the development, such as trees, ornamental grasses, flowering, and shrubs. The soft landscaping provides a counterpoint to the hard landscaping and built elements, and introduces new colours, smells and biodiversity to the site. The Riparian Zone acts as the green heart from which the flora and fauna emerges and spills out to the entire site. The proposed development will provide a green link to the Carriglea scheme to the south, contributing to the provision of a green link along the Camac River and providing permeable access from Naas Road to Lansdowne Gate / Slievebloom Park located beyond the Carriglea site.

			plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and 'stepping stones' to ensure biodiversity protection. Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council's Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.	
	15.6.2		*Surface Water Management and SuDs* All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council's Surface Water Management Guidance (see Appendix 13.) • All new developments will also be required to utilise SuDS measures in accordance with Policy SI22 of the development plan. The SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer. Appendix 12 sets out further detail regarding SuDS and should be consulted by all applicants.	Surface Water Management for the development is incorporated into the *Civil Engineering Infrastructure and Surface Water Management Report* by Barrett Mahony Consulting Engineers. The proposed SUDS measures are outlined in Section 2 of the report, along with the relevant Barrett Mahony drainage drawings.

	15.6.3		Green / Blue Roofs • Dublin City Council will require all new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23. Refer to Appendix 11 for further details.	Green and blue roofs are provided for within the development. Please refer to Barrett Mahony Consulting Engineers *Civil Engineering Infrastructure & Surface Water Management Report* and relevant drawings. Both extensive and intensive green roofs are being provided, and the combined provision exceeds DCC's minimum coverage of 70% / 50 %. Altogether there are eight extensive green rooftops at Block 1 & 2 that are covered with sedum-type planting. A further two intensively planted green roofs located at nineth and tenth floor level have a minimum of 400 mm topsoil locally mounded to a minimum of 800 mm for small tree planting. The intensively planted roofs are planted with a native-approved meadow mix which is filled with species of plants that will attract various pollinators. Several felled logs are proposed to be placed within the roof garden at nineth and tenth floor level with a maximum of 300 mm diameter and 3.5m length with branches less than 100 mm diameter removed. The log will gradually decompose over time and provide a habitat for tiny insects.
	15.6.5		*Urban Greening* All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc. The provision of urban greening methods improves the overall quality of the environment and enhances the well-being in accordance with policy CA29 and GI16.	The daylighting of the River Camac will introduce new greenspace, tree planting and biodiversity to the subject site. The river, in its current state, is underground and unexposed, therefore a key element of the proposed development is to open up the river to introduce more green infrastructure and biodiversity to the area. The daylighting of the River Camac will provide 1,261 sq m of open space (13% of the site area) on the subject site, providing visual amenity and biodiversity net gain. Due to the future protection of the flora and fauna created, the space is not included as useable public open space.

				The development will see the addition of open spaces on a site that is predominantly hard standing in its current state. Public and private open spaces will include numerous tree planting and green pockets spread throughout the development to create a visually attractive environment. The public open space provided is in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway above the Riparian Zone, equating to 3,000 sq m in total or 31% of the total site area.
	15.6.6		*Sensitive Ecological Areas* Sensitive ecological areas can include protected areas such as SPA's, SAC's and NHA's as well as areas with significant tree cover and vegetation capable of facilitating habitats, or any other landscaped area with quality natural environment or sensitive natural features. Regard to such areas must be made in any development proposal. Where a proposed development adjoins a sensitive ecological area such as a river or canal bank, the area adjacent to the waterway should be retained as a riparian corridor with linkages into the wider open space network. The maintenance of natural river banks shall be required, without physical or visual encroachment on watercourses. See also policy SI10. The width of any linear park adjacent to a waterway should take into account the natural topography, existing layout and amenity potential with due allowance for riparian corridors and flood risk. In all cases, any existing blockages to permeability, such as boundaries or redundant buildings, should be resolved	The proposed development seeks to daylight the currently culverted River Camac running through the site. The daylighting of the river will facilitate new greening along the riparian zone which in turn will produce new biodiversity. Please see the *Landscape Design Report* produced by Stephen Diamond Associates, the *Ecological Impact Assessment* and *Biodiversity Enhancement Plan* prepared by Enviroguide Consulting for further details of the ecological benefits of the daylighting of the River Camac. As requested by the Parks Department, the riparian zone, located mostly some 10 No. metres below ground floor level, is inaccessible for members of the public and student residents, with access only permitted for maintenance purposes. This is to protect the new flora and fauna produced as a result of daylighting the River Camac as well as the newly exposed water body. Nevertheless, the riparian zone will provide visual amenity to both the student population and members of the public through proposed terraces and an elevated walkway. According to the *Hydromorphological Qualitative Technical Assessment* (HQTA) prepared by AWN Consulting, as a result

			where possible. See Chapter 9, Section 9.5.2 and also policies SI10, SI11 and SI12, and objectives SIO7 and SIO8 on River Restoration. Full public access to lands along waterways which are in private ownership as part of any development proposal should be provided unless exceptional circumstances prevail. All of the main rivers in Dublin city have salmonid populations. Therefore, applicants should also demonstrate legal compliance to protect the watercourses and fisheries from soil, silt or other material during construction and in this regard should liaise with Inland Fisheries Ireland. As many protected species inhabit Dublin's rivers, applicants should consult with the National Parks and Wildlife Service to inquire as to any consent procedures required for proposed works and to ensure that design layouts do not cause habitat loss. In the case of proposals adjacent to a canal, appropriate space should be retained for wildlife and it should also be ensured that wildlife have appropriate access to the water. Applicants should consult the Dublin City Council Biodiversity Action Plan 2021-2025 and the Dublin City Canals Plan (Waterways Ireland in conjunction with Dublin City Council, Fáilte Ireland and the Dublin Docklands Development Authority) to ascertain the implications of these plans for any such site. Regard should also be had to Planning for Watercourses in the Urban Environment Guidance (2020) produced by Inland Fisheries Ireland.	of the proposed daylighting of the Camac River, the hydromorphological condition will be significantly improved from 'Poor' to 'Good', as established in the River Hydromorphology Assessment Technique (RHAT) guidelines at the specific site location (refer to the AWN report for further details). Overall, the potential effects on the WFD status to the waterbodies are considered to lead to beneficial effect, i.e., combined impacts have the potential to have a beneficial effect on the WFD element and improvement to the current status or elements in terms of the local hydromorphological environment and ecological status. The HQTA report also included a Hydraulic Analysis section that address the situation regarding sediment and erosion based on the HEC-RAS model prepared by BMCE. With regard to the proposed granite boulder size, there would be sufficient resistance to avoid the rock moving even for the 0.1% AEP event. The proposed 300mm thick gabion mattress would resist the extreme velocity projected for a 0.1% AEP event. With regard to sedimentation, according to the Hjulstrom-Sundborg diagram, the flow for the mean and dry weather condition (Q50 and Q95, respectively) would allow transport and deposition of different size of sediments for the mean and dry weather condition. The HQTA also analyse the River Restoration Corridor Principles developed by DCC under the WFD and how these will be met in the proposed development.

	15.6.7		*Landscape Design Rationale* Landscape design and maintenance plans will be regarded as an integral part of all development applications. The incorporation of landscape features to protect and support biodiversity and to ensure the existing landscaping and environments are protected will be required as part of all applications. Landscaping schemes must be in accordance with Dublin City Council standards for road and footpath layout, and there will be a preference for soft landscaping, where possible. Materials must be appropriate, durable and of a good quality. Careful consideration must be given to the design of hard-surfaced areas including streets, squares, open spaces, paved areas, footpaths and driveways. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design. Areas of schemes to be taken in charge by Dublin City should be designed with reference to the palette of materials used by the local authority to ensure later maintenance and replacement of materials in the upkeep of the area by the local authority. See also Appendix 5, Section 8.2 and 8.3. Applications for substantial hard-surfaced areas must demonstrate methods of controlling and limiting surface water run-off consistent with sustainable development (see also Appendix 12 and 13).	Proposed materials are indicated on the plans and in the *Landscape Design Statement* and *Masterplan & Architectural Design Statement*. As part of the application, a specification has been provided outlining maintenance regimes. For landscape maintenance, please see Section 7.1 of the submitted *Landscape Design Report* prepared by Stephen Diamond Associates.
	15.6.8		*Landscape Plans and Design Reports*	A *Landscape Design Statement* is included as part of the planning application and details the proposed public and communal open spaces, boundary treatments, public realm

			Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report. A Landscape Design Report sets out the landscape strategy for the scheme through the use of drawings, illustrations and species specification documents. A landscape report should describe the public open space and communal open space provided within a scheme to demonstrate compliance with the relevant guidelines. Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans. On sites with extensive vegetation and tree coverage, a separate tree report should also be incorporated into the landscape design report to support the retention of trees where possible. Landscape proposals should also take account of the biodiversity and environmental habitats present on the site and within the surrounding area and set out proposals to enhance and protect these features (see Sections 15.6.6, 15.6.9 and 15.6.10 for further details). Landscape design reports should address the following: • The protection and incorporation of existing trees and landscape features worthy of retention. • The contribution of the proposed development to the landscape character and setting and open space amenity of the area.	improvements, materials, and the tree and planting strategy. The report also sets out the strategy for supporting biodiversity and habitats.

			• The value of ecological corridors and habitats surrounding the proposed development and the potential impact on these areas. • The relationship between existing green corridors, public open spaces or area of high ecological values. • The detail and specifications for materials, finishes and maintenance details. • The integration of sustainable urban drainage systems such that landscaping plans may include associated biodiversity areas or wetlands which can reduce surface water run-off – see Appendix 12 and 13. • The hierarchy of different types of planting throughout the development in order to give visual variety. Green roofs, walls and permeable surfaces will be encouraged and required in certain instances (see Chapter 10 and Appendix 11). • The details of ecosystems services and biodiversity including pollinator friendly approach. • The maintenance and management strategy for the landscaped features.	
	15.6.9		*Trees and Hedgerows* Dublin City Council will seek to protect existing trees and hedgerows when granting planning permission for developments and will seek to ensure maximum retention, preservation and management of important trees, groups of trees, and hedges as set out in Section 10.5.7 of the plan.	There are no hedgerows on the existing site which is a hardstanding car park and warehouse/office building. A Tree Impacts Plan and a Tree Constraints Plan have been prepared by The Tree File and are enclosed separately.

			Dublin City Council will encourage and promote tree planting in the planning and design of private and public developments. New tree planting should be planned, designed, sourced, planted and managed in accordance with 'BS 8545:2014 Trees: from nursery to independence in the landscape – Recommendations'. New planting proposals should take account of the context within which a tree is to be planted and plant appropriate tree species for the location. A tree survey must be submitted where there are trees within a proposed planning application site, or on land adjacent to an application site that could influence or be affected by the development. Information will be required on which trees are to be retained and on the means of protecting these trees during construction works. Where development is proposed, it is essential that existing trees are considered from the very earliest stages of design and prior to an application for planning permission being submitted. Root systems, stems and canopies, with allowance for future movement and growth, need to be taken into account in all projects. The following criteria shall be taken into account by Dublin City Council in assessing planning applications on sites where there are significant individual trees or groups/ lines of trees, in order to inform decisions either to protect and integrate trees into the scheme, or to permit their removal: • Habitat/ecological value of the trees and their condition. • Uniqueness/rarity of species.	

			• Contribution to any historical setting/ conservation area. • Significance of the trees in framing or defining views. • Visual and amenity contribution to streetscape.	
	15.6.12		*Public Open Space and Recreation* Public open space should be of high quality landscaped design to provide for an amenity value. Public open space should utilise a combination of hard and soft landscaping to cater for a wide range of needs such as children's play, passive recreation and sporting facilities. Where adjacent to canals or rivers, proposals must take into account the functions of a riparian corridor and possible flood plain, see Section 10.5.5 Rivers and Canals and Section 9.5.2 on River Restoration. All applications which include areas of open space should refer to the Dublin City Council Parks Strategy 2017-2022 or any further iteration for guidance on the design and aspirations for city parks. Planning applications including any open space area (public or communal) should incorporate green infrastructure strategies including SuDs, flood management, biodiversity, outdoor recreation, connection and carbon absorption in accordance with Policy GI24 of the plan. See Section 10.5.4 and 15.8.6 for further details. In areas with a deficit of public open space in the city centre, SuDS proposals will be supported where it can	The scheme proposes a large quantum of public and communal open spaces combing hard and soft landscaping, passive recreation and fitness elements. The spaces have been designed in accordance with all relevant guidance. The scheme includes SuDs measures, biodiversity measures, outdoor recreation, connection and carbon absorption which ensures that a high-quality and sustainable development is provided. There will be 3,000 sq m of Public Open Space provided in the form of a Central Plaza, Connection Plaza, Green Route Boulevard, and an Elevated Walkway (above the Riparian Zone). The Riparian Zone creates 1,261 sq m of open space (13% of the site area) on the subject site, providing visual amenity and biodiversity net gain. Due to the future protection of the flora and fauna created, the space is not included as useable public open space as requested by the Parks Department of Dublin City Council. The Central Plaza marks the entrance to the subject site for members of the public as it fronts onto the Naas Road, allowing people to enter the space and escape the built-up and hardstanding nature of the Naas Road. This space will bring vibrancy and activity along Naas Road and will encourage people to make use of the other public open spaces on site. The main goal of the Connection Plaza is to connect the proposed development to the Carriglea Development directly

			be demonstrated that they have positive recreational and biodiversity functions. Any SuDS proposal that would negatively impinge on the conservation objectives of a historic park will not be supported. The planning authority will seek the provision of public open space in all residential schemes (see Section 15.8.6) and commercial developments in excess of 5,000 sq. m. Dublin City Council will seek the following in the delivery of public open space: • The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout. • Open space should be overlooked and designed to ensure passive surveillance is achieved. • The space should be visible from and accessible to the maximum number of users. • Inaccessible or narrow unusable spaces will not be accepted. • The level of daylight and sunlight received within the space shall be in accordance with the BRE guidelines or any other supplementary guidance document – see Appendix 16. • Any new public open space on the site should be contiguous to existing open space or natural feature (i.e. river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks. • Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.	to the south of the subject site. A smooth transitional link will be provided between the green space to the north of the Carrigelea site and the Riparian Zone on the subject site. The space is designed as a shared surface to facilitate pedestrian movements as the priority, but with occasional vehicle access to towards the east of the subject site. In order to slow down vehicles along this space, and re-enforce the idea of pedestrian priority, amorphous-shaped planters will be installed, which will also create an attractive environment. Located along the western boundary between Block 2 and No-Name Lane, the Green Route Boulevard will provide 2 No. social hubs where people have the opportunity to meet one another and socialise. The daylighting of the culverted River Camac will provide new green space and biodiversity to the subject site. Although the riverbed itself will not be accessible to students and the public, elevated walkways through the riparian vegetation will connect the Central Plaza with the Connection Plaza, and the green space in Carriglea to the south of the subject site. Not only will this space provide a link to the Carriglea site, it will also allow people to have a special close-up experience and direct connection with nature, while protecting the sensitive riparian environment below. The elevated walkways will be accessed at ground floor level and will be provided through cantilevered decks that project outwards from the edges of the Riparian Zone. For more information on the proposed public open space, please see Section 5.3.4 of this Report, Section 3.0 of the *Landscape Design Report* by Stephen Diamond Associates, and

			• Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity. • Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include associated biodiversity areas or wetlands which can reduce / better manage surface water run-off. • Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12). • Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design. • Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible. • Age friendly measures should be incorporated into the design. • Permeability and accessibility for all users, particularly disabled persons should be provided. • Cycle and pedestrian friendly routes should be accommodated.	page 30 of the *Architectural Design Statement* by HKR Architects.
	15.6.13		*Boundary Treatments* Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application. These shall include details in relation to	Boundary treatments are explained, and details are shown in the Landscape Section Drawings 22-579-SDA-PD-XX-203 to 22-579-SDA-PD-XX-209 as part of the planning application.

			proposed materials, finishes, and, in the case of planted boundaries, details in respect of species together with a planting schedule. In all instances, boundary treatments shall be of high quality, durable and attractive.	A permeable, welcoming open aspect approach is applied to the boundary treatments on the Gowan site. The only solid boundary treatment is retained to the north-west of the site. Indicative possible connections between planters and bicycle shelters are proposed along the boundary with Carriglea Development to create an open aspect and improve the connection for pedestrians between the two sites. The site is open along the No-Name-Lane to provide an attractive easily accessible south-facing public realm and to continue the Green Route depicted on the recently expired LAP along Naas Road. The site is open along Naas Road to welcome and invite people on site. Four into-ground planters with berms create a subtle protection to pedestrians without losing visual prospects in and out of the site.
	15.7		Climate Action • To mitigate against negative climatic impacts, all new developments will be required to demonstrate compliance with the climate action principles set out in Chapter 3 and as detailed below.	The scheme is in accordance with all relevant climate action principles as demonstrated in the *Climate Action, Energy & Sustainability Statement* prepared by Delap & Waller which is enclosed separately.
	15.7.2		*District Heating* District heating systems will be supported in areas identified in Chapter 3: Climate Action. In these areas, all applications should be designed to cater for district heating systems. The details of the heating system proposed and compatibility with the district heating network should be specified in all planning	A desktop review has been carried out to assess the feasibility of connecting to an existing or future heat network in accordance with the heating hierarchy. The *Climate Action, Energy and Sustainability Statement* prepared by Delap & Waller enclosed separately lists out the existing or proposed SDRAs which have proposed district heating networks along with their proximity to the development. The subject site is

			applications. Applicants are requested to submit a Climate Action and Energy Statement with all planning applications in this zone – see below. Where district heating systems are not yet in operation, the applicant is required to demonstrate how the proposed heating system of the development can connect and facilitate future use of the district heating system once in place, see policy CA15, CA16, CA17 and CA18 for further information.	located in the SDRA 5, where there is no existing or currently proposed infrastructure for district heating networks. The desktop study has outlined that there are no existing or currently proposed district heating networks within the vicinity of the proposed Gowan House development, with the closest future proposed network being within SDRA 14 St James' Healthcare Campus located 3.14km from the proposed development. Therefore, in accordance with the DCC document "*Dublin District Heating System Technical Information Pack for Developers*" the proposed energy strategy for Gowan house will be a decentralised energy strategy, compliant with Nearly Zero Energy Building standards, and be district heat enabled. This will ensure that the development complies with Part L 2022, nZEB, and DCC's Climate Action Policies upon completion. In the future, should a district heating network be proposed within a feasible proximity to the subject site, then the building can connect to this system.
	15.7.3		*Climate Action and Energy Statement* In order to comply with the policies set out in Section 3.5.2 'The Built Environment' and Section 3.5.3 'Energy' of Chapter 3, proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement. The purpose of this statement is to demonstrate how low carbon energy and heating solutions have been considered as part of the overall design and planning	A *Climate Action, Energy & Sustainability Report* prepared by Delap & Waller is enclosed with this planning application.

			of the proposed development. Having regard to the above, the statement, which shall be prepared by a certified engineer, shall address: • the technical, environmental and economic feasibility of on-site renewable energy generation including solar PV and small scale wind power; • the technical, environmental and economic feasibility of at a minimum, the following high-efficiency alternative energy supply and heating systems: • decentralised energy supply systems based on energy from renewable and waste heat sources; • co-generation (combined heat and power); • district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources; • heat pumps; • include an assessment of embodied energy impacts.	
	15.7.3.1		*'District Heating Enabled' Development* In addition to the requirements set out above, Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network.	The desktop study has outlined that there are no existing or currently proposed district heating networks within the vicinity of the subject site, with the closest future proposed network being within SDRA 14 St James' Healthcare Campus located 3.14km from the proposed development. Therefore, in accordance with the DCC document "*Dublin District Heating System Technical Information Pack for Developers*" the proposed energy strategy for Gowan house will be a decentralised energy strategy, compliant with Nearly Zero Energy Building standards, and be district heat enabled. This will ensure that the development complies with Part L 2022, nZEB, and DCC's Climate Action Policies upon completion. In

			Any such investigation should have regard to the heat demand density of the area in which the proposed development is located, as shown in the heat demand density map included as Figure 15.1 below. This map which was produced by Codema, and is included here for information purposes only, shows the overall heat demand density in each CSO electoral district in the Dublin City area. Where it is not feasible for a development to be district heat enabled, the statement must provide a clear explanation as to why this is would not be the case, and must also demonstrate that the proposed development offers a similarly efficient and low carbon energy and heating solution. For the avoidance of doubt, for a development to be 'District Heating Enabled', it should incorporate an efficient, low carbon building heat network, and/or a block communal heating network, in order to facilitate a future connection to a district heating network, without the need for significant additional retrofitting. To this end, 'District Heating Enabled' development should provide for: • an efficient, centralised, wet-based heat network within the building or within the area of the development as a whole (as appropriate); • the allocation of sufficient space in plant rooms to accommodate suitable district heating equipment, such as heat exchangers etc.; • the provision and safeguarding of suitable pipe routes throughout the building and complex;	the future, should a district heating network be proposed within a feasible proximity to the subject site, then the building can connect to this system.

			• the provision and safeguarding of suitable district heating network connection routes at and beyond the site boundary30. In addition to this overall requirement for SDRAs, additional requirements exist for significant development proposals in specific areas as follows: • SDRA 6 (Docklands) and 10 (North East Inner City): The Climate Action Energy Statement must demonstrate how the proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. • SDRA 7 (Heuston and Environs), SDRA 8 (Grangegorman/Broadstone) SDRA 11 (St. Teresa's Garden and Environs), SDRA12 (Dolphin House) SDRA 14 (St. James's Healthcare Campus and Environs SDRA 15 (Liberties and Newmarket Square): The Climate Action Energy Statement will be required to investigate possible connections or interconnections to existing heat networks in these areas, to ultimately create a district heating 'node'. Where a proposed development will be 'District Heating Enabled', the Climate Action Energy Statement will provide the information requested in the following table:	

			Table 15-3: Information Requirements for District Heating Enabled Developments **Heat Demand Information** Required Peak Heat Demand (kW) Estimated Annual Heat Consumption (MWh pa) Estimated Seasonal Base Load (kW) Gross Floor Area m^2 Heat Demand per m^2 GFA (w/M^2) Heat Consumption per m^2 GFA (kWh/m^2) Number of Residential Dwellings Number of Boilers and their heat outputs **Secondary Side Design Conditions** Flow Temperature (max at peak) ^0C Flow Temperature (min in Summer) ^0C Return Temperature ^0C Maximum Design Working Pressure, bar G Pressure Drop Through Heat Exchange, Kpa **Plant Room Details** Number of Heat Exchangers Proposed Size of Skids (LxWxH),m Size of Plant Room (LxWxH),m Location of Plant Room (attach sketch) Access Details (attach sketch) Other Comments	
	15.8.1		*Quality/Making Sustainable Neighbourhoods* • Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including 'Quality Housing for Sustainable Communities: Design Guidelines' (2007), 'Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities' (2009) and accompanying 'Urban Design Manual (2010)', Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for	The proposed development has regard to and follows the principles set out on the referenced guidelines. See Architectural Design Statement for details. Sections 6.8 and 6.9 of this Report responds to the '*Quality Housing for Sustainable Communities: Design Guidelines' (2007)* and the '*Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities'* (2009) and accompanying '*Urban Design Manual (2010)*'. The proposed layout for the development has considered the NTA Permeability Best Practice Guide (2015), providing clear linkages to the adjacent areas, whilst the *DMURS Compliance Report* prepared by Barrett Mahony Consulting Engineers

			New Apartments (2020) Design Manual for Urban Roads and Streets (2019) and Design Manual for Quality Housing (2022).	provides details of how the proposed development complies with DMURS, concluding that the "*design proposals reflect a robust integrated design approach that seeks to deliver safe, convenient and attractive street networks which promote a sustainable community environment.*".
	15.8.2		*Community and Social Audit* Applications for large residential developments or mixed use developments should include provision for community type uses. All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Each of the subsections below shall be assessed as part of the community and social audit. A community and social audit should address the following: • Identify the existing community and social provision in the surrounding area covering a 750m radius. • Assess the overall need in terms of necessity, deficiency, and opportunities to share/ enhance existing facilities based on current and proposed population projections. • Justify the inclusion or exclusion of a community facility as part of the proposed development having regard to the findings of the audit.	A *Community and Social Infrastructure Audit* has been prepared by Thornton O'Connor Town Planning which concludes: "*In conclusion, the catchment area is well served by schools, convenience retailing, large scale recreation and amenity provision, and places of worship. There is a potential deficit in theprovision of childcare services, although the per capita provision is high, as is the proportion of places versus anticipated resident population take-up. The site is very well connected by public transport to arts and cultural amenities in Dublin City Centre and adjacent areas, however there is potential to provide for a community facility which could augment space available for local arts and cultural activities.* *While the Audit identified a range of community and arts facilities located within the catchment, given the location of the subject site, the scale of the proposed development, and the nature of the population in the area (resident population, alongside a large daytime/working population, and the proposed incoming university student population), the proposed provision of additional community and arts infrastructure is considered to be appropriate as part of the overall development, would represent 5.78% of the net floorspace of the proposed development, and would offer the greatest net benefit to the community increasing participation and voluntary activity within the resident student population and the local community, while*

			Where it is determined that new facilities are required the following design criteria should be considered: • The design of the facility should allow for multi-functional use. • Community facilities must be located so that they are conveniently accessible by both residents and others who may have reason to use the facility. • Community facilities should be well integrated with pedestrian and cycle routes and, where they serve a wider community, located on or close to a quality public transport route. • Re-development proposals on sites containing a pre-existing community use / and / or recreational use should ensure that this use in terms of floor / ground space is no less than that on-site prior to redevelopment, and if possible, should represent increased provision. Community facilities must be accessible to all members of society including persons with disabilities and the elderly.	*also encouraging local residents to recognise that such developments are positive for the regeneration of thecommunity and the locality. The proposal comprises c.1,533 sq m of internal and external cultural/ community use space proposed (571 sq m at ground floor level, and further 982 sq m atbasement), and would be substantial in comparison to most arts venues in the city.* *This report submits that the social and community uses proposed as part of this planning application constitute an appropriate provision of this type of use for future residents, having regard for the existing provision identified in the survey area. The proposed uses will contribute to the health and wellbeing of the wider community."*
	15.8.3		*Schools* In accordance with the requirements for social and community audit, planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand. In the case of very large-scale developments (800+ units), the phased completion of	No school requirement for Student Accommodation.

			the dwellings must be linked with the provision of new schools.	
	15.8.4		In order to meet this objective, one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units, shall be provided in all new mixed use and residential schemes. As part of the community and social audit, an assessment of the childcare facilities in the surrounding 1km radius of the proposed should be included. The analysis should have regard to: • The make-up of the proposed residential area, i.e. an estimate of the mix of community that the housing area seeks to accommodate (if an assumption is made that 50 % approximately of the housing area will require childcare, how does the proposal contribute to the existing demand in the area). • The number of childcare facilities within walking distance (i.e. 1km) of the proposal. • The capacity of each childcare facility and the available capacity by completion of the project. • The results of any childcare needs analysis carried out as part of the city childcare strategy or carried out as part of a local or area action plan or as part of the development plan in consultation with the city childcare committees, which will have identified areas already well served or alternatively, gap areas where there is under provision, will also contribute to refining the base figure.	No creche requirement for Student Accommodation

			• Childcare facilities should also be located in existing residential areas, business/technology parks, industrial estates, areas of employment and within office blocks, with such provision being established having regard to the Dublin City Childcare Committee audit and needs analysis (for full details, see Childcare Facilities, Guidelines for Planning Authorities 2001).	
	15.8.5		*Public Realm* All residential developments that include lands within the public realm must agree, subject to a letter of consent, with the planning authority that the proposed scheme is compliant with the public realm guidance as set out on the Dublin City Council website. https://www.dublincity.ie/residential/planning/strategic-planning/public-realm-strategy Details of road widths, public footpaths and accessibility can be found in Appendix 5 of the plan. Where new public spaces that will contribute to the public realm of an area are proposed, applicants must demonstrate that such spaces provide accessibility to all, are easy to navigate and create safe and secure environments. Please see guidance on street furniture, public lighting and accessibility in this regard as set out in Section 15.17.	A letter of consent has been received from Dublin City Council for the LRD Application facilitating the proposed works to the roadway and footpath of the Naas Road. As stated in the *Civil Engineering Infrastructure & Surface Water Management Report*: *"As part of the development, it is proposed to construct a new pedestrian crossing of the Naas Road and Luas Tracks. This will involve new signal-controlled crossings of the inbound and outbound carriageways of the Naas Road, and an uncontrolled crossing of the Luas tracks, all with the appropriate facilities for vulnerable road users.* *The new crossing will facilitate residents of the proposed development who will be looking to utilise public transport from the north side of the Naas Road. It will also provide better pedestrian linkages for residents to travelling north from the development."*
	15.8.6		*Public Open Space* All residential development is required to provide for public open space. Regard should be had to the guidance set out in Section 15.6.12 above regarding	The subject lands are zoned Z14 and thus require 10% public open space. The proposed development has useable public open space of 31%, well in excess of the 10% requirement. As detailed in the *Landscape Design Statement* and *Planning*

			landscaping requirements, and also Section 15.6 on Green Infrastructure. The public open space requirement for residential developments shall be 10% of the overall site area as public open space. In the case of residential developments on Z12 and Z15 zoned lands, additional open space is required in order to retain the existing open character of the lands. A total of 25% public open space will be required within these zones.	*Report*, the public open space provision will be a significant benefit for the local community. The riparian zone will provide 1,261 sq m of visual open space, taking up 13% of the total site area. This space is not useable public open space as access is not permitted to members of the public, with access only permitted for maintenance purposes. This is to protect the new flora and fauna produced as a result of the measures taken to daylight the River Camac.
	15.8.10		Gated Communities Dublin City Council will resist gated communities within the city and there is a general presumption against same in order to promote permeability and accessibility in the urban area. Where a gated scheme is proposed, the applicant must demonstrate the operational management strategy for the development and clearly set out the functionality of the gate mechanism proposed. The ongoing management and maintenance of the development will need to be demonstrated to avoid any situations where the mechanism malfunctions. The applicant will also be required to demonstrate how the gate will function in respect of traffic movements and the potential wait time on the public road. Sufficient car parking will also need to be provided in order to prevent overspill car parking onto the public road.	The development will not be gated, with private access to the student accommodation only. Visitors to the site is encouraged through the provision of public open spaces, the retail unit and cultural and community uses proposed. The Central Plaza located to the northwest of the site acts as a welcome / arrival open space fronting Naas Road, where opportunities for various large outdoor evets such as craft markets or college fairs could be facilitated, as stated in the *Landscape Design Report* prepared by Stephen Diamond Associates. The beautifully landscaped riparian zone surrounding the daylighted River Camac will attract people to the site, as this is an experience not many people encounter. Permeability through the site is sought after by connecting the subject site with the Carriglea site to the south. The Connection Plaza has been designed as a pedestrian priority shared surface, ensuring there is a smooth transitional link between the riparian zone at the subject site and the linear park at the Carriglea site.

				The retail unit is located to the northern part of Block 2 at ground floor level, facing onto Naas Road. This retail unit will generate a high-level of footfall within the site by providing a convenience shop for students of the development and residents of the surrounding area to use. The cultural and community space will be available for members of the public and students to use. This space is provided with a separate access to the student accommodation to ensure the public cannot access it. The external student amenity space at basement level, ground, second and nineth floor level allows a balance between enclosure and exposure by being located separately to the public open space but still experiencing a high level of amenity. The development provides a good balance between providing easily accessible public open spaces in addition to some gated communal spaces for student use.
	15.9.3		*Dual Aspect* Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations. Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate.	The proposed development has 67% dual aspect clusters. Single aspect clusters have been positioned so that they do not face northwards, still maximising the level of light entering the clusters. Please see the Architectural Design Statement and HQAT for details.

			In prime city centre locations, adjoining or adjacent to high quality, high frequency public transport, 33% dual aspect may be accepted in locations where there are specific site constraints such as tight urban infill sites up to 0.25ha or where there is a need to maintain a strong street frontage. In the outer city (beyond the canal ring) and within the SDRA's, schemes with a minimum of 33% dual aspects units will only be considered in exceptional circumstances. Where single aspect is proposed, the number of south facing units should be maximised. East and west facing units are also considered acceptable. The living spaces in these units should be situated with the most preferable orientation for maximum access to direct sunlight. North facing units will only be considered where they face an area of high amenity value such as a public park, water body or another significant view of interest. For clarity, north facing units are units which predominantly face north (i.e. over 50% of the façade). North east and north west units are defined as units that fall within a 45 degree angle of due north. This unit configuration will be considered in limited circumstances on a case by case basis. Please refer to Section 15.9.3 for example of dual aspect units that will be accepted by DCC.	
	15.9.9		*Roof Terraces* Roof terraces may be provided in certain circumstances subject to an assessment of accessibility, safety and micro-climatic impacts. Roof terraces will not be permitted as the primary form of	Due to the requirement to provide 5% cultural and community space and 10% public open space, the majority of the private amenity space is provided internally at 4,027 sq m. However, there is 1,174 sq m of useable external amenity space provided as a terrace at basement level, space at ground floor level, and a roof garden at second and nineth floor level.

			communal amenity space but may contribute to a combination of courtyard and or linear green space. The provision of roof terraces does not circumvent the need to provide an adequate accessible ground floor residential amenity that achieves adequate sunlight and daylight levels throughout the day unless exceptional site specific conditions prevail. It must be demonstrated that roof terraces are suitable for the intended use in terms of wind comfort levels, daylight and sunlight, noise impacts and safe and secure accessibility for all users, particularly children. Roof terraces must also accommodate landscaping features such as tree planning, shrubs and outdoor seating in order to create a quality green environment. Any such planting should be of species which can thrive in low soil depth planters and when exposed to wind conditions. How such roof terraces are to be maintained and managed must also be demonstrated. See also Appendix 11 for guidance on green roofs.	The terrace at basement level is conceptually divided into 2 No. Sub-spaces, namely an outdoor gallery and exercise studio. Students can spend their time strolling and relaxing in the outdoor gallery or can site down and contemplate and socialise with each other surrounded by the wilderness setting of the riparian zone and artwork. They can engage in active recreation in the outdoor exercise studio which is covered with a yellow uplifting rubber safety surface, creating a place for students to get creative with types of exercises. They can perform various routines or bring out a selection of weights to perform weighted exercises, or can use this area for stretching and yoga. At one time, 10 No. (2m x 0.8m) mats can fit comfortably with a 50 cm protection space around each mat. The ground floor level amenity space is located adjacent to the riparian zone at Block 1. This space has been designed as an outdoor study area with outdoor desks, chairs and benches provided. A 1.8 metre high fence with a gate and planting buffer separates this student communal area from the public realm on the ground floor. The roof garden at second floor level of Block 1 and at nineth floor level of Block 2 provides a different viewing perspective of the riparian zone and the wider site. Students get an exceptional birds-eye view of the riparian corridor and other public open spaces across the site. These spaces create social hubs and provides meeting places where students can meet and get to know each other. Students can socialise in groups or by themselves, taking in the view of the riparian zone and surrounding urban setting. 50% of the roof garden is covered with intensive planting, improving the microclimate within the elevated garden for users.

				All external communal amenity space will be fully wheelchair accessible.
	15.9.16		Microclimate – Daylight and Sunlight, Wind and Noise All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. These assessments should outline compliance with the relevant standards and ensure a high level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.	Although not an apartment scheme, the following Reports have been provided: • *Microclimatic Wind Analysis and Pedestrian Comfort Report* prepared by IN2; • *Inward Noise Impact Assessment* by AWN Consulting. • *Daylight and Sunlight Assessment Report* by 3D Design Bureau. Each of these Reports demonstrates high levels of residential amenity for the future residents of the scheme.
	15.9.16.1		Daylight and Sunlight A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme. A best practice guide for the assessment and methodology of Daylight and Sunlight Assessments is set out in Appendix 16.	A *Daylight and Sunlight Assessment Report* has been prepared by 3D Design Bureau and is enclosed separately.
	15.9.16.2		*Wind* A wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to	Please see enclosed a Report entitled *Microclimatic Wind Analysis and Pedestrian Comfort Report* prepared by IN2 which demonstrates that the current design creates no adverse wind affects at the subject site.

			analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity spaces, roof gardens and at the entrance points to the scheme. The Lawson Comfort Criteria sets out an appropriate pedestrian comfort levels in a given space based on suitability for pedestrian activities. The purpose of the assessment is to clarify that the intended use of a space is suitable and to identify mitigation measures required (if any). All areas within a development should be at a satisfactory level to ensure maximum comfort levels for all users.	The analysis illustrated how conditions for pedestrians at all assessed outdoor amenity spaces were determined to have comfortable wind conditions for suitable for "Outdoor Dining" or "Pedestrian Sitting/ Standing" with no adverse wind affects predicted to occur. Overall, the proposed development was determined to not negatively impact on its receiving environment in terms of wind microclimate.
	15.9.16.3		Noise All apartment developments should be designed as to ensure noise transmission between units and from external or internal communal areas is minimised. Guidance for noise reduction in building is set out in BS 8233:2014. The following principles are recommended for minimising disruption from noise in dwellings: • Utilise the site and building layout to maximise acoustic privacy by providing good building separation within the development and appropriate noise insulation measures to reduce noise transfer and vibration to neighbouring buildings and noise sources. • Arrange units within the development and the internal layout to minimise noise transmission by	An *Inward Noise Impact Report* has been prepared by AWN Consulting. This Report demonstrates that the scheme has been comprehensively considered from a noise perspective having regard to the prevailing noise environment. The development site lies outside of all airport noise zones. The Noise Report includes specific sound insulation performance values for the building façades including the glazing to achieve suitable internal noise levels. The *CEMP* by AWN also sets out additional measures in relation to noise and vibration during construction. Operational phase noise from the development will be controlled to ensure internal noise levels within the student accommodation does not exceed the internal noise levels set out in the report (Taken from BS 8233). Given the proximity of the student accommodation units to the plant areas of the development building itself, the operational noise levels to the

			locating busy, noisy areas next to each other and quieter areas next to quiet areas. • Keep stairs, lifts, and service and circulation areas away from noise sensitive rooms like bedrooms. Particular attention should be paid to the siting and acoustic isolation of the lift motor room. Proposals close to noisy places, such as busy streets / railway lines, may need a noise impact assessment and mitigation plan. (Noise maps and Noise Action Plan are available at www.dublincity.ie). Please also refer to Section 15.18.9 – Noise which provides details on areas of the city with greater potential to be affected by noise given proximity to critical infrastructure such as Dublin Airport.	surrounding environment will be well control to not generate any negative noise impact on the surrounding sensitive buildings
	15.9.17		*Separation Distances (Apartments)* Traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Separation distances between buildings will be assessed on a case by case basis. In all instances where the minimum separation distances are not met, each development will be assessed on a case by case basis having regard to the specific site constraints and the ability to comply with other standards set out within this chapter in terms of residential quality and amenity.	The smallest distance between Block 1 & 2 is 17 metres, however, this is regarding only 4 No. student bedspaces and 2 No. Communal kitchen / living space from the second floor to nineth floor. This is considered an appropriate separation in a student accommodation scheme. As illustrated in the contiguous elevations prepared by HKR Architects, the separation distance between Block 2 of the proposed development and the closest building on the Concord site is c 32.8 metres and to the closest building on the Carriglea site is c. 21.9 metres. This is considered a generous separation distance between the proposed development and surrounding development at the Concord and Carriglea site.

	15.9.18		Overlooking and Overbearance 'Overbearance' in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space service a home. In established residential developments, any significant changes to established context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance. Overlooking may be overcome by a variety of design tools, such as: • Building configurations (bulk and massing). • Elevational design / window placement. • Using oblique windows. • Using architectural features. Landscape and boundary treatments.	An aim of the proposed development was to keep overlooking to a minimum, with distances to the adjacent Carriglea site to the south and Concord site to the west well in excess of 22 metres. The distance between Block 2 and the nearest building at the Concord site is c. 32.8 metres and c. 21.9 metres to the closest building at the Carriglea site. This level of separation is sufficient to provide the expected level of street enclosure that would be expected in a typical urban setting.
	15.13.1		*Student Accommodation* The City Council supports the provision of high-quality, professionally managed, purpose-built third-level student accommodation, either on campus or in accessible locations adjacent to quality public transport corridors and cycle routes, in a manner which respects the residential amenities of the locality. Proposals for student accommodation shall be in accordance with Policy QHSN45. Student accommodation should make a positive contribution to the built environment, in terms of design quality, scale, height and the relationship to adjacent buildings. The external layout, including any necessary	Please see Section 8.3.2 of this Report for details.

			security arrangement, should be designed to avoid isolating developments from the surrounding community. In assessing proposals, the planning authority will have regard to the pattern and distribution of student accommodation in the locality, and will resist the overconcentration of such schemes in any one area, in the interests of achieving a sustainable mix of development, whilst also providing for successful urban regeneration, good public transport / cycling / walking connectivity, and the protection of residential amenity. All applications for student accommodation must be accompanied by documentation outlining how the scheme will be professionally managed including confirmation that all occupiers will be students registered with a third-level institution. Documentation must also outline how the scheme will support integration with the local community, through its design and layout. Permissions for student housing will be subject to a condition requiring planning permission for a change of use to other types of residential accommodation. The provision of Part V (Social and Affordable Housing) of the Planning Acts do not apply to student accommodation in the City Council area.	

			In assessing applications for purpose built student accommodation the planning authority will have regard to the following key factors: • 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. It is preferable in principle that student needs are met as far as possible in purpose built and managed schemes rather than the widespread conversion of family housing. In general, such provision can take place at relatively high densities. Open space and car parking provision can be tailored to reflect the nature of the proposed use. However, these considerations should not compromise design quality. Developments should be close to the universities and colleges and accessible by public transport. In assessing the degree of concentration of student accommodation, the Council will take into account the nature of the locality in terms of mix of land use and housing types, the existing and proposed number of students in the locality. To assist in this assessment the applicant will be requested to submit evidence of existing, proposed and under construction student	

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<tr><td></td><td></td><td></td><td>accommodation developments within an area, including a map showing all such facilities within 1km of a proposal.</td><td></td></tr>
<tr><td></td><td>15.13.1.1</td><td></td><td>Unit Mix

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

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

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

The cluster model shall provide minimum bedroom sizes as follows:

Table 15-7: Minimum Bedroom Sizes for Student Accommodation Clusters
<table><tr><th>Bedroom Type</th><th>Bedroom Size (min)</th><th>Bedroom Size including En-Suite (min)</th></tr><tr><td>Single Study</td><td>8 sq. m.</td><td>12 sq. m.</td></tr><tr><td>Twin Study</td><td>15 sq. m.</td><td>18 sq. m.</td></tr><tr><td>Disabled Study</td><td>-</td><td>15 sq. m.</td></tr></table>
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</td><td>The proposed development will see the delivery of 871 No. standard rooms, 47 No. accessible studios, and 23 No. studios. Each room will be a minimum of 12 sq m and each accessible studio and studio will be a minimum of 25 sq m. All bedrooms will have their own en-suite. The proposed cluster type will range is 3 No. students to 8 No. students per cluster and varies per floor level.

Please see Section 8.3.2 of this Report and the HQAT in the Architectural Design Statement by HKR Architects for further details.</td></tr>
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			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.	
	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. Proposed developments shall be guided by the principles and standards set out in Appendix 16.	Out of the 123 No. Clusters proposed, 67% of them are designed to be dual aspect, well in excess of 50% required for this location. Please see the submitted *Daylight and Sunlight Assessment Report* which demonstrates how the proposed development is compliant with BRE 209 and I.S. EN 17037 Criterion.
	15.13.1.3		*Communal Facilities* Communal facilities and services which serve the needs of students shall be provided both internally and externally within a scheme. Adequate external open space of suitable orientation should be provided within developments for the amenity of students. Generally ground floor courtyards that achieve appropriate daylighting and sun lighting will be required. In certain circumstances, terraces and roof gardens will be considered but only in addition to appropriate ground level amenity provision. The provision of indoor communal space can be broken down to indoor amenity spaces such as cinema rooms, study rooms, games rooms etc. and indoor services such as laundry facilities, caretaker/ security and refuse facilities etc.	The proposed development seeks to include 5,201 sq m of communal amenity space. This will be provided through 4,027 sq m (77%) of internal amenity space and 1,174 sq m (23%) of external amenity space. Due to the requirement to provide 5% cultural/community space and 10% public open space, the majority of the private amenity space is provided internally. The total communal amenity space per bedspace is 5.53 sq m. In combination with the 4 sq m per bedspace of kitchen / living / dining space in each cluster and studio, this brings the total communal space per bedspace to 9.53 sq m, which is fully in accordance with the requirements of the *Development Plan.* There is 70 sq m of external amenity space at first floor level of Block 2, however, this space does not meet the BRE Guidelines for appropriate levels of daylight and sunlight and is thus removed from the total useable amenity space. If the 70 sq m is included in the total student amenity space, the communal space per bedspace would increase to 5.6 sq m, and in conjunction with the 4 sq m per bedspace of kitchen / living / dining space in each cluster and studio, the total communal

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<td>Where accommodation is provided on-campus, communal facilities will be assessed on a case-by-case basis having regard to the level of and access to on campus amenity. Details are to be provided as part of the application.

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
<table><tr><th>Communal Requirement</th><th>Area</th></tr><tr><td>Indoor / Outdoor</td><td>5-7 sq. m. per bedspace</td></tr><tr><td>Kitchen / Living / Dining</td><td>4 sq. m. per bedspace</td></tr><tr><td>Total</td><td>9-13 sq. m. per bedspace</td></tr></table></td>
<td>space for the proposed development would be 9.6 sq m per bedspace.

The internal amenity spaces are provided at basement level, ground floor and first floor level, totalling to 4,027 sq m of floor space. The types of spaces proposed are hubs, a game room and karaoke lounge for students to hangout and socialise with one another, while the library and breakout space will provide a quiet space for students to study outside their bedroom. A gym is also provided to promote a healthy-lifestyle amongst students. The internal amenity space at basement level and first floor level will have direct access to external amenity spaces, while the internal amenity space at ground floor level has direct access to/from the Central Plaza.

The external useable amenity spaces are provided as a terrace at basement level, space at ground floor level, and a roof garden at second and nineth floor level, totalling to 1,174 sq m of useable floor space. The terrace at basement level is conceptually divided into 2 No. Sub-spaces, namely an outdoor gallery and exercise studio. Students can spend their time strolling and relaxing in the outdoor gallery or can site down and contemplate and socialise with each other surrounded by the wilderness setting of the riparian zone and artwork. They can engage in active recreation in the outdoor exercise studio which is covered with a yellow uplifting rubber safety surface, creating a place for students to get creative with types of exercises. They can perform various routines or bring out a selection of weights to perform weighted exercises, or can use this area for stretching and yoga. At one time, 10 No. (2m x 0.8m) mats can fit comfortably with a 50 cm protection space around each mat. The ground floor space will provide an outdoor study area fitted with desks, chairs and</td>
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				benches for students to study and get some fresh air also. The roof gardens at second and nineth floor level provide a different viewing perspective of the riparian zone and the wider site. Students get an exceptional birds-eye view of the riparian corridor and other public open spaces across the site. These spaces create social hubs and provides meeting places where students can meet and get to know each other. Students can socialise in groups or by themselves, taking in the view of the riparian zone and surrounding urban setting. 50% of the roof gardens are covered with intensive planting, improving the microclimate within the elevated garden for users. All external communal space is fully accessible for students of all abilities. Please see Section 8.3.2 of this Report, Section 3.0 of the *Landscape Design Report* prepared by Stephen Diamond Associates, and page 35-37 of the *Architectural Design Statement* prepared by HKR Architects for further details regarding student amenity space.
	15.13.1.4		*Car Parking / Bicycle Parking* Designated car parking will not be supported in student accommodation schemes in the city. However, car parking for persons with disabilities should be provided. See Appendix 5 for further details. Provision can be made to provide for a car sharing service for the use of residents. All student accommodation developments should however, be accompanied by a mobility management plan – refer to transport appendix 5. A minimum of one cycle parking space per resident should be provided within the development as well as additional visitor parking	The maximum car parking standards for student accommodation located in Zone 2 is 1 per 20 No. bedspaces, according to Appendix 5 of the *Development Plan.* In order to reduce carbon emissions both on-site and in the surrounding area, the proposed development seeks to provide only 7 No. car parking spaces. The proposed development will provide 941 No. secure bicycle spaces for students located on the ground floor and basement level of Block 1. In total, 218 No. external spaces are provided for visitors, as well as 3 No. internal spaces for the retail, cultural and community space.

			at surface level at a rate of 1 per 10 no. residents – refer to Appendix 5 for further details.	For further information, please see Section 8.3.2 of this Report and the *Residential Travel Plan report* prepared by Barrett Mahony Consulting Engineers.
			Temporary Use 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. Appropriate conditions will apply.	Noted
	15.15.1.3		*Best Practice* All archaeological reports submitted with a planning application and/or prepared in compliance with planning permission shall be produced in accordance with Excavation Reports Guidelines for Authors, (NMS, 2006). Archaeologist to review this section of the Plan.	As advised by Rubicon, the *Archaeological, Architectural and Cultural Heritage Impact Assessment* was produced in accordance with the Guidelines.
	15.15.1.7		Archaeological Excavation When planning permission for development involving sub-surface excavation is granted, the applicant's attention will be drawn to the legal obligation to report the discovery of archaeological finds to the National Museum of Ireland.	It is recommended that development works including required test trenching will be monitored by a suitably qualified archaeologist, ensuring appropriate reporting of archaeological objects and sites/features to the statutory heritage bodies.
	15.15.1.8		*Archaeological Mitigation*	The *Archaeological, Architectural and Cultural Heritage Impact Assessment* has identified that the site as a whole is an area of

			Where a site has tested positive for archaeology, in situ remains shall be evaluated for preservation in situ. In situ medieval structures shall be carefully evaluated with the aim of preservation and presentation in situ within the new development. Where preservation in situ is not feasible, sites of archaeological and/or industrial heritage interest shall be subject to a full archaeological excavation and post excavation analysis according to best practice in advance of redevelopment. Where an excavation is the agreed mitigation strategy the licenced archaeological director shall submit bi-weekly briefing notes to the City Archaeologist for the full duration of the excavation. A preliminary excavation report in digital and hard copy shall be submitted to the planning authority for the attention of the City Archaeologist within four weeks of the completion of the excavation or of each phase of the excavation and a detailed final report submitted within twelve months of the completion of the excavation. The results of all archaeological excavations shall be evaluated for publication either as a monograph or scholarly article, within 1 year after archaeological site completion. Information about medieval sites will be disseminated to the public through the Friends of Medieval Dublin or similar free event within 1 year of site completion. The excavation archive shall be prepared in accordance with Dublin City Archaeological Archive (DCC, 2008) and submitted to the Dublin City Archaeological Archive within 1 year of excavation completion.	archaeological potential and a programme of archaeological test trenching has been recommended.
	15.15.1.9		*Preservation In Situ*	Should archaeological material be recorded during advance test trenching or during monitoring of development groundworks, an appropriate programme of mitigation will be

			Where a proposed development is at a known Monument / Site or within an Archaeological Zone, discussions about the retention of features within / below developments (preservation in situ) and mitigation options shall take place at the outset of project planning and shall be reviewed at each stage of the project. Before considering whether an archaeological site can be appropriately retained within a development (preserved in situ), the following shall be addressed: 1. The current state of preservation of the archaeological finds and deposits and how they contribute to the site's significance. 2. The likely development and how these will affect the site's significance. 3. For sites containing waterlogged archaeological remains, the availability and quality of water on the site and how sensitive this hydrological regime is to changes. Preservation assessments shall form a discrete part of desk-based assessments and site evaluation reports. Consideration shall be given to the impact of any development proposal on waterlogged deposits that could be potentially threatened through changes to the hydrological regime, water levels and quality. Test excavations shall be carried out to investigate and evaluate the deposits and the artefacts they contain in sufficient detail to establish their significance, their state of preservation and their susceptibility to adverse impact from proposed development. Preservation assessments (including characterisation of the environmental conditions of the deposits) to form a regular part of the evaluation methodology for sites where retention within the development is likely to be	developed by the monitoring archaeologist in consultation with the City Archaeologist, the Department of Housing Local Government and Heritage (DHLGH) and the National Museum of Ireland National Museum of Ireland (NMI).

			the final mitigation outcome. When the state of preservation of material is poor, and further burial following development is likely to cause additional damage to that material, excavation of the archaeological remains to recover their remaining significance and evidential value is the most appropriate strategy. Where sites contain waterlogged archaeological remains, water environment studies to determine water availability and water stresses may be required. If the condition of surviving material and deposits is good and development risks are not going to cause a change to below ground environments (including site hydrology), then harm to significance may be limited. In these instances, the retention of the site and its future management as part of the development may be achievable. For such sites, monitoring will not normally be necessary. Where there is concern about potential impacts of development on well preserved archaeological remains, it is good practice for monitoring to only be considered appropriate if a mitigation scheme is in place to manipulate water levels or provide access for future excavation if environmental conditions deteriorate.	
	15.15.1.10		*Piling and Archaeology* Where piling is being considered as part of a foundation design on a site containing archaeological remains, a range of site-specific information will be needed to enable sound decision taking with regard to the particular technical issues raised by the use of piled foundations.	The *Archaeological, Architectural and Cultural Heritage Impact Assessment* identified that the site as a whole is an area of archaeological potential and a programme of advance archaeological test trenching has been recommended.

			• The applicant shall provide sufficient information demonstrating an adequate understanding of the significance of the archaeological site and assessment of potential harm to that significance arising from the development. • The planning application shall include an appropriate desk-based assessment and where necessary the site will be evaluated by way of archaeological testing in advance of the grant of permission. • Sufficient geotechnical site investigation shall be undertaken in accordance with Eurocode 7, early in the design process to ensure that appropriate engineering information is available to allow for a flexible foundation design and reduce the impact on archaeological remains. • The developer shall consider foundation options and inform the piling contractors that archaeological remains are present on site before they tender. Technical aspects associated with piled foundations will be appropriately assessed. These include but are not necessarily limited to: 1. The potential for the particular pile type utilised to damage archaeological deposits. 2. The cumulative impact of successive piling on a site resulting in damage to so much of a site that future re-examination would not be worthwhile.	

			3. The potential for piling to change the site hydrology, draining waterlogged deposits.	
	15.16		*Sustainable Movement and Transport* Sustainable and efficient movement of people and goods is crucial for the success and vitality of the city. The Plan seeks to promote ease of movement within and around the city as well as playing a key role in safeguarding the environment and adapting to the impacts of climate change. This policy approach promotes the integration of land use and transportation, improved public transport and active travel infrastructure, an increased shift towards sustainable modes of travel and an increased focus on public realm and healthy place-making. This Plan also looks to the future of mobility in the city including the increasing role of shared mobility schemes, micro mobility options, electric vehicles and the application of technology in the mobility sector. Within this framework, a number of development standards are set out which are applicable to all developments. Details of these standards are set out in Appendix 5 in relation to: • Access and Design Standards; • Traffic and Transport Assessments; • Mobility Management and Travel Planning; • Service Delivery and Access Strategy; • Design and Construction Standards and Processes for Roads and Footpaths; Cycle and Car Parking Standards and Management.	The proposed development has been designed in reference to the local sustainable movement and transport objectives. The predicted travel patterns for the residents of the proposed development are discussed in section 7 of the Residential Travel Plan report. The analysis within the report, which utilises information obtained from the TRICS database, indicates that there will be a 70 %: 30 % split between public transport use and walking / cycling, which exceeds the Dublin City Council mode share targets. A *Traffic Assessment Report* was prepared and concludes that the proposed development will have an 'insignificant impact' on the surrounding road network. A Mobility Management is outlined in the *Residential Travel Plan.* The construction details for all areas of the development which are proposed to be taken in charge will be in accordance with the Design and Construction Standards for Roads and Footpaths document.

	15.17.2		*Public Lighting* Public lighting assists in providing a safe and secure environment. The Council will ensure that public lighting is appropriately and sensitively designed in order to balance the requirement for adequate lighting with amenity and environmental considerations (see Section 9.5.9 of the development plan). Where significant lighting proposals are proposed, the applicant must demonstrate that the quality environment in the surrounding area is not impacted and set out details of light levels and mitigation measures as necessary. The provision of public lighting, including on public roads, shall be provided in accordance with the requirements of with the latest Public Lighting Standards IS EN13201 and further updates and should be designed to minimise the impact on protected species, such as light sensitive bat species in accordance with best practice, the National Parks and Wildlife Service (NPWS) Bat Mitigation Guidelines for Ireland (2006) and the Technical Guidance Note on Biodiversity for Development Management in Dublin City (DCC 2021). Applications for new roads and / or public spaces should ensure that the area is appropriately lit for accessibility and safety. Development proposals for public lighting shall include: • Details of the column height, siting and location of the lighting.	The scheme has been designed with ecological considerations integral to the process. Guidance in CIBSE Bats & Lighting in the UK – Bats and the Built Environment series Guidance Note 08/18 has been considered in addition to the ILP Guidance Note for the reduction of Obtrusive Light GN01:2011. Details of the column height, siting and location of the lighting has been included in the Delap & Waller documents. Images and dimensions of the specific lantern type and design has been included, final specification is by others as part of the detailed design process, this should include the energy efficiencies. Lux levels calculations have been carried out and provided as part of the *Lighting Report*. The CEMP prepared by AWN Consulting Engineers includes management measures for lighting to reduce overspilling during construction such as switching off lighting during non-working hours where possible and utilising directional lighting.

			• Details of the specific lantern type and design. • Details of lighting specification including lighting class, lux levels and energy efficiencies. • Site lighting report to assess the impact of light overspill to the surrounding area. Site lighting should also be considered throughout construction period and the impact on the surrounding properties. Details of such should be included in the construction management plan.	
	15.17.3		*Public Art* Public art can make a positive contribution to the cultural identity and visual appearance of an area and can be utilised to identify historic events and features adding to the quality and engagement of the public realm. The provision of artwork on hoarding will also be supported in accordance with the requirements as set out below. New public artwork should integrate with its immediate location and the context of the surrounding environment. Proposals for public artwork should: • Consider scale, form and impact on the public realm, pedestrians and road users. • Illustrate a comprehensive understanding of site considerations, and the physical, • social, historical, topographical and architectural context. • Provide for the highest aesthetic quality in terms of materials and finishes with low • maintenance value.	The scheme includes provision for public art, comprising a large totem-style sculptural piece within the Central Plaza as well as sculptures placed in the outdoor gallery at basement level and some in the roof garden at second floor level. The inspiration behind the chosen artwork is the 'Wildlife of River Camac', as stated in the *Landscape Design Report* Stephen Diamond Associates, whereby the "*sculptures will relate to the creates (eg, birds such as herons, grey-wagtails, kingerfishers, fish like the brown trout, dragonflies and amphibians like frogs) that are found within the riparian corridor.".* Large granite boulders are also proposed, scattered throughout the site in the form of a "*land art constellation".* The boulders are used in the River Camac as a form of bioengineering techniques to act as anchors / ballast to keep all of the other bioengineering elements of and other proposed landscaped items in place, as well as providing landings for wildlife ad a great place for basking, feeding and preening. The boulders located along the River Camac and riparian corridor spill out across the site, further enhancing the riparian identity of the site. Please refer to the *Landscape Design Report* by Stephen Diamond Associates for further information.

			• Engage with the local community to enhance social relevance and significance.	
	15.18.1		*Construction Management* All developments comprising 30 or more housing units and commercial developments (as well as institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan. In the event of a grant of permission, and on appointment of a contractor, a final construction management plan will be required to be agreed with the Planning Authority. Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume of Construction and Demolition (C&D) waste; and Civil engineering projects which generate in excess of 500 cubic metres of waste materials used for development works on the site should also be accompanied by Construction Management Plans. The construction management plan shall set out the details of the on-site operations including traffic management (site access, deliveries and maintenance and staff parking), waste management, environmental impacts such as noise, air quality, vibrations and any other relevant detail associated with the development. Where appropriate, excavated material from development sites is to be reused on the subject site.	A *Preliminary Construction & Environmental Management Plan (CEMP)* forms part of the planning application package of documentation. The CEMP explains the construction techniques and methodologies which will be implemented during construction of the proposed development. The CEMP mitigation measures will be implemented to ensure that pollution and nuisances arising from site clearance and construction activities is prevented where possible and managed in accordance with best practice environmental protection. The CEMP will be implemented and adhered to by the construction Contractor and will be overseen and updated as required if site conditions change by the Project Manager, Environmental Manager and Ecological Clerk of Works where relevant. All personnel working on the site will be trained in the implementation of the procedures. The construction Contractor will provide a further detailed CEMP to include any subsequent planning conditions relevant to the proposed development and set out further detail of the overarching vision of how the construction Contractor of the proposed development manage the site in a safe and organised manner.

			The construction management plan should set out a clear timeline for the development, and details of the relevant on site contact for liaison with surrounding residents and businesses. For large construction projects (30 or more residential units of 1,000 sq. m. of commercial development), details of the site contact should be circulated to the local community, and where appropriate resident monitoring committees established for the duration of the project in order to promote best construction management and considered construction practices to protect the amenities of adjacent properties. The plan should consider the potential cumulative impacts of any adjacent development project under construction or planned for construction within the timeframe of the project, and set out appropriate mitigation measures to manage such cumulative impacts. In reviewing construction management plans, the planning authority will have regard to the following: • Hours of operation. • Construction/phasing programme. • Community Liaison Strategy • Traffic Management Plan including employee parking and movements. • Noise, Vibration, Air Quality and Dust Monitoring and Mitigation Measures. • Cumulative impacts. • Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats.	

			• The management of construction and demolition waste included as part of a Construction and Demolition Waste Management Plan • Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater). • A water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains. • Details of a water quality monitoring and sampling plan. • Measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).	
	15.18.1.1		*Construction Traffic Management Plan* A Construction Traffic Management Plan (CTMP) is a key document that aims to reduce possible impacts which may occur during the construction period of a proposed development. An applicant/developer is responsible for ensuring construction activities are managed in accordance with the CTMP. Objectives and measures should be included for the management, design and construction of the proposed development to control the traffic impacts of construction insofar as it may affect the environment, local residents and the public in the vicinity of the construction works.	The *Preliminary Construction & Environmental Management Plan*, which forms part of the planning application package of documentation, includes section 6 in relation to Construction Traffic and Site Access. A more detailed Construction Management Plan will be developed by the Main Contractor prior to any works commencing on site and submitted to Dublin Coty Council for agreement.

			Where demolition is taking place on site prior to the commencement of construction, a separate demolition construction traffic management plan is required. A Preliminary Construction Traffic Management Plan may be required during the Development Management process to ensure the feasibility of construction on constrained or restricted sites. Cumulative impacts with adjacent development sites should also be considered. A CTMP is subject to ongoing reviews of construction traffic management and liaison by the contractor/developer with Dublin City Council's Roadworks Control Section throughout the period of construction. Where multiple sites are within close proximity of each other and residential housing, developers may be required to coordinate and update their CTMP in consultation with DCC and with adjoining landowners; and also participate in a traffic and construction management group coordinated by DCC. The contractor/developer shall apply for all necessary licenses and permits where required.	
	15.18.1.3		*Phasing* Dublin City Council may also require developers to submit a phasing and implementation programme for large developments including commercial development in excess of 5,000 sq. m. and residential schemes in excess of 100 units, to ensure a co-ordinated approach to the construction of the development.	By its nature a PBSA needs to be developed and occupied in one phase, particularly in the format proposed of two proximate and physically connected buildings.

			A phasing proposal should be included within the construction management plan submitted with applications for agreement with the planning authority.	
	15.18.1.4		*Hours of Operation* On sites where noise generated by construction would seriously affect residential amenity, the site and building works must be carried out between 0700 and 1800 hours Monday to Friday only, and between 0800 and 1400 hours on Saturdays only. No works shall be carried out on Sundays or bank holidays. However, deviation from these times may be permitted in exceptional circumstances, where prior written approval has been received from Dublin City Council. Such approval may be given subject to conditions pertaining to the particular circumstances being set by Dublin City Council.	Noted.
	15.18.2		*Waste Management* All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both and Construction and Operational Waste Management Plan. The construction waste management plan may form part of the overall construction management plan and shall detail the strategy in relation to on site waste storage, segregation and disposal. Development proposals shall recycle demolition material and re-use	AWN Consulting have prepared an *Operational Waste Management Plan* (OWMP) and a *Resource Waste Management Plan* (RWMP) (covers Construction and Demolition Waste). The RWMP includes details on the reuse and recycling of materials and is written in accordance with the EPAs "Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects'". The OWMP sets out the strategy for waste collection, storage and recycling. The waste storage and collection points and detail the anticipated waste collection schedule having regard

			existing building materials where possible. In all developments of 30 or more housing units or commercial developments in excess of 1,000 sq. m, a materials source and management plan showing type of materials / proportion of re use/ recycled materials to be used shall be implemented by the developer. The operational waste management plan shall set out the strategy for waste collection, storage and recycling. All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area. See also Appendix 7 for further details.	to the impact on road users both within the development and the surrounding area have been identified.
	15.18.4		*Basements* It is the policy of Dublin City Council to generally discourage any significant underground or basement development or excavations below ground level of, or adjacent to, residential properties in Conservation Areas or to protected structures. Development of basements for residential use below the estimated flood levels for flood zone areas 'Zone A' or 'Zone B' will not be permitted (Policy SI20). 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	The development includes a basement; however, the lowest residential accommodation within the development is at first floor level. The basement and ground floor spaces will be for amenity, community, cultural and retail uses. In addition, we note that the site is located in Flood Zone C, so the risk of flooding within the development is low. A *Basement Impact Assessment* prepared by Barrett Mahony Consulting Engineers is enclosed separately.

			embedded wall construction below the base of the accessible area. Detailed guidance is set out in Appendix 9 regarding the content and scope to be considered in the preparation of a Basement Impact Assessment.	
	15.18.5		*Telecommunications and Digital Connectivity* All new developments will be required to provide for open access connectivity arrangements directly to individual premises to enable service provider competition and consumer choice in line with Policy SI46 of the development plan. The provision and siting of telecommunications antennae shall take account of the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, (Department of Environment and Local Government, 1996), as revised by DECLG Circular Letter PL 07/12, and any successor guidance. Telecommunications antennae and supporting structures should preferably be located on industrial estates or on lands zoned for industrial/employment uses. Possible locations in commercial areas, such as rooftop locations on tall buildings, may also be acceptable, subject to visual amenity considerations. In terms of the design of free-standing masts, masts and antennae should be designed for the specific location.	Please refer to the accompanying *Telecommunications Report* by ISM which details the telecommunications requirements for the subject site. In summary, there will be new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18 No. antennas and 6 No. transmission dishes, together with all associated equipment.

			In assessing proposals for telecommunication antennae and support structures, factors such as the object in the wider townscape and the position of the object with respect to the skyline will be closely examined. These factors will be carefully considered when assessing proposals in a designated conservation area, open space amenity area, historic park, or in the vicinity of protected buildings, special views or prospects, monuments or sites of archaeological importance. The location of antennae or support structures within any of these areas or in proximity to protected structures, archaeological sites and other monuments should be avoided. Where existing support structures are not unduly obtrusive, the City Council will encourage co-location or sharing of digital connectivity infrastructure such as antennae on existing support structures, masts and tall buildings (see Policy SI48). Applicants must satisfy the City Council that they have made every reasonable effort to share with other operators.	
	15.18.6		*Plant Machinery* Where required, the scale of plant at roof level should be minimised and have a suitable finish or screening so that it is discreet and unobtrusive. Plant, flues and lift overruns should not be included in the height of the building, as long as they are set back and properly screened and do not significantly add to the shadowing or otherwise of natural light beyond that of the main structure. Where plant rooms are highly visible, and occupy the majority of roof space, the	The plant machinery height has been minimised as much as possible by enclosing it by sufficient screening as well as the assistance of green roofs to help any possible obtrusiveness.

			impact of such will be assessed similar to an additional floor.	
	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. For individual dwelling units, homeowners can utilise solar thermal panels that produce hot water and photovoltaic panels that produce electricity. Solar systems can be installed in the roof space of a dwelling similar to roof lights. Any solar thermal panels that are installed on or in roofs should not unduly dominate the roof and should be sensitive to the character, colour and style of the existing roof. The Planning and Development Regulations 2007 (S.1 No. 83 of 2007) set out planning exemptions for micro-renewable energy technologies for domestic houses including solar panels, heating systems and wind turbines. Please refer to the Sustainable Energy Authority of Ireland Best Practice Guide to Photovoltaics (PV) for full details on the design and requirements for PV. https://www.seai.ie/publications/Best_Practice_Guide_for_PV.pdf Large scale proposals for solar panels or any development in the vicinity of the airport will be required to submit a Glint and Glare Assessment.	Given the energy balance of the proposed development, a significant portion of the energy demand is through the domestic hot water generation. In line with NZEB requirements, this demand is addressed through LZC/Renewable Air Source Heat Pump system which meets the renewable energy requirement. Therefore, additional renewables such as solar photovoltaics are not required, and the available roof area is allocated for green roof.

			Domestic applications will be assessed on a case by case basis. All large scale proposals involving for solar panels shall be sent to Irish Aviation Authority and Dublin Airport Authority as part of the statutory consultee process.	
	15.18.9		Dublin City Council will have regard to the Dublin Agglomeration Noise Action Plan 2018– 2023 when assessing planning applications (see also Section 9.5.8: Noise Pollution). Where it is considered that a proposed development is likely to create a disturbance due to noise, a condition may be imposed by the planning authority on any planning permission limiting the hours of operation and level of noise generation. Development proposals for residential development within designated noise zones, such as Dublin Airport Aircraft Noise Zones or which may generate noise sensitive activities should be accompanied by a noise impact assessment to analyse the potential noise impact on the development proposal. The applicant is required to demonstrate good acoustic design has been followed to mitigate against any potential noise impacts. Airport Noise Zone C is partially located within the Dublin City Council administrative boundary. For further details and map based information, see Fingal County Development Plan 2017-2023 Variation 1. https://www.fingal.ie/fingal-development-plan-2017-2023. Construction noise assessment should form part of the construction management plan and set out clear mitigation measures in place throughout the entire construction phase.	An *Inward Noise Impact Report* has been prepared by AWN Consulting. This Report demonstrates that the scheme has been comprehensively considered from a noise perspective having regard to the mitigation measures that are proposed for certain façades in the scheme such as acoustic glazing and ventilation in addition to sound insultation in areas comprising entertainment noise for the operational stage. The *CEMP* by AWN also sets out additional measures in relation to noise and vibration during construction.

			• Operational noise should be assessed as part of the planning application to determine whether the proposed use of the development will impact on the ambient noise levels of the surrounding environment. Appropriate sound proofing and noise mitigation measure should be provided where necessary.	
	15.18.10		*Air Quality* All developments during construction and operational stage shall ensure that the air quality of the surrounding area is not effected (see also Section 9.5.7). Details of the air quality controls in place throughout construction shall be identified in the construction management plan. As part of the operational management of a proposal, applicants are required to facilitate air extraction / ventilation units and other associated plant and services through the use of internal ducting. Details of such proposals shall be set out in planning applications as part of Mechanical and Electrical Engineering details.	The *Climate Action, Energy & Sustainability Statement* prepared by Delap & Waller notes that the scheme will *"utilise a high efficiency ventilation system to supply clean, fresh air into each dwelling".* The Report also notes that: *"The proposed ventilation strategy for the building will be natural ventilation where possible and/or mechanical ventilation. The mechanical ventilation system will be a high efficiency, variable speed drive system that also incorporates heat recovery and CO2 control."* In order to ensure a consistent supply of fresh air, maintain thermal comfort and minimise the space heating demand, Mechanical Ventilation with Heat Recovery (MVHR) has been proposed within each of the student accommodation clusters. In order to provide additional purge ventilation, all bedroom windows will be manually openable, with restriction, in conjunction with the thermal comfort strategy. The amenity, retail, cultural and community uses will be ventilated via mechanical ventilation with heat recovery, the duty and specification will be sized based on the determined occupancy levels of these spaces. In general, they will be sized in accordance with TGD Part F at 10 litres / second / person. For the purposes of the NEAP assessment at this stage, indicative efficiencies have been used.

	15.18.11		*Ground Investigation* Any development containing significant excavation including the construction of a basement or any development on brownfield lands should include a ground investigation report to be submitted with an application. This will determine the best practice design based on the soil composition. Where lands are considered unstable or infilled, a strategy for the support and or removal of underground lands shall be provided as part of a planning application.	A detailed ground investigation for the site was carried out by Ground Investigations Ireland. The final report is included Appendix I of the *Basement Impact Assessment*. The ground investigation has not identified any areas of unstable land that would need to be addressed.
	15.18.12		*Ground Contamination* Any contaminated land will require appropriate remediation prior to redevelopment, including, in some instances, removal of material from a site which may require a licence under the Waste Management Act, 1996, as amended, prior to the undertaking of such works (see Section 9.5.6). In all cases involving contaminated land, it is the policy of Dublin City Council to require the highest standards of remediation and where appropriate to consult with the Environmental Protection Agency and other relevant bodies to resolve the environmental pollution created by contaminated land. Where the previous history of a site suggests that contamination may have occurred, developers will be responsible for the following: • Undertaking a detailed site investigation, soil testing and analysis to establish whether contamination has occurred.	A comprehensive ground investigation and environmental assessment of the existing site was carried out and is included in Appendix I of the Barrett Mahony *Basement Impact Assessment*. The Waste Classification Report concluded that samples from only one trial pit would be classified as hazardous, while the 'remainder of the material sampled if being considered a waste can be classified as non-hazardous'. All material to be removed from the site will be taken to an appropriate facility for treatment or disposal in accordance with the EPA requirements.

			• Providing a detailed written report of investigation and assessment (including recommendations for treating the affected ground) to Dublin City Council. • The decontamination of sites prior to new development works taking place, and the prohibition of development until Dublin City Council is satisfied that the affected ground has been satisfactorily treated. Decontamination activities should ensure that there is no off-site migration of contaminants via run-off, soils or groundwater.	
	15.18.14		*Flood Risk Management* All applications for developments in flood risk areas shall have regard to the Strategic Flood Risk Assessment of this plan. All applications within flood zones A and B will be required to submit a Site-Specific Flood Risk Assessment to an appropriate level of detail (see Policy SI15 and SI16). Potential applicants should ensure consideration of residual risk without regard to any existing flood protection structures. Dublin City Council will assess planning applications with regard to the vulnerability classes of land-use and development types in accordance with the national guidelines. Potential applicants should refer to these and demonstrate adherence to them. • In relation to rivers, potential applicants should give consideration to potential river	A *Flood Risk Assessment Report* has been prepared and is included with the application documentation. It is noted that the development site is located in Flood zone C, and there are no existing flood protection structures on the site. Therefore, this requirement does not apply.

			channel impacts, adhere to the Inland Fisheries Ireland guidance and ensure access for wildlife to the river where possible.	

Appendix	Section	Policy / Objective Number	Policy / Objective	Comment
3	3.1		*Height* The main determining factor in considering appropriate heights is the need to create exemplar urban development with attractive streets, spaces and public areas that integrate successfully with the surrounding area. The key factors that will determine height will be the impact on adjacent residential amenities, the proportions of the building in relation to the street, the creation of appropriate enclosure and surveillance, the provision of active ground floor uses and a legible, permeable and sustainable layout. At a European level, best practice examples indicate that appropriate density and layouts that create appropriate street scale and enclosure are achieved with mid-rise typologies of buildings 4 to 8 storeys in height. Scope for taller or landmark feature buildings is generally limited to marking key areas of note. At a strategic level, Dublin City has an intrinsic quality as a predominantly low rise city. There is a recognised need to protect conservation areas and the architectural character of existing buildings, streets and spaces of artistic, civic or historic importance. In particular, development proposals must be sensitive to the historic city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter,	Please see Section 8.3.5.2 of this Report which assesses the subject scheme in the context of certain 'performance criteria' relating to building height that is set out in Table 3 of Appendix 3 of the *Development Plan.* In summary, Section 8.3.5.2 of this Report concludes that: "*...it is firmly contended that there is strong merit in supporting the principle of part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 11 No. storeys (above basement level) for Block 2 as part of the redevelopment of the subject site with lower heights proposed to transition between neighbouring constructed / permitted buildings. The layout of the proposed development has comprehensively considered the position of the proposed blocks and open spaces has sought to provide a development that both adheres to local planning policy and exceed minimum policy requirements whilst also assimilating into its receiving environment. It is considered that the design response ensures that the development potential of a strategically positioned underutilised plot is maximised without impacting adversely on the amenity of adjacent properties and the surrounding area.*"

			the historic squares and the canals. It is important to protect the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city and create opportunities for place making and identity. Opportunities for height will be promoted on sites identified in section 4 below and in accordance with the performance criteria set out in Tables 3 and 4.	
	3.2	-	*Density* Appropriate higher density schemes are considered to be ones that combine mixed tenure homes, public space and community infrastructure. This can often be achieved by using building forms of 4 to 8 storeys and in this regard, higher density does not necessarily equate to high rise buildings – see Figure 1 below. High quality design and placemaking are however, the critical factors when developing higher density developments. Sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity. Public transport accessibility and capacity will also determine the appropriate density permissible. A varied typology of units will be encouraged to ensure a diverse choice of housing options in terms of tenure, unit size and design in order to ensure demographic balance in residential communities. All proposals for higher densities must demonstrate how the proposal	Due to the nature of the proposed development providing student bedspaces rather than residential apartments, the prescribed density ranges identified in Table 1 does not apply. Nonetheless, it is considered the proposed high-density scheme of 941 No. student bedspaces at a c. 0.962 Ha site is appropriate given the location of the subject site in proximity to high-quality and high-frequency public transport as well as the unequivocal need to provide much needed student bedspaces in Dublin. The rationale for the proposed plot ratio of 3.2 is provided in the following row. The principle of part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 11 No. storeys (above basement level) for Block 2 as part of the redevelopment of the subject site has been addressed in Section 8.3.5.2 of this Report which responds to each performance criteria set out in Table 3 of Appendix 3 of the *Development Plan.*

contributes to healthy place making, liveability and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods.

As a general rule, the following density ranges will be supported in the city.

Table 1: Density Ranges

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

There will be a general presumption against schemes in excess of 300 units per hectare. Recent research25 has shown that very high density can challenge positive responses to context, successful placemaking and liveability aspirations, sometimes resulting in poor quality development. Schemes in excess of this density will be only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented.

It is acknowledged that schemes of increased density are often coupled with buildings of increased height and scale. Where a scheme proposes buildings and density that are significantly higher and denser than

<table>
<tr><td></td><td></td><td></td><td>the prevailing context, the performance criteria set out in Table 3 shall apply.</td><td></td></tr>
<tr><td></td><td></td><td></td><td>Plot Ratio and Site Coverage

All applications should be accompanied by a calculation of density: units per ha and bed spaces per ha, plot ratio and site coverage. Table 2 below sets out indicative plot ratio and site coverage standards for different areas of the city.
Table 2: Indicative Plot Ratio and Site Coverage
<table><tr><th>Area</th><th>Indicative Plot Ratio</th><th>Indicative Site Coverage</th></tr><tr><td>Central Area</td><td>2.5-3.0</td><td>60-90%</td></tr><tr><td>Regeneration Area</td><td>1.5-3.0</td><td>50-60%</td></tr><tr><td>Conservation Area</td><td>1.5-2.0</td><td>45-50%</td></tr><tr><td>Outer Employment and Residential Area</td><td>1.0-2.5</td><td>45-60%</td></tr></table>
Higher plot ratio and site coverage may be permitted in certain circumstances such as:

• Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed.
• To facilitate comprehensive re-development in areas in need of urban renewal.
• To maintain existing streetscape profiles.
• Where a site already has the benefit of a higher plot ratio.
• To facilitate the strategic role of significant institution/employers such as hospitals.</td><td>The site is considered to be located in a Central and / or Accessible Urban Location as defined in the in the Apartment Guidelines, 2023 having regard to its location beside the Bluebell Luas stop.

"Such locations are generally suitable for small-to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

• Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;
• Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and
• Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors."

The existing site coverage is 29% and it is proposed to increase this by 7%. As detailed extensively throughout this application, the subject site is located within 150 metres of the Bluebell Luas stop, and 150 metres from the closest bus stop, allowing easy access to higher education institutes from the City Edge lands and specifically the subject site. Section 2.3.1 and 2.3.2</td></tr>
</table>

			Any development with a plot ratio over 3.0 must be accompanied by a compelling case.	of this Planning Report provides a summary of the various higher education institutes that are accessed via the Luas or various bus routes from the subject site. The controlled and uncontrolled crossings proposed along Naas Road will also allow easy access to bus stops and Luas stops travelling eastwards. It is our opinion that the location of the proposed student accommodation is unequivocally within an urban location and beside the highest quality public transport. The proposed plot ratio of 3.2 slightly exceeds the indicative figure of 3.0. However, having regard to its location adjacent to high quality public transport, which is supported by the *Apartment Guidelines*, it is considered that the proposed plot ratio is acceptable. There are other constraints on site that has led to a higher plot ratio of 3.2. This includes the daylighting of the River Camac, the positioning of Block 1 & 2 to front the River Camac, and the creation of new public open space. Approximately 76 metres of the River Camac is proposed to be daylighted, taking up 13% of the total site area. In regard to the public open space provision, 3,000 sq m of useable public open space is proposed, taking up 31% of the total site area. It is submitted that the proposed quantum of public open space is to respond to the lack of public open space existing on site, as well as the need to improve permeability through the site by connecting the subject site with the Carriglea site to the south via the Connection Plaza has been designed as a pedestrian priority shared surface, ensuring there is a smooth transitional link between the riparian zone at the subject site and the linear park at the Carriglea site.

	4.1		*The Compact City – How to Achieve Sustainable Height and Density* All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3. The general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, Key Urban Villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development. In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled areas of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height. As a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below. Greater heights may be considered in certain circumstances depending on the site's location and	Performance criteria as per Table 3 have been fully complied with in the proposed development. Please see Section 8.3.5.2 of this Report which assesses the subject scheme in the context the performance criteria relating to building height that is set out in Table 3 of Appendix 3 of the *Development Plan.*

			context and subject to assessment against the performance based criteria set out in Table 3. Key criteria which all proposals for increased urban scale and height must demonstrate include: • The potential contribution to the development of new homes, economic growth and regeneration in line with the compact urban growth principles set out in the NPF and Project Ireland 2040. • Proximity to high quality public transport connectivity, including key public transport interchanges or nodes. • Proximity to a range of employment, services and facilities. • Provision of adequate social and community infrastructure. • The availability of good walking, cycling and public transport infrastructure. • Appropriate mix of uses, housing typologies and tenures. • The provision of high quality public open space and public amenities. • The resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents. • That the ecological and environmental sensitivities of the receiving environments have been adequately assessed and addressed. • Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character. • Adequate infrastructural capacity.	

Appendix 5 - Transport and Mobility: Technical Requirements	2.1	-	The layout for all developments shall seek to maximise pedestrian permeability within the development and to improve pedestrian and cycle linkages to the wider road network, as far as possible. A walkability and/or cyclability audit may be required depending on the location of the development and existing provisions within the local road network. All developments, from one-off housing to large scale mixed use development, shall demonstrate safe vehicular access and egress arrangements. All vehicular access shall be considered, including private car, service, delivery and vehicles, and emergency vehicles, in addition to applicable vehicular access requirements. Where possible, service areas shall be provided within the curtilage of the site to minimise the impact on the local road network. All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS. All planning applications for retail / commercial developments are to include the following: • A place to park adjacent to the building or complex for passengers with disabilities / mobility issues as well as for drivers with disabilities / mobility issues. • Dished or level crossings at all traffic junctions and the use of tactile paving and audible signals, where appropriate. • Parking bays which are sufficiently wide to allow access for wheelchairs.	The proposed path network within the development, combined with the proposed upgrade works outside the site boundaries, will provide greater connectivity between the site and neighbouring areas and developments. New pedestrian linkages will be provided to the Carriglea residential development to the south, as well as to the footpath on the Naas Road. A new pedestrian crossing is proposed across the access road to the development. Similar cycling linkages are proposed as part of the development. Separate walking and cycling audits have been carried out by PMCE Consultants and are included with the application documentation. A *DMURS Design Statement* prepared by Barrett Mahony Consulting Engineers accompanies the planning application. The report demonstrates how the development will be constructed in accordance with DMURS, concluding that the "*design proposals reflect a robust integrated design approach that seeks to deliver safe, convenient and attractive street networks which promote a sustainable community environment.*". Figure 2.1 within the DMURS report demonstrates the various movements for pedestrian, cyclist and vehicle users with the development. Dedicated parking spaces for passengers with mobility issues have been provided within the proposed development, along with the associated dished kerbs and adequate, unimpeded travel routes. The site itself is very flat, with little gradient from one boundary to the other, so there are no issues with excessive gradients on ramps for wheelchair users.

			• A route from a parking place to the building that is level or ramped and unimpeded by steps. • A visible, accessible entrance-way and door to the building – not a separate 'disabled' entrance – which is easy to distinguish and must be under cover (revolving doors and frame-less glass doors are considered to be hazardous). • Sign-posting for the buildings which is legible and well-illuminated, with lettering and numerals on doors at eye level. • Pedestrian routes in open spaces or between buildings which are free from obstructions, pathways which are wide enough for people who use wheelchairs i.e. 2000mm /Irish Wheelchair Association Best Practice Guidelines, and surfaces which are slip resistant. • In the case of changes in level, shallow ramps in addition to steps and stairways which are clearly marked and equipped with handrails. • The careful sitting of bollards, gully gratings and signposts to avoid hazards. • Public toilets for people with disabilities which are sited so that they are accessible and usable. Large scale developments are required to install 'Changing Places' toilets. • Floor surfaces inside the building which are slip-resistant, and where there are changes in level, ramps as well as steps or stairways which are clearly marked. • Where a building is multi-storey, a lift large enough for a wheelchair and a minimum of one other person with controls that are usable from a	

			seated position to serve all main circulation areas which provide facilities. • Clear sign-posting and usability of amenities e.g. lavatories and telephone. • The improvement of access to existing buildings and their surroundings as opportunities arise, through alterations, extensions and changes of use. • An explanation of how surrounding roads, footpaths and sight-lines will be linked. • Illustrations of access to and access within the building itself. • Diagrams showing how people can move to and through the place –including vehicles, bikes and pedestrians. • Description of how levels change within the public spaces, including pavement and dropped kerbs. • Specifications to show that disabled people will not be segregated but will be able to move around within a building at all levels and use the same entrances, corridors and rooms as everyone else without a detour. • Details of how access for the emergency services will be provided. • Where appropriate with a building, sign-posting, illustrations and diagrams to inform the public in accessible formats for people with impaired vision. • Landscape design which takes into account the needs of people with disabilities i.e. pathways should not be encroached upon and the future possibility of low overhanging branches should be avoided. All specimen trees should be selected with consideration for people with disabilities e.g.	

			root damage to surfaces and over-hanging branches etc.	
	2.2		*Transport Assessments* Traffic and Transport Assessments (TTA) and Road Safety Audits will be required for major developments, in accordance with the National Roads Authority (NRA) (now Transport Infrastructure Ireland (TII) Traffic and Transport Assessment Guidelines (2014) and any subsequent review, to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts. Applications which comprise of, but not limited to, the construction of new roads, amendments to existing roads, any project which materially affects vulnerable road users, or any development that generates significant road movements, shall be accompanied by a Road Safety Audit and Quality Audit to assess the existing road network and set out the appropriate traffic management strategy for the new development.	A *Traffic Assessment* report accompanies the planning application. It is also noted that a *Quality Audit* of the scheme proposals have been undertaken, to include: • A Stage 1 Road Safety Audit • A Walking Audit report • A Cycling Audit Report All reports are included with the application documentation.
	2.3		*Mobility Management and Travel Planning* 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	A *Residential Travel Plan,* in addition to a *Parking Management Report,* form part of the planning application documentation. As outlined in these documents, it is predicted that cycling, walking and public transport will be the main modes of transportation for residents and staff of the proposed development.

			will be required to support the zero/reduced provision of car parking to serve a development.	
	2.4		*Service Delivery and Access Strategy* As outlined in Chapter 8 Sustainable Movement and Transport, the city centre and urban villages have limited capacity on the streets to accommodate the wide range of activities generated by existing and new developments. Having regard to this limited capacity, service areas shall be provided where possible within the curtilage of the site. These areas are to be used exclusively for service and delivery vehicles, details of which will be determined by the planning authority. The servicing requirements for any development should be established early in the preplanning process. Swept-path analysis shall also be submitted demonstrating the safe manoeuvrability of all vehicles servicing the site. Where no off-street services or on-street storage can be provided, it shall be a requirement of all new developments to submit full details of all new deliveries, including their time, frequency and manner, to the planning authority. For student accommodation and co-living/shared accommodation, details on how arrivals/departures will be managed shall also be submitted as part of a planning application, as well as detailing how the overall servicing and delivery needs for the multiple residents will be managed for the development.	AWN Consulting Limited has prepared an *Outline Delivery & Servicing Management Plan* (DSMP) for this development. The DSMP assess the quantity, frequency and nature of servicing and deliveries to each area of the development. It identifies the practical logistics of the deliveries and provides a walkthrough and schedule as to how these deliveries will be managed – minimising disruption to neighbouring developments, foot traffic around the development, impact on the local road network etc. Where any logistical obstacles or difficulties have been identified during preparation of the plan, practical mitigation measures have been applied by AWN and the design team to address them. In summary, the DSMP presents an outline servicing and delivery strategy that complies with all legal requirements and best practice guidelines. Section 2.4 of the *Residential Travel Plan* details the proposed arrangement which will be adopted during the period of arrivals and departures at the beginning and end of the college year.

			Where a development is located in close proximity to a Luas line, consideration to the impact of deliveries and services during the operation of the development on the Luas line shall be determined and associated mitigation measures outlined (See also section 9.2 below).	
	2.5		*Car Parking and Cycle Management* Car parking ratios for new developments are dependent on a number of factors in order to deliver a sustainable community. In particular locations, active travel (walking and cycling) infrastructure and provisions to support active travel modes and access to operational high frequency public transport corridors within 10 minutes walking distances are all key components for reduced car parking provision. Other applicable factors include access to services and amenities located within walking distance, high quality shared mobility provision, and service vehicles access and strategy which all seek to minimise the impact on the public transport corridors and other users of the surrounding road network. Access for emergency vehicles, refuse collections and general servicing needs (i.e. domestic/household deliveries) shall be adequately demonstrated. Identifying the location of drop off/pick up areas for deliveries, in particular for car free developments which may be reliant on third party services to meet their household requirements, shall also be considered early in the design process.	Car and bicycle parking management proposals are detailed in the Barrett Mahony *Car & Bicycle Parking Management Plan*, while the predicted modal splits of residents of the development are detailed in the *Residential Travel Plan*. The access and manoeuvring of emergency vehicles, refuse collections and general servicing vehicles are demonstrated on Barrett Mahony drawings GWH-BMD-ZZ-XX-DR-C-1040 and GWH-BMD-ZZ-XX-DR-C-1041 which are included with the application documentation. Two set-down areas are also included as part of the development. The *Car & Bicycle Parking Management Plan* details how the secure bicycle store will be managed by the developments Management Company. Dedicated (and appropriately sloped) ramps have been provided within the stores for ease of access of users. The stores have been segregated into areas of approx. 100 No. spaces, as noted in the Development Plan.

			Where a number of covered and secure bicycle stores are to be provided, consideration shall be given on how access to these stores will be managed for users through the submission of a Bicycle Parking Management Plan. Bicycle stores shall be fully accessible to users of varying ability i.e. the use of ramps/lift access shall be facilitated where possible. The reliance on wheel ramps located on stair cases to access bicycle parking, especially for large residential and commercial developments with zero or reduced car parking provision is not conducive to fully accessible bicycle parking and is discouraged by Dublin City Council. Where large bicycle stores are proposed i.e. in excess of 100 spaces in a single store, consideration shall be given at an early design stage to providing additional measures within these stores where further segregation of bicycle storage could occur e.g. provision of bicycle cages that would hold a smaller number of bicycles and could be effectively numbered/labelled for ease of use. The management of bicycle parking should also detail how access to stores for cargo bikes and adapted bikes will be facilitated.	

	3.1		**Table 1: Bicycle Parking Standards for Various Land Uses** See table below	The provision of bicycle parking spaces within the development is detailed in the Barrett Mahony *Residential Travel Plan*. In summary, 1,159 No. bicycle parking spaces have been provided in total, comprising 941 No. dedicated spaces for student residents, 189 No. spaces for student visitors, 8 No. Spaces for the retail and 21 No. spaces for the cultural / community uses. 3 No. additional internal cycle spaces are provided for staff of the retail / cultural / community uses. This exceeds the requirement of the Development Plan.
	4.0		*Car Parking Standards* Residential parking spaces are mainly to provide for car storage to support family friendly living policies in the City. It is not intended to promote the use of the car within the City. If the car space is not required in the short-term, it should be given over to other residential storage or utility uses. **Table 2: Maximum Car Parking Standards for Various Land Uses** See table below	The provision of car parking spaces within the development is detailed in the Barrett Mahony Consulting Engineers *Residential Travel Plan*. In summary, 7 No. car parking spaces have been provided in total. This is within the maximum standards allowed for in the *Development Plan.*

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

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
	Other Retail and Main Street	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
	Retail			

	5.0		*Electric Vehicles (EV)* All new developments must be futureproofed to include EV charging points and infrastructure. In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications.	It is proposed that 5 No. of the 7 No. spaces provided (or 71%) will be equipped with charging stations, and the other two will have provision for future stations. This will exceed the requirement stated in the DCC development management standards for 50% of all on-site car parking spaces to be fitted with EV charge points.
	6.0		*Motorcycle Parking* New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided. Motorcycle parking areas shall have limited gradients to enable easy manoeuvrability and parking. Fixed and robust features such as rails, hoops or posts should be provided to secure a motorcycle using a chain or similar device.	It is proposed that 2 No. motorcycle parking spaces will be provided within the development. This exceeds the requirement of 5% of the number of car parking spaces as required in the *Development Plan*. The parking spaces are provided at level areas which will facilitate easy manoeuvrability.
	8.1		*Design Criteria for Car Parking* The car parking standards in Table 2 and the associated circulation and manoeuvring space must be provided within the curtilage of the building, clear of the carriageways and footways, whether public or private, giving access to the premises. The basic dimensions required for the layout of commercial car parking shall be 2.5m wide by 4.75m in length.	The typical manoeuvring of a standard car is indicated on Barrett Mahony drawing GWH-BMD-ZZ-XX-DR-C-1041. Standard parking sizes have been provided in the site layout, and the parking bays for individuals with disabilities are in accordance with the requirements under Part M of the Building Regulations.

			Parking bay widths for people with accessibility requirements shall be in accordance with the requirements under Part M of the Building Regulations (2010) and any subsequent review.	
	8.2		*Road and Footpath Standards* All roads and footpaths within developments shall be constructed to Taking-in-Charge standards. Dublin City Council sets out construction technical standards and specifications in Construction Standards for Road and Street Works in Dublin City Council (2020) and any subsequent review. Any works proposed to alter or amend existing public footpaths / roadways must be agreed with the planning authority at an early stage in the pre-application process. A letter of consent may be required from the Environment and Transportation Department for these works and submitted with the planning application which details the proposed amendments to the public footpath or roadway.	The proposed upgrade works to the existing access road, along with the proposed works to the footpath along the outbound carriageway of the Naas Road, will be constructed in accordance with the Construction Standards for Road and Street Works in Dublin City Council.
	8.3		*Taking in Charge* All areas to be taken in charge by Dublin City Council shall be maintained free of development both above and below ground. No part of a development shall overhang and no basements should extend under footpaths, roads and areas of public realm if these areas are intended to be taken in charge by the Road Maintenance Services Section of Dublin City Council. Where an existing overhang is already permitted, the	The areas which are proposed to be taken-in-charge are indicated on Barrett Mahony drawing GWH-BMD-ZZ-XX-DR-C-1007 which is included with the application documentation. There are no areas included on the drawing which feature overhangs or basements. All areas which are proposed to be taken in charge will be constructed in accordance with the Construction Standards for Road and Street Works in Dublin City Council.

			development will be assessed on its merits on a case by case basis. Planning applications comprising of areas to be taken in charge shall be accompanied by a taken in charge site layout plan at a scale of 1:500 which indicates the area of the site sought to be taken in charge. The details and specification of the road and footpath layout of these areas should be set out as part of the planning application.	
Appendix 9: Basement Development Guidelines	3.0		The purpose of the Basement Impact Assessment is to identify potential impacts, short and long term; to inform whether a proposed basement is acceptable; and to identify whether appropriate mitigating measures can be incorporated. It must also demonstrate: • That the construction of the basement will not unduly impact on groundwater conditions and that groundwater quality, quantity and classification will be protected. • That groundwater or surface water flows will be not be impacted on to the extent that there is likely to be an increase in the risk of flooding. • That the basement development will not increase groundwater infiltration into existing sewers and drains beyond permitted levels. • That the basement development will not have an adverse effect on existing patterns of surface water drainage, including infiltration into groundwater and is consistent with best practice in SuDS.	A *Basement Impact Assessment* is included with the application which addresses all of these points.

			• That the structural stability/integrity of adjoining and neighbouring buildings will not be compromised. • That the design of the basement relates to the characteristics/proportions of the site. Domestic basements, save for exceptional circumstances, should not exceed the footprint of the original building and be no deeper than one storey below ground level. They should generally not extend to more than 50% of the amenity/garden area. • That the basement has been designed to an appropriate standard and will be constructed in accordance with a detailed Construction Management Plan during the excavation and construction stages and that an appropriate suite of mitigation measures are proposed to address potential adverse impacts. • That the construction of the basement will not cause undue nuisance to the residential amenities of existing communities and will not adversely impact on the built and natural environment. • That the design of the basement considered impacts on future planting including trees and where possible, enhances the biodiversity value of the site. • That the basement development will not adversely impact on existing protected structures, heritage sites, conservation areas or sites of archaeological interest. The City Council in general does not support the construction of basements in close proximity to protected structures. However, in instances where this is proposed, the applicant must demonstrate that the basement	

			construction will have no adverse impact on the structural stability of this structure, including at excavation/construction stage e.g. vibration, settlement. • That the design of the basement provides for adequate ventilation; a suitable means of escape to a place of safety at the external ground level and that depending on the intended use of the basement accommodation, adequate sunlight/daylight penetration is provided. The design should be compliant with all relevant building regulations.	
	4.1		Baseline Characteristics of the Project This will include details such as: • Development extent and description. The BIA should provide details of the retaining wall and basement design for the basement excavation. Details should be provided regarding all temporary and permanent works including where piles and ground anchors or similar are proposed to be used. • A plan showing the site location and boundary of the development including land required temporarily during construction. • Maps and photographs showing the location of the project relative to surrounding buildings and structures, topography, protected structures and man-made features. • An assessment and description of the ground conditions, surface water and groundwater regime including groundwater levels and history of any previously built infrastructure on the site of the	The Baseline Characteristics of the project are included in section 2 of the *Basement Impact Assessment*.

<table>
<tr><td></td><td></td><td></td><td>proposed excavation including the potential for contamination.
• Schematic and details of the water table level and groundwater flow direction (conceptual site model during construction phase and in the longer, post-construction phase).
• A work programme for construction, operation and commissioning phases and restoration and after use where appropriate.
• Construction methods including any temporary/permanent works.
• Details of any other permits required.</td><td></td></tr>
<tr><td></td><td>5.0</td><td></td><td>Basement Impact Assessment – Submission Checklist

Table 1</td><td>The basement impact submission checklist is included on section 5.3 of the Basement Impact Assessment.</td></tr>
<tr><td>Appendix 11 - Technical Summary of Green & Blue Roof Guide (2021)</td><td>2.2</td><td></td><td>Green Blue Roof Requirement 2 – Areal Coverage

Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application.

The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.

Table 1: Green Blue Roof Minimum Coverage
<table><tr><th>Type of green roof</th><th>Minimum coverage
(% of total roof area being developed)</th></tr><tr><td>Extensive</td><td>70%</td></tr><tr><td>Intensive</td><td>50%</td></tr></table></td><td>Green and blue roofs are provided for within the development. Please refer to Barrett Mahony Consulting Engineers Civil Engineering Infrastructure and Surface Water Management Report and relevant drawings. Both extensive and intensive green roofs are being provided, and the combined provision exceeds DCC's minimum coverage of 70% / 50 %.</td></tr>
</table>

			The percentage coverage is considered to make a reasonable allowance for the provision of overruns, roof lights, fire breaks, service penetrations and hard landscape.	
	2.3		*Green Blue Roof Requirement 3 – Hydraulic Operation* The design of green blue roofs will make provision for suitably sized emergency / exceedance overflow(s).	For preliminary details of the green blue roof, refer to Barrett Mahony drawing GWH-BMD-ZZ-XX-DR-C-12310
	2.4		*Green Blue Roof Requirement 4 – Use* The design of the green blue roof should maximise biodiversity and / or amenity benefits. Green blue roof designs should be designed to ensure that any amenity use (e.g. use as communal open space) can be facilitated without effecting storage capacity or drainage function of the green blue roof.	For preliminary details of the green blue roof, refer to Barrett Mahony drawing GWH-BMD-ZZ-XX-DR-C-12310. Where amenity use is proposed, the green roofs will be designed as intensive green roofs and will be robust enough to endure the anticipated usage without impacting the storage or drainage functions.
Appendix 12: Technical Summary of Dublin City Council Sustainable Drainage Design & Evaluation Guide (2021)	3.1		*SuDS Requirement 1 – Runoff Destination* The following methods of utilising or releasing rainfall run-off from development are set out in order of preference: i) Use surface water run-off as a resource. ii) Provide interception of rainfall through the use of nature based SuDS approaches. iii) Where appropriate, infiltrate run-off into the ground. iv) Discharge to an open surface water drainage system. v) Discharge to a piped surface water drainage system	The approach to storm water management for the development, including the SuDS proposals, are detailed in section 2 of the Barrett Mahony *Civil Engineering Infrastructure and Surface Water Management Report* which is included with the application documentation.

			vi) Discharge to a combined sewer. Discharging run-off from a site may utilise one or more means of discharge. Full advantage should be taken of each method of discharge on the list in turn, prior to considering the next sequential option.	
	3.2		*SuDS Requirement 2 – Hydraulic Control* Surface run-off from new development will be restricted to 2l/s/ha for the 1 in 100 year rainfall event (with allowance for climate change and urban creep) where surface water leaving the site: • Poses a pollution risk to the environment arising from (overflow from a combined sewer to a receiving watercourse); • Has the potential to impact upon property or infrastructure (where property or infrastructure is identified as being at flood risk from a 1 in 100 year flood / rainfall event). In all other instances, the following criterion tabled below shall apply:	The surface water run-off from the proposed development will be restricted to 2 l/s (for a site of just under 1 ha), while allowance has been made in the civil design calculations for climate change and urban creep. The approach to criterion 1 to 4, as noted, are detailed in section 2 of the Barrett Mahony *Civil Engineering Infrastructure and Surface Water Management Report* which is included with the application documentation.

Table 1: SuDS Requirements

Criterion	Sub-criterion	Return Period (Years)	Design Objective
Criterion 1 River Water Quality Protection	1.1	<1	Interception storage of at least 5mm, and preferably 10mm, of rainfall where run-off to the receiving water can be prevented.
Criterion 2 River Regime Protection	2.1	1	Discharge rate equal to 1-year greenfield site peak runoff rate or 2 l/s/ha, whichever is the greater site critical duration storm to be used to assess attenuation storage volume.
	2.2	100	Discharge rate equal to 1 in 100 year greenfield site peak run-off rate. Site critical duration storm to be used to assess attenuation storage volume.
Criterion 3 Level of Service (Flooding) for the Site.	3.1	30	No flooding on site except where specifically planned flooding is approved. Summer design storm of 15 or 30 minutes are normally critical.
	3.2	100	No internal property flooding. Planned flood routing and temporary flood storage accommodated on site for short high intensity storms. Site critical duration events.
	3.3	100	No internal property flooding. Floor levels at least 500mm above maximum river level and adjacent on-site storage retention.
	3.4	100	No flooding of adjacent urban areas. Overland flooding managed within the development.
Criterion 4 River Flood Protection (Criterion 4.1, or 4.2 or 4.3 to be applied)	4.1	100	"Long-term" floodwater accommodated on site for development run-off volume which is in excess of the greenfield run-off volume. Temporary flood storage drained by infiltration on a designated flooding area brought into operation by extreme events only. 100 year, 6 hour duration storm to be used for assessment of the additional volume of run-off.
	4.2	100	Infiltration storage provided equal in volume to "long term" storage. Usually designed to operate for all events. 100 year, 6-hour duration storm to be used for assessment of the additional volume of run-off.
	4.3	100	Maximum discharge rate of QBAR or 2 l/s/ha, whichever is the greater, for all attenuation storage where separate "long term" storage cannot be provided.

	3.3		*SuDS Requirement 3 – Water Quality* SuDS designs will demonstrate sufficient number of SuDS techniques which are sufficiently sized to manage and remove pollution, to provide protection of groundwater, surface waters and sensitive coastal waters. The SuDS design will demonstrate that water is suitably cleansed prior to entry to SuDS components that are intended for amenity use and biodiversity benefit. Preference should be given to SuDS techniques which generate interception losses.	The approach to storm water management for the development, including the SuDS proposals, are detailed in section 2 of the Barrett Mahony C*ivil Engineering Infrastructure and Surface Water Management Report* which is included with the application documentation.
	3.4		*SuDS Requirement 4 – Amenity* Designs should seek to generate amenity benefits using SuDS, through the creation of multi-functional places and landscapes.	The approach to storm water management for the development, including the SuDS proposals, are detailed in section 2 of the Barrett Mahony *Civil Engineering Infrastructure and Surface Water Management Report* which is included with the application documentation.
	3.5		*SuDS Requirements 5 – Biodiversity* Designs should seek to generate biodiversity benefits using SuDS.	The approach to storm water management for the development, including the SuDS proposals, are detailed in section 2 of the Barrett Mahony *Civil Engineering Infrastructure & Surface Water Management Report* which is included with the application documentation.

9.0 CONCLUSION

The enclosed information provides a preliminary design proposal for the Gowan Motors site on the Naas Road. The proposed development would provide much needed students accommodation in a suitable and accessible location. Some 941 No. student bedspaces are proposed within 2 No. blocks of part 2 No. storeys to part 15 No. storeys (above lower ground floor and basement level) for Block 1 and part 9 No. storeys to part 11 No. storeys (above basement level) for Block 2, as well as 5,201 sq m of amenity space, 1,533 sq m of cultural/community space, 3,000 sq m of useable public open space and 1,261 sq m of a riparian zone provided via the daylighting of the river, and a 250 sq m of retail unit, on the site measuring 0.926 ha.

As is well documented in the media and National Policy, Ireland is experiencing an acute housing crisis where the level of demand is significantly higher than housing supply which has had consequential impacts on the cost and availability of housing. The proposed development will contribute positively towards addressing the national critical shortage in student accommodation supply and should free up private rented accommodation being utilised by students.

Having regard to both the urgent demand for student accommodation bedspaces in Dublin City and the pattern of development in the surrounding area, which is undergoing intensive regeneration, it is considered that the subject development is an appropriate use for the site and is an appropriate scale, height and form.

We trust you will find this application in order. Please do not hesitate to contact the undersigned should you require any further information or clarification on the proposal.

Yours faithfully,

Patricia Thornton

Patricia Thornton
Director
Thornton O'Connor Town Planning