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MCGILL PLANNING

PLANNING REPORT

INCLUDING:
STUDENT ACCOMMODATION JUSTIFICATION REPORT;
SOCIAL AND COMMUNITY INFRASTRUCTURE AUDIT;
RESPONSE TO LRD OPINION;

STATEMENT OF CONSISTENCY

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) COMPRISING STUDENT ACCOMMODATION AT THE FORMER GOWAN MOTORS COMPOUND SITE, 169-177 MERRION ROAD, DUBLIN 4.

Prepared by MCG Planning
on behalf of 1 Merrion Compound Land Limited
SEPTEMBER 2024

Contents

INTRODUCTION

McGill Planning Limited, Iconic Offices, 9 Pembroke Street Upper, Dublin 2 is instructed by the Applicant 1 Merrion Compound Land Limited to submit this Large-Scale Residential Development LRD application to Dublin City Council under Section 32D of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 for a proposed Large Scale Residential Development comprising Student Accommodation at the former Gowan Motors Compound site, 169-177 Merrion Road, Dublin 4.

The application has been prepared by a multidisciplinary team. This includes MDO Architects, NMP Landscape Architects, TENT Consulting Engineers, Global Apartment Advisors, Tree management Services, Altemar, ARUP, Molloy and Associates, IAC, Fallon Design, and 3d Design Bureau.

This planning report is set out as follow:

- Section 2 describes the site location and context.
- Section 3 provides a Social Infrastructure Audit
- Section 4 details the Planning History for the subject site
- Section 5 outlines the Rationale and Details of the Proposed Development
- Section 6 sets out the Student Accommodation Justification
- Section 7 set out of the response to the S32B Pre- Planning meeting and DCC LRD Opinion
- Section 8 assesses the development against National, Regional and Local Planning Policy
- Section 9 concludes the report

DEVELOPMENT STATISTICS

Development	Site Statistics
Site Area	0.28ha
Unit Mix	200 Student Units within 32 clusters
Residential Amenity Space	Total provision 1,232.88 sq.m comprising: - Outdoor Communal Space: 820 sqm (including Basketball Practice Hoop, Outdoor Gym Equipment and Communal Lawn / Seating Area) - Indoor Communal Space: 412.88 (Including Reception Area, Lobby, Parcel and Laundry Room, Student Residents' Lounge, Co-Working Space, Multi-Purpose Gym/Studio)
Density	177 uph (as per Section 3.2.1 (footnote 3) of the Sustainable & Compact Guidelines for Planning Authorities, 2024, which states *"When calculating net densities for shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling.")*
Plot Ratio	0.5:1
Site Coverage	50%
Building Height	1 - 6 storeys
Car Parking	2 no. car spaces - 1 accessible space - 1 set-down space
Cycle Parking	248 no. bike spaces - 206 no. long term spaces - 42 no. short term spaces

	** Of which 5% is non-standard bike parking equivalent to 12 parking spaces distributed across the site.*

SITE LOCATION AND DESCRIPTION

The subject site is located along Merrion Road c. 4.1km southeast of Dublin City Centre on a site area of c. 0.28ha. The site is bounded to the north by Merrion Road with residential units on the opposite side of the Merrion Road, to the east by residential dwellings (bungalows) which also front onto Merrion Road and are protected structures, to the south by Caritas Convalescent Centre and St. Marys Nursing Centre to the south east and to the west by a 4 storey apartment block known as 'Elm Court'.

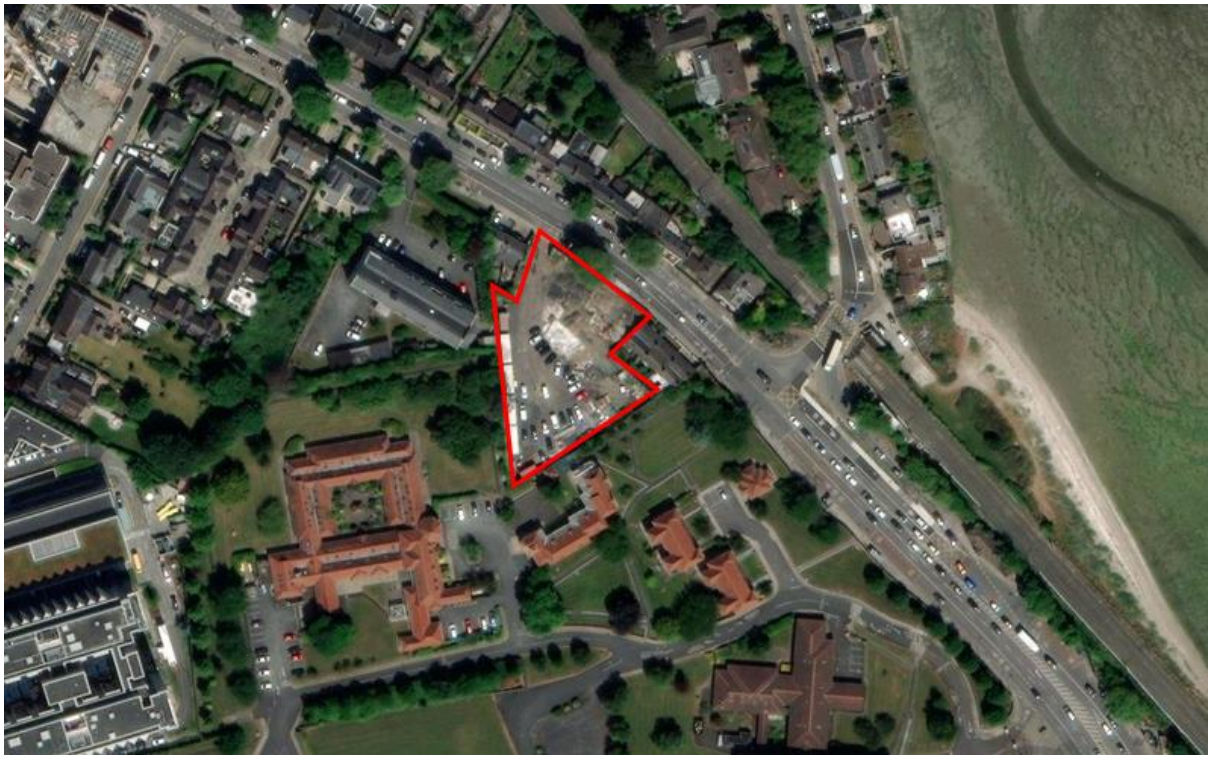


Figure 1- ArcGIS (Source: Google 2024)

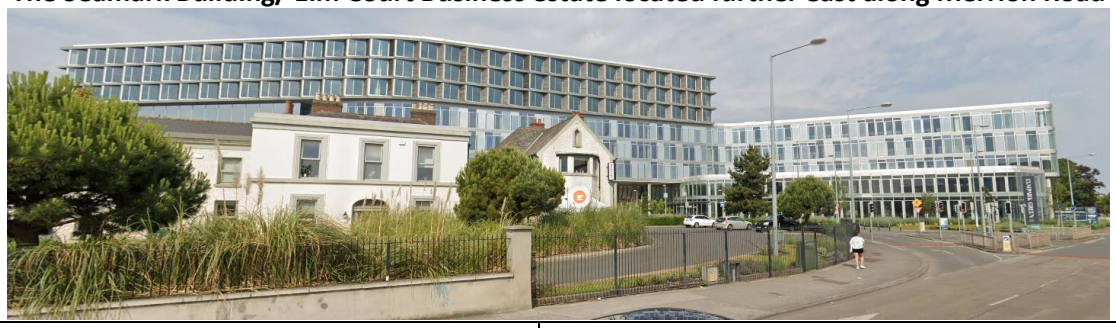
The area surrounding the subject site has undergone significant change in the last decade with numerous large scale, modern tall buildings built within the vicinity of the site. The surrounding area comprises a range of uses such as commercial, residential, and medical uses. Immediately to the east, north and west of the site is residential, while to the south is Caritas nursing home. Within proximity of the site is Elm Park Business Centre c. 295m to the east, St. Vincent's Hospital is located c. 250m to the west and Merrion Strand is to the northeast of the site c. 150m. It is also within 500m of Merrion Village.

Currently, the site has been cleared and all demolition work has been completed in line with the permitted development DCC Reg. Ref. 4477/19 and 4051/21. The site has three vehicular accesses off Merrion Road, one into the previous Gowan Car Compound and the other two into the drives of the semi-detached properties at 175 and 177.

There are excellent public transports services that operate in the surrounding area with Sydney Parade Dart Station located c. 900m or a 10-minute walk away (or 570m as the crow flies). Dublin Bus services 4, 7, 7A, 7E and 84A operate along Merrion Road with a stop located directly north of the subject lands. These connect the site to Dublin City Centre, Monkstown, Brides Glen, Bray, Greystones and Mountjoy.

The site does not contain any protected structures or buildings of architectural merit as per the National Inventory of Architectural Heritage. The nearest protected structures are a terrace of 3 bungalows which adjoin the subject site to the northeast fronting onto Merrion Road. Equally the site is not located within or adjoining an Architectural Conservation Area or Zone of Archaeological Potential. There are no Tree Preservation Orders on the site and no protected views from adjoining roads across the site. The site is not located within a flood risk zone.

Table 1 Views of properties within the immediate vicinity

<table>
<tr><td>Bungalows adjoining the subject site
  </td><td>Dwelling directly adjacent on Merrion Road
  </td></tr>
<tr><td colspan="2">The Seamark Building/ Elm Court Business estate located further east along Merrion Road
  </td></tr>
<tr><td>St. Mary’s Nursing Centre
  </td><td>Elm Court Apartment Block to the west
  </td></tr>
</table>

Maldron Hotel to the south	145 Merrion Road to the north
	

SOCIAL AND COMMUNITY INFRASTRUCTURE AUDIT

This section of the report will assess the Social & Community infrastructure in the area which includes a range of services that contribute to the quality of life of residents of an area. They form a key element for the fabric of the area in terms of the social, physical, and mental wellbeing of a community.

This study is informed by a set of inventories that assess the availability and quality of services for the proposed Purpose-Built Student Accommodation in relation to community facilities, healthcare, retail and recreation. The services and facilities within a 1km and 2km buffer of the site have also been mapped.

This Social and Community Infrastructure Audit has been prepared in response to Table 15.1 of the Dublin City Development Plan 2022-2028 which states:

"Community facilities, such as local parks and playgrounds, community centres, local hubs, schools, childcare are an integral component of a successful neighbourhood. 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."

Demographic Profile

The subject site is located within the Pembroke East C Electoral Division. Throughout this audit a 1km is used to determine social and community facilities within the surrounding area of the site. Five electoral divisions are within a 1km buffer of the subject site. These electoral divisions are Pembroke East C, Pembroke East D, Pembroke East E, Blackrock-Glenomena and Blackrock-Booterstown.

Table 2 Study area compared to Dublin and Ireland population changes

	2016 Population	2022 Population	Population Change 2016-2022	Percentage Change 2016-2022
Study Area	18,604	19,100	+496	2.6%
Dublin	1,347,359	1,458,154	+110,795	8.2%
Ireland	4,761,865	5,149,139	+387,274	8.13%

The total population of the Local Catchment Area is 19,100 persons which was established from the CSO Census Data 2022. This is a 2.6% increase from the 2016 CSO Census Data. This is a significantly lower population increase compared to the nation and Dublin average. The census date shows that the population of Ireland increased by 8.13% from 2016-2022 to a total population of 5,149,139.

Table 3 Study area population statistics

Age	2016	2022	Change	Percentage Change
0-4	952	882	-70	-7.4%
5-19	2488	2805	+317	12.7%
20-34	5075	4975	-100	-1.9%
35-64	6807	6816	+9	0.13%
65+	3282	3622	+340	10.3%

The 2022 census shows us that within the study area 4.6% of the residential population were aged between 0-4, or a total of 882 children. A further 2,805 persons are aged between 5 and 19 years old or 14.6% of the total population. The 20 to 34 years old cohort comprises 4,975 persons or 26.04% of the total population. The 35-64 age group comprised of 6,816 persons which is 25.68% of the 2022 Local Catchment area. The remaining 3,622 (18.9%) persons were aged 65+ within the Local Catchment Area in 2016.

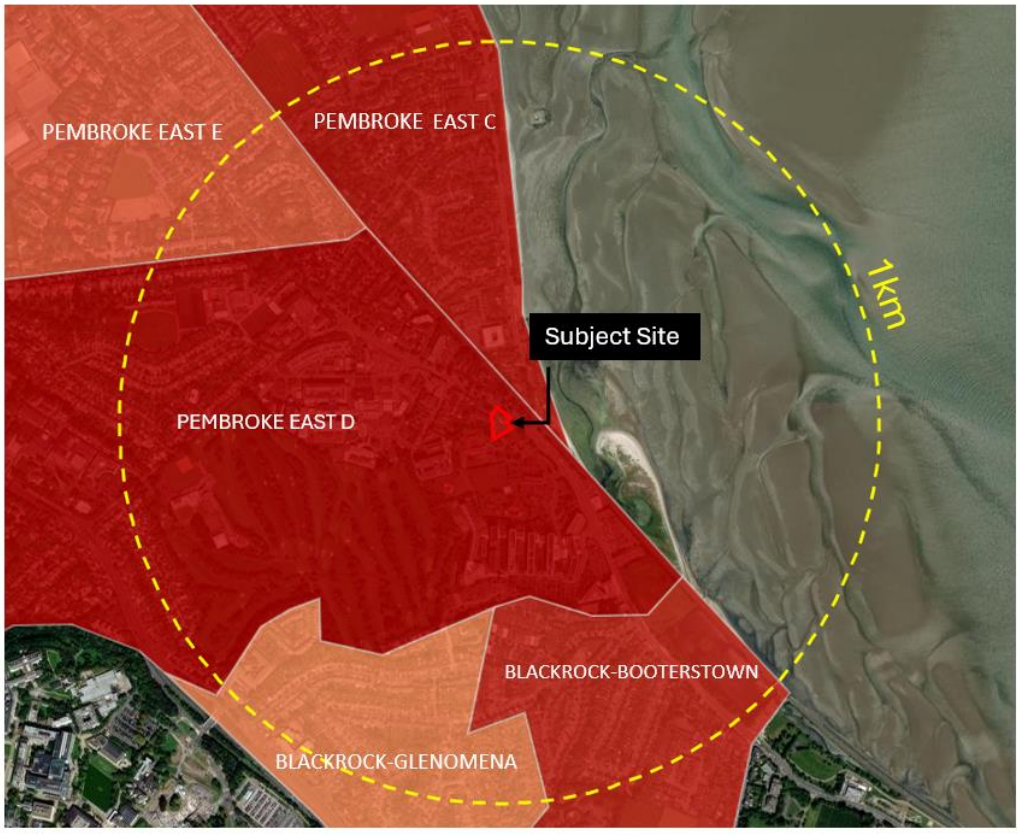


Figure 1 Study area with a 1km boundary.

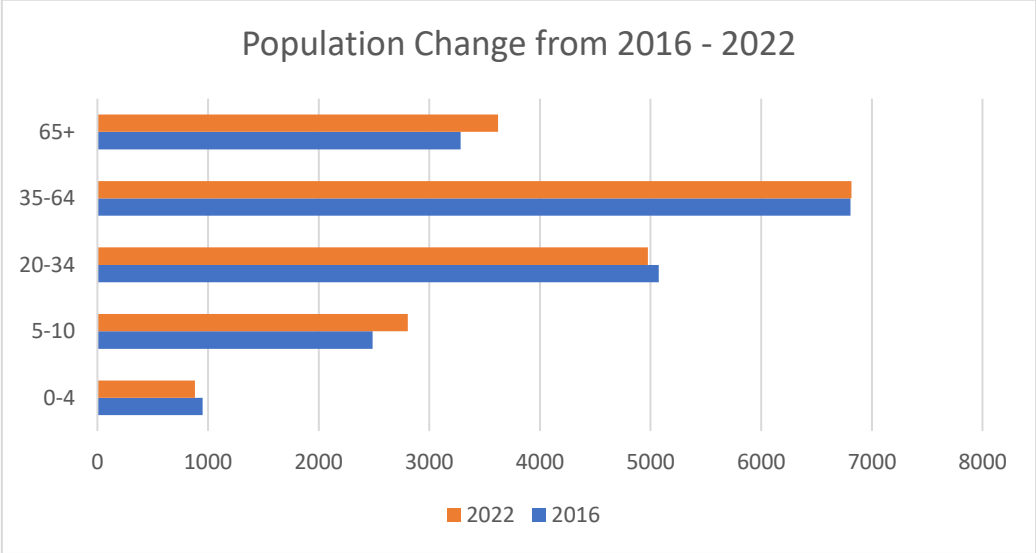


Figure 2 Population change within the study area

Table 4 Study area population percentages compared to the Dublin and National standards

Age	Study Area Population 2022	% of Study Area	% of Dublin	% of National
0-4	882	**4.6%**	5.6%	5.7%
5-19	2,805	**14.6%**	19%	20.5%
20-34 Adults	4,975	**26.04%**	22.4%	18.2%
35-64 Adults	6,816	**35.6%**	40%	40.6%
65+ Adults	3,622	**20%**	13.4%	15.1%

Assessment of Existing Community Facilities

This Social and Community Infrastructure Audit assesses a range of services and facilities that would be expected in a community, conducive to enabling a high-quality standard of living for the existing and future residents, whether they are students, home owners or renters. This audit will address key themes that constitute community facilities as outlined below. The themes will be analysed with regard to their context within the defined study area, with several varying buffer radii from the subject site.

The majority of the facilities are within 1 km from the site. This area is generated by a 1km "as the crow flies" buffer zone. It is worth noting that while the majority of the audit identified infrastructure within 1 km of the subject site, some facilities extend just beyond this range into 2km.

Table 5 Categories considered for the Social and Community Infrastructure Audit

Category	Description
Health Services	GPs, Pharmacies, Health Centres, Hospitals
Open Space / Sports and Recreation	Parks, Pitches, Residential Green Areas, Playgrounds
Retail Services	Supermarkets, Convenience Shops, Speciality Services, Restaurants/Takeaways, Pubs
Community/Cultural Facilities	Community Centres, Libraries, Theatres, Museums/Galleries, Concert Halls, Memorials, Religious Facilities

The walking time map below identifies the areas that can be reached within a 5, 10, 15-minute walk from the subject site.

Figure 3 Isocrome walking distances and 1km as the crow flies distance

Health Care Facilities

There are numerous General Practitioners, Pharmacies, Dentists and other health related services available within a 1km distance of the subject site. This site is also within 250m of St Vincents Hospital where it is envisaged that many of the students will study.

Table 6 Health Care Facilities

No. on Map	Health Facility	Location
General Practitioner		
1.	Merrion Gates Medical Centre	240 Merrion Road
2.	Lowell Medical	Lowell House, 23 Herbert Avenue
3.	Dr. Lisa Fay	6 Merrion Court, Merrion Road
4.	Woodbine Medical Centre	31 Woodbine Park, Booterstown
Pharmacies		
5.	Pharmacy Merrion Centre Ltd	Merrion Shopping Centre
6.	Pharmacy Department, St. Vincent's Hospital	St Vincents University Hospital
Dental		
7.	Merrion Road Dental	Lowell House, Herbert Avenue
8.	South Dublin Dental	3 Seafield Park, Booterstown
9.	Ailesbury Dental Practice	3 Seafield Park, Booterstown
Physiotherapy		
10.	John Lee Physiotherapy Clinic	2 Trimleston Ave, Booterstown
11.	Dr. Grant Physiotherapy	2 Seafield Park, Blackrock
Hospital		
12.	St. Vincent's University Hospital	Merrion Rd, Dublin 4

Figure 4 Health care facilities

Open Space and Recreation

There are a wide variety of playing fields and leisure facilities established in the 1km of the subject site. The subject site will benefit from the coastal walks along Sandymount Beach and the large Elm Park Golf and Sports Club. Just outside of the 1km exists the UCD Campus which comprises a wide range of walks and sports facilities.

No. on Map	Open Space and Sports Facility	Location
1.	Elm Park Golf and Sports Club	Nutley Lane
2.	Booterstown Nature Reserve	Rock Road, Booterstown
3.	Merrion Strand	Merrion Strand, Merrion Road
4.	Sandymound Beach	Strand Road
5.	Sydney Parade Cricket Ground	Park Avenue

Table 7 Open space and recreation facilities

Figure 5 Open space and recreation facilities

Retail and Commercial

The subject site is easily accessible to a range of retail and entertainment services along Merrion Road and the surrounding area. Surrounding areas include for neighbourhood centres and larger Shopping Centres. The close distance of Dublin City Centre and the general requirement of critical mass allows for a wide range of retail facilities, services, entertainment options to form around the core of the town.

At present the site benefits from the Merrion Shopping Centre which includes a Tesco Superstore, a Pharmacy, Hairdressers, a Barbers, numerous coffee shops and smaller retail outlets. within 1km of the subject site.

Table 8 Retail and commercial facilities

No. on Map	Retail and Commercial	Location
1.	The Merrion Shopping Centre	Merrion Road
2.	Cirkle K	Merrion Village, Merrion Road
3.	Woodbine Neighbourhood Centre	Woodbine Park, Priesthouse
4.	Montrose Neighbourhood Centre	Montrose, Stillorgan Road
5.	Centra Merrion Gates	Texaco Service Station, Merrion Rd

Figure 6 Retail and commercial facilities

Community Centres, Cultural and Religious Facilities

The subject site's surrounding area has an extensive network of community facilities and places of worship. Whilst many of these community facilities are within close proximity to the subject site, some of these lies within the 2km buffer zone (as highlighted in blue below) which is still considered a reasonable walking distance. It is also close to Blackrock town centre which is just over 2.2km away which provides additional community and cultural facilities. Furthermore, Dublin City Centre is within half an hour by public transport or cycling.

No. on Map	Community Centres, Cultural and Religious Facilities	Location
1.	Our Lady Queen of Peace Church	230 , Merrion Road
2.	St John the Evangelist Church of Ireland	St. John's Road, Sandymount
3.	Church of the Sacred Heart	Stillorgan Rd, Donnybrook
4.	St Thomas' Church of Ireland	Foster Ave, Mount Merrion
5.	Church of the Assumption	Booterstown Avenue
6.	South Hill Evangelical Church	South Hill Park, Booterstown Avenue, Merrion
7.	Booterstown Parish Pastoral Centre	Booterstown Avenue
8.	Donnybrook community youth club	4a Belmont Avenue, Donnybrook
9.	Donnybrook Garda Station	43 Donnybrook Rd

Table 9 Community centres, cultural and religious facilities

Figure 7 Community, cultural and religious facilities

Conclusion

The Social and Community Infrastructure Audit has demonstrated that the subject site is located in close proximity to a range of facilities that will meet the needs of future residents of the proposed development. In particular it is close, within c. 250m, to St Vincent's University Hospital which is a teach hospital and it is expected that the majority of students residing in this proposed development will attend this teaching hospital. It is also c. 2.1km of University College Dublin.

The proposed development will generate a demand on the existing services and facilities, such as public open space and natural amenities and has ease of access to large open spaces such as Sandymount Strand. The site is also well located in relation to community facilities with a wide range of clubs and amenities being located in the surrounding areas.

The subject site is also well served by healthcare facilities within a short distance from the site. In addition, there are an extensive range of GP clinics and pharmacies located in the area which will serve the needs of future residents at the subject site.

There are excellent retail provisions in the area including Merrion Shopping Centre, along with public houses and restaurants. It is also noted that the site is c. 2.2km from close to Blackrock town centre which also has a wide range of restaurants, retail facilities, open spaces and recreational facilities.

This Social and Community Infrastructure Audit has highlighted a need for more community, cultural, and arts facilities in the immediate area. It is noted, the site is c. 2.2km from Blackrock and also within 30 minutes of Dublin City Centre both of which have a wealth of community and cultural facilities. The proposed student accommodation is expected to contribute positively by fostering social benefits, including increased cultural diversity and vibrancy, which can, in turn, support the growth of community, cultural, and arts activities in the area.

The study area's modest population increase of 2.6% suggests there is capacity for further growth. Given that this growth rate is below the national average, the addition of the proposed Purpose-Built Student Accommodation (PBSA) is unlikely to strain existing services and amenities.

The proposed PBSA is expected to positively impact the overall demographics of the area, as the study area currently has a high elderly population (65+) at 20%, which is significantly above the averages for Dublin and nationally. Introducing student accommodation would help rebalance the age profile, bringing more diversity and vibrancy to the community.

Therefore, it is submitted that the current provision of social services and community amenities in the Merrion Area can accommodate the future residents.

PLANNING HISTORY

Planning History

Previously approved planning applications on site are listed below:

DCC Reg. Ref:	4051/21
Decision:	Granted Permission with 11 conditions
Description:	The development is an amendment application to DCC Reg. Ref 4477/19 for 46 no. residential units ranging up to 6 storeys in height.

Figure 8 Permitted site layout

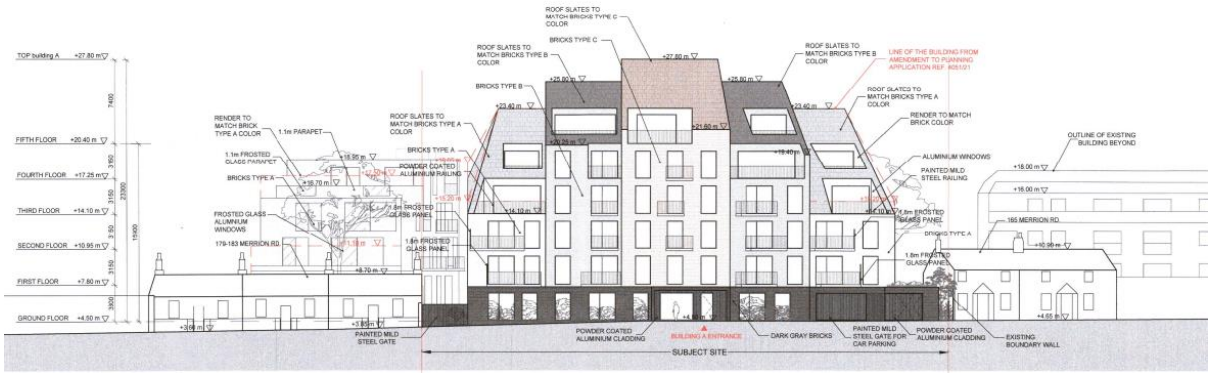


Figure 9 Permitted elevation of Block A

DCC Reg. Ref:	4477/19
Decision:	Granted Permission with 27 conditions
Description:	The development was for 43 no. residential units ranging up to 5 storeys in height.

Figure 10 Permitted site layout

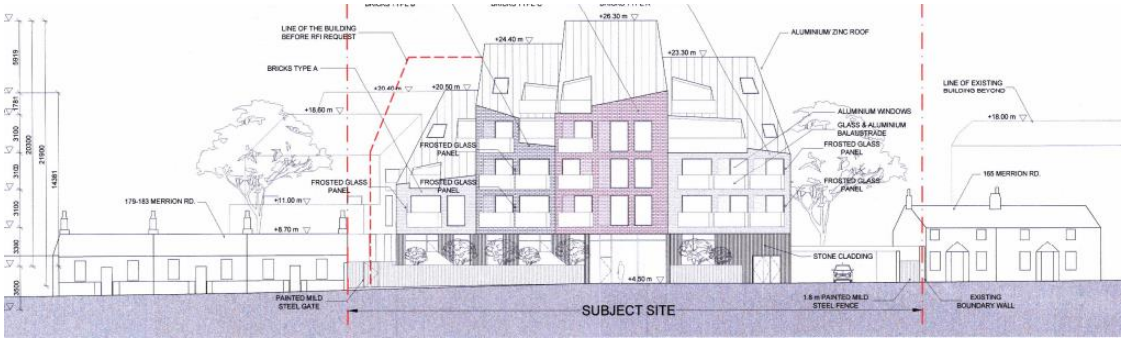


Figure 11 Permitted Block A

The proposed development is similar in scale, height and massing to the permitted developments on this site. The use as student accommodation, rather than apartments, has resulted in alterations which include the omission of balconies, the reduction in height of block A, and the removal of the podium and car parking. All of these, when taken in the round, are considered to improve the proposal and are minor in nature compared to the permitted scheme. As such the principle of buildings of this scale and overall massing is considered to be acceptable in principle in line with the history of the site.

RATIONALE

Proposal

The proposed development is to deliver 200 student bedrooms within 32 clusters in two blocks rising up to 6 storeys in height. Associated amenity space and facilities, communal open space, bicycle and car parking will also be available.

Rationale

The proposed development of student accommodation is located within c.250m of St Vincent's University Hospital (SVUH). Providing student accommodation would allow medical students studying in SVUH live within close proximity of the facility. It is considered an ideal location to support the vital work SVUH do in education, training and research. It is one of the world's leading academic teaching hospitals providing front line, acute, chronic and emergency care across over 50 different medical specialities. They are the only public hospital in Ireland with international accreditation and are recognised for their excellence in education and research.

Due to the nature of hospitals, they are open and operational 24 hours a day, often resulting in staff, including student staff, working unsocial hours. Therefore, the provision of student accommodation within 5 minutes' walk of the hospital, supporting their training and education is appropriate in terms of land use planning. There are no other purpose-built student accommodation (PBSA) facilities in the vicinity of the hospital. The nearest PBSA is over 1km away and serves UCD.

In terms of architecture and urban design, the site is at a strategic location on one of the main arteries into Dublin City Centre. The site also has established permission for significant residential development at a scale and form that reflects its location and accessibility.

It is noted that the existing surrounding area is not characterised by any one architectural style and there is a variety of building types and uses immediately surrounding the site. There is also a variety of setbacks from the road.

The proposed architectural style has been carefully considered to integrate and complement the surrounding area. There is an emphasis on creating a fine grain appearance. The infill scheme is a modern design (similar to the design previously permitted) and which also optimises the use of this highly accessible zoned site located in an area with high demand for '*purpose build student accommodation'* (PBSA).

The internal layout provides 32 clusters each of which have between 2 to 8 bedspaces and will provide high-quality modern student accommodation. All clusters have a communal kitchen/ living/ dining area. There is a proposed connecting basement under blocks A and B which provides residential amenity space and facilities to support the students.

It has been sensitively designed to take into account the protected structures to the east while balancing it against the modern developments that have been recently developed in the area as well as the older 4 storey apartment block to the west. This site will provide the balance and gentle transition between these two areas.

As noted above the proposal is similar to the permitted apartment blocks under DCC Reg Ref 4477/19 and 4051/21. In both blocks, due to the use as student accommodation, balconies are not now included. The undercroft parking and associated podium in the previous permission are also excluded. The omission of the podium and undercroft parking creates an additional planning gain and enables more comprehensive, natural and landscaping and planting within the development, enhancing the potential for biodiversity of the site.

The alterations will result in a very similar visual impact compared to the permitted development when viewed from the public road street as is demonstrated by the photomontages submitted with the application.

Site layout comparison

In terms of site layout, while the footprint has altered with projections into the proposed courtyard, for both blocks the distance to the adjoining neighbours to the south has increased, which is their closest neighbours.

In line with the Compact Guidelines, the 200 student bedrooms will provide the equivalent of c.50 residential apartments. This is comparable to the 46 apartments permitted on site. Therefore the resulting density is similar to that already permitted on the site.

Block A comparison.

Block A has a similar bulk and mass compared to the permitted developments; however, it is not as tall (as highlighted in the elevations), the distance to the adjacent protected structures has also increased and it is set back further from the Merrion Road. The overall form of the elevation is simplified when viewed from Merrion Road while the relationship between the proposed development and the protected structures is similar if not improved due to the increased distance between the blocks and the reduced height.

The relationship with Elm Court to the north is also changed due to the projection to the rear. However, this has been carefully considered in order to ensure that there is no undue overlooking,

over shadowing or loss of privacy. There are no directly overlooking windows between the two properties due to the layout of the site and the oblique views between the two.

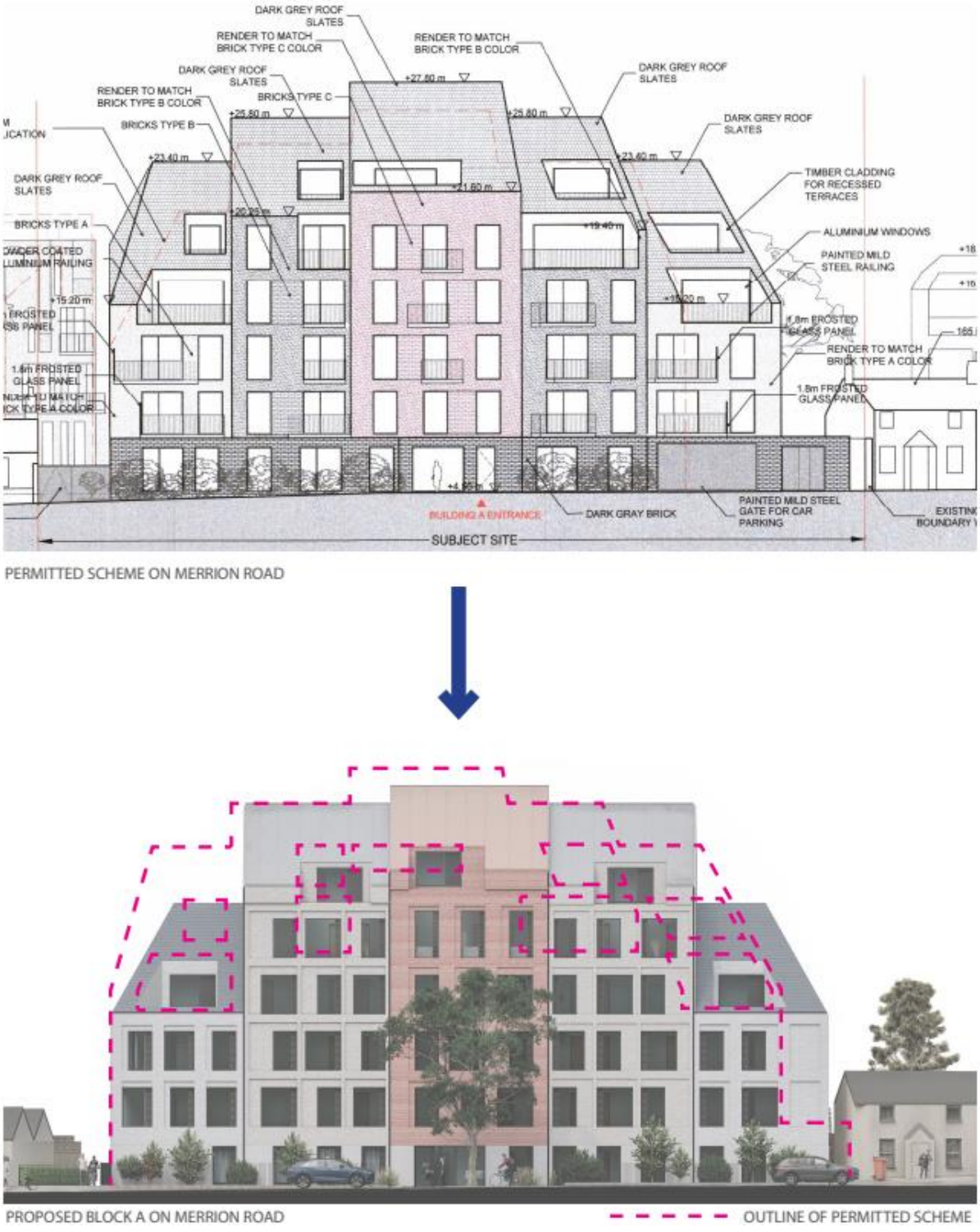


Figure 12 Block A permitted versus proposed elevations, permitted on top and proposed below

Figure 13 Verified views comparison between the permitted on the left and proposed to the right

Block B comparison.

Block B has been altered to provide a simpler design but with varied roofline and height, creating a finer grain to this block and resulting in move visual interest when viewed from the courtyard from the adjacent properties to the south.

While it is taller than the permitted Block B its footprint has been altered resulting in this block moving further away from the protected structures and neighbours to the south. The impact of this proposed structure would be similar or slightly lessened when compared to the permitted scheme.

Again, due to the nature of the layout of the site, and the orientation of the surrounding properties there will not be any direct overlooking of adjacent properties.

Figure 14 North/ East elevation facing the protected structures, proposed to the left and permitted to the right

Figure 15 Block B South East Elevation - proposed on top, permitted below

Reinstatement of a basement

DCC Ref. Ref. 4477/19 granted permission for a single storey basement under block A, the open space area and part of block B. The subsequent amendment DCC Reg Ref 4051/21 omitted this basement and replaced it with undercroft parking and the open space at podium level. Therefore, the principle of a basement on this site is acceptable.

The proposed basement is directly under block A and B, with a connecting area below. This proposed basement is significantly reduced and is removed from the boundaries of the site, ensuring it will not impact on the adjacent properties. This space will provide a variety of amenities to the PBSA including bike storage, a management area, storerooms and parcel rooms, co working area, a gym and communal space as well as a flexible space and a laundry area. These are all lit by an attractive lightwell which enable natural light to penetrate the basement.

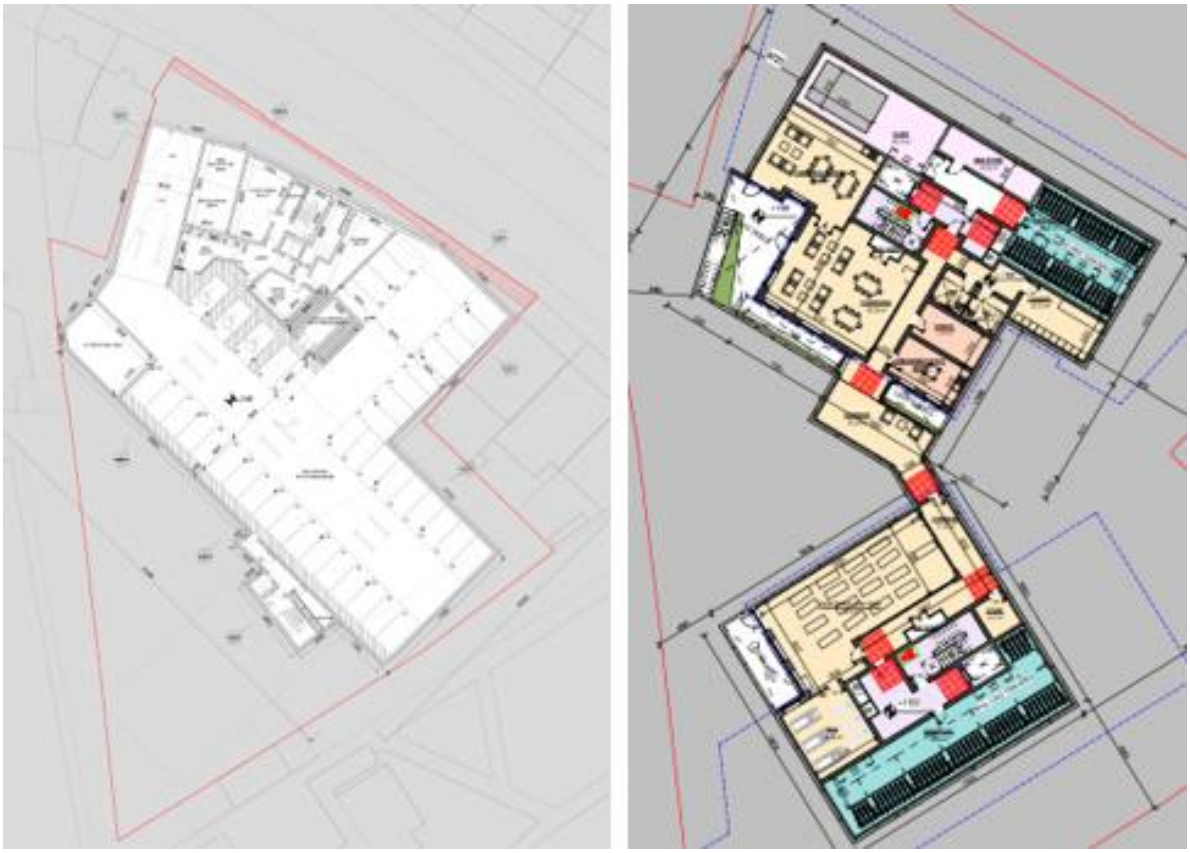


Figure 16 Comparison between previously permitted basement and proposed. The permitted basement is to the left and the proposed is to the right.

Car and cycle parking

Car parking

This student proposal includes for one accessible parking space and 1 set down space located between blocks A and B. This site, in line with the Development Plan standards and the Sustainable Residential and Compact Settlement Guidelines for Planning Authorities 2024, is an ideal site for reduced car parking. This is due to the nature of the development (student accommodation) and also:

- proximity to excellent public transport, both the bus and DART,
- location in a central accessible location as defined in the Sustainable Urban Housing Design Standards for New Apartment Guidelines for Planning Authorities 2023 and Sustainable Residential and Compact Settlement Guidelines for Planning Authorities 2024,
- Its use as a Purpose Built Student Accommodation,
- Its proximity to both St Vincent's University Hospital, University College Dublin and Trinity College which are all third level institution which this scheme could serve.
- access to cycling and pedestrian linkages into Dublin City Centre and the wider area.

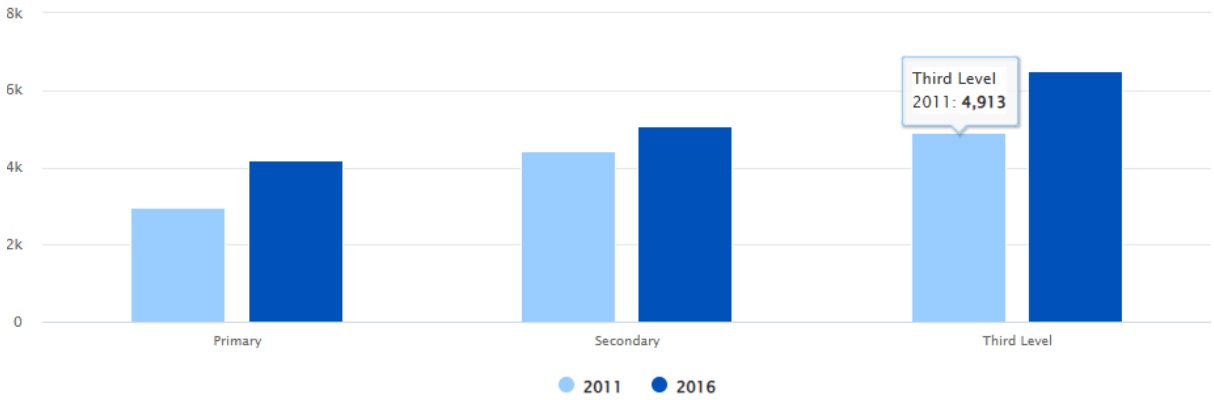
Cycle parking

The proposed cycle parking is proposed to deliver 248 spaces on site both in long and short term facilities. 5% is non standard bicycle parking, the equivalent to 12 parking spaces, distributed across the site which is fully in accordance with the DCC Development Plan.

As noted above this PBSA is primarily built to serve St Vincent's University Hospital which is within 7 minutes walk of the site. Future residents of this development will have the choice of walking or cycling given the site's proximity to SVUH and UCD. However, this level of proposed cycle parking will provide options for students whether they chose to walk, cycle or use public transport.

Census analysis for Commuting In Ireland, dating from 2016 (this information has not been compiled for 2022 Census) demonstrates that the number of student cyclists is steadily increasing during each census period. Student Travel Patterns Census of Population 2016 – Profile 6 Commuting in Ireland - Central Statistics Office

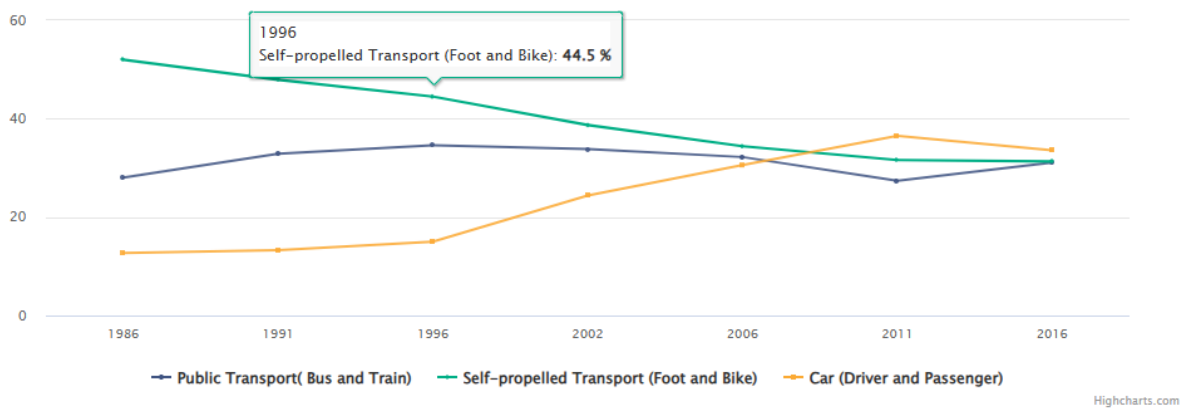
Figure 5.4 Dublin Student cyclists, 2011 - 2016



This analysis also demonstrates how student travel patterns to college have changed over a 30 year period since 1986. It is noted that students using car options has also increased in the same period but this could be a reflection in the increase in students attending college who are now travelling greater distances daily from their family homes due to the price of student accommodation within the cities. Furthermore, the analysis found that those commuting by car, whether as a passenger or driver, fell by c. 2.9% in the 5 year period between 2011 to 2016. The proposed development will further enable this modal shift by:

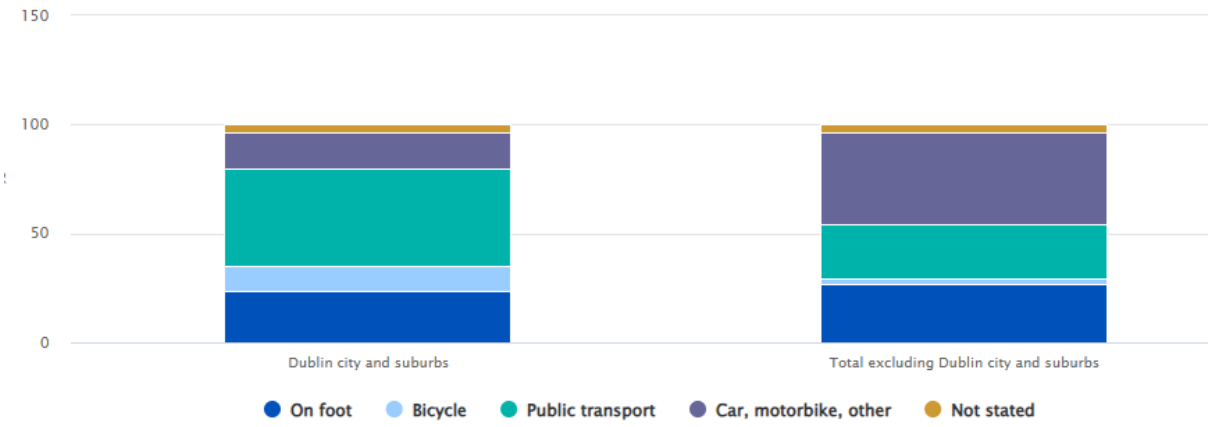
- providing affordable and accessible accommodation close to a large educational facility served.
- Providing a Mobility Management Plan to all residents making them aware of the cycle facilities on site, the public transport availability and also the walking routes within the area.
- Forcing a modal shift by not accommodating car parking on site.

Figure 5.8 Modes of travel for college students 1986-2016



The study also demonstrates that reliance on public transport by students has remained relatively static over this period. Given this sites proximity to public transport, including bus and rail, it can be expected that this will be a preferred option for this site. Despite the drop in self propelled transport the analysis found that walking *"was the most common method of travel to college, representing 1 in 4 (48,812 - 26%) third level commuters. This was followed closely by third level bus commuters, who at 24 per cent (45,943), represented an increase of 5,473 (13.5%) commuters on the 2011 figure of 40,470."*

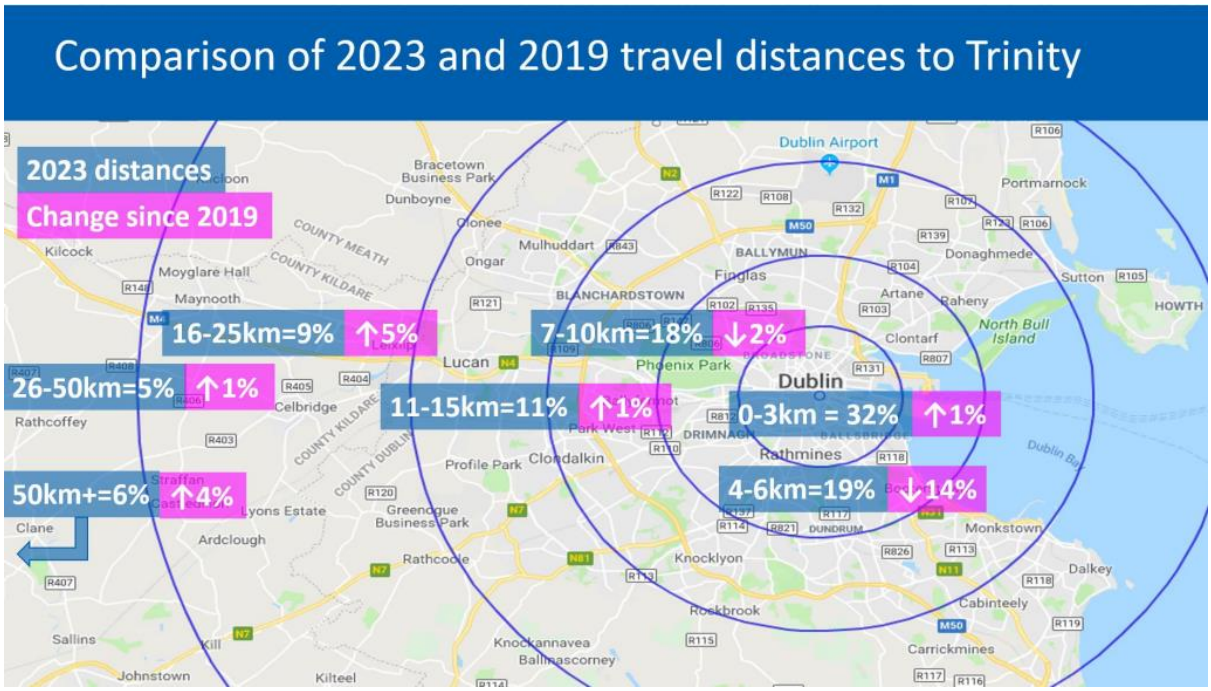
Figure 5.9 Means of travel for third level students, Dublin city and suburbs and elsewhere, 2016



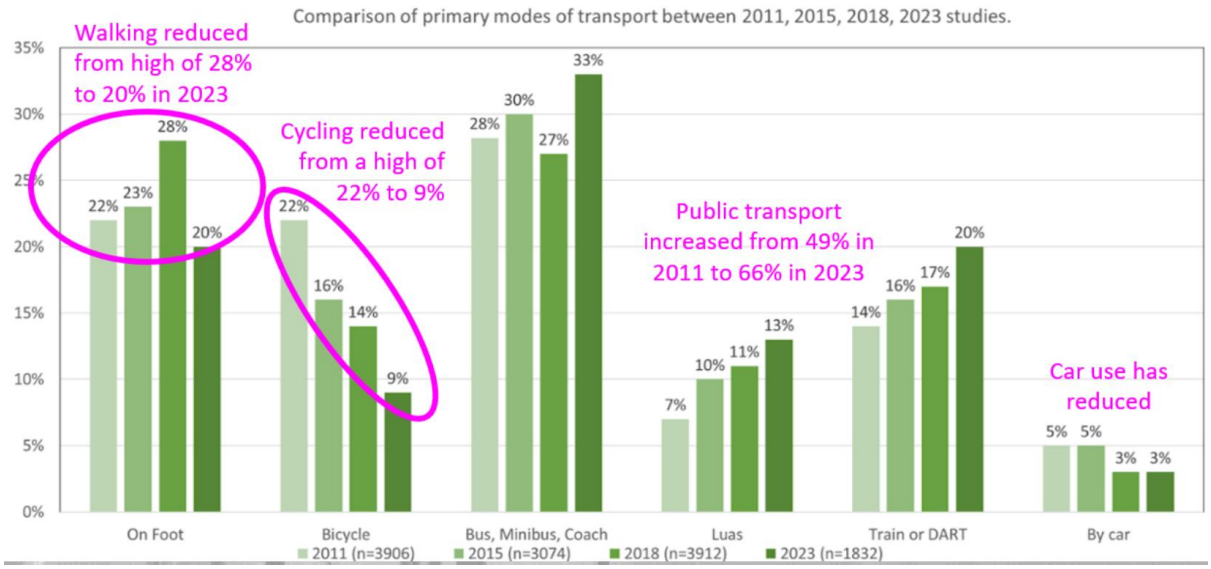
It is noted that within Dublin city and suburbs, the vast majority of students commute by public transport, followed by walking. 11.1% commute by bike and 16.5% commute by car, motorbike or other. This is level of transport by private vehicle is significantly less than the 42.4% for students who are commuting from outside of Dublin city and suburbs. Therefore, this approach of reduced car parking is a reflection of the existing situation, in which the use of private vehicles to commute to third level is in the minority.

Trinity College Dublin have also been monitoring their students and staff mode of travel since 2011 as part of the Healthy Trinity Smarter Travel group (Living Lab - Healthy Trinity - Trinity College Dublin (tcd.ie)). This group has found that generally travel distances to college have increased, with people living within 4 to 10km of Trinity dropping by c. 16% in the 4 years since 2019. Again this could be a

result of shortage of student accommodation, along with increasing prices for accommodation in these areas resulting in longer commutes for students.



This report also found that there was a drop in the number of people walking and cycling into college, as well as a decrease in the number of car trips. However, the reliance on public transport has increased. This increase in the need to travel by public transport could be attributed to the increased commuting distances removing the opportunity to walk or cycle. Again, this proposed student accommodation will address this need for the future student residents of these blocks given their proximity to a range of educational facilities within 30-40 minutes walk or twenty minutes cycle of the site.



Public Transport Capacity Analysis

A Public Transport Capacity Analysis has been undertaken by Transport Insights (see appendix B of the Traffic and Transport Assessment). This report found that residents of the proposed development would utilise ca. 0.08% and 0.06% of the total capacity of existing AM and PM peak hour public transport services respectively. Furthermore, it has been identified that local public transport services (bus and DART) have ample capacity to accommodate such demand. As a result, it is apparent that current public transport capacity is sufficient to accommodate additional demand generated by the proposed development.

Provision of communal space

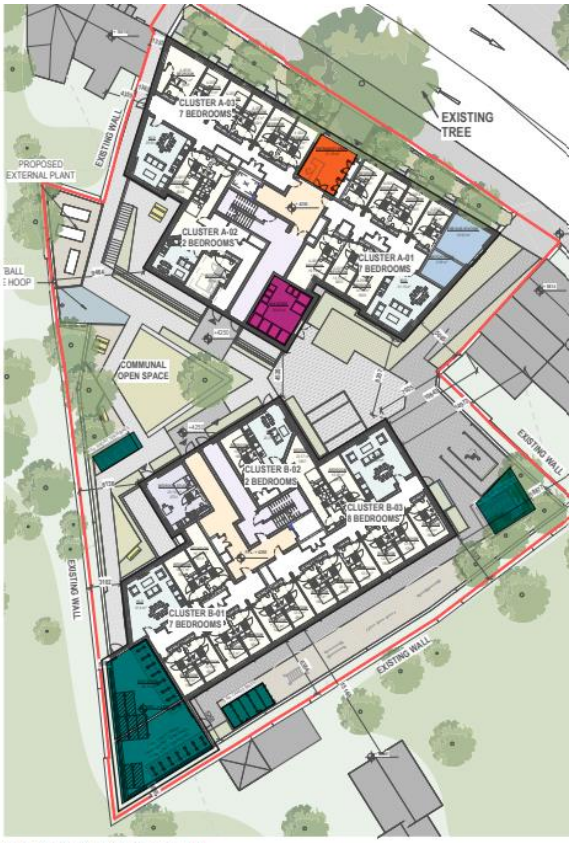
The proposed external communal open space provides c.820sqm predominantly at ground floor level between block A and B and to the rear of block B. This is landscaped to provide attractive spaces to relax, this space also provides a basketball practice hoop and outdoor gym equipment. All of this area has good light penetration with c. 66% of this space achieving over 2 hours of sunlight.

In addition to external space, as set out above, there is also internal communal space equal to 412.88 at the basement and ground floor level providing a range of services for occupants of the development including reception area, lobby, parcel and laundry room, student residents' lounge, co-working space, multi-purpose gym/studio.

The total communal internal and external space equates to 1,232.88sqm which is in excess of the 1,000sqm or 5sqm per bedspace required by the Development Plan.

It is worth noting that this does not include the attractive living, kitchen, dining spaces within each of the 32 clusters which provide a social space within each of the units throughout the development.

BASEMENT FLOOR PLAN



GROUND FLOOR PLAN

SHARED AMENITY

STORAGE

BINS

BIKE STORE

Conservation Impact

Molloy Associates have carried out an Architectural Heritage Assessment which confirms that any development on this site will alter the setting of the protected structures. However, it sets out detailed mitigation measures for the protection of the existing walls and confirms that the proposed development "*presents an improvement to the permitted scheme, with greater efforts at distancing from protected boundaries.*"

The summation concludes that "*The proposed development, addressing a busy road, seeks to construct an infill building of scale between two lower scaled, established, building groups of heritage interest. Its modulated form introduces flexibility at boundaries shared with both groups, enabling it to better integrate with what is an inconsistent, but acceptably diverse streetscape, reflecting both the rhythm of extant fenestration and pitched roof typologies dominant in the vicinity. The resulting scheme in its dynamic interpretation of common local characteristics, blends successfully with its environs and introduces an enrichment that does not dominate either the setting or character of buildings of heritage interest adjacent*."

Student Accommodation Concentration Assessment

Section 15.13.1 of the CDP provides guidance on the development of Purpose-Built Student Accommodation (PBSA) in assessing proposals to '*resist the overconcentration of such schemes in any one area, in the interests of achieving a sustainable mix of* developments' pending the outcome of a Student Accommodation Concentration Study. The Development Plan notes that in an area where it is considered that there is an overconcentration of PBSA developments, a report detailing all existing and proposed PBSA developments within a 1 km catchment area of the site and justification that the development will not undermine the balanced pattern of development of an area will be required to be submitted.

The Development Management chapter of the CDP outlines the elements of the methodology to be used in the preparation of student concentration and demand reports stating:

> *"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 accommodation developments within an area, including a map showing all such facilities within 1 km of a proposal."*

In alignment with the CDP policy, and Objective QHSN45 on student accommodation, this section is primarily concerned with evaluating:

- the existing character of the area in which the development is proposed including local amenities and facilities;
- the existing and proposed mix of uses in the vicinity of any proposed development;
- the impact of additional student accommodation on the wider objective to provide a rich and vibrant range of uses in the city centre including residential, social, cultural and economic functions;
- the need to prevent an unacceptable intensification of activity, particularly in predominantly residential areas;

The study uses the latest available supply and demand data and modelling to critically assess the need for student accommodation at the proposed location, while generating a methodology to measure overconcentration.

Existing character of the area and proposed uses

As set out above, Merrion Road has a mixed character with residential homes immediately to the north and east while to the south are more mixed uses including offices and medical facilities. Within a short walking distance of the site is the St Vincent's University Hospital which is a teaching hospital. Further to the north is Merrion Village, while to the south is Rock Road and Blackrock will of its associated amenities.

This is an area which has undergone significant redevelopment in recent years changing from a predominantly low rise area to a more high rise with a greater mix of uses including more office development particularly to the south. This change in character is a reflection of the accessible nature of the location with its excellent public transport via bus and dart as well as its ease of access to the city centre and to the south via cycling and walking.

The impact of additional student accommodation and intensification

Approach:

In alignment with the CDP policy, and Objective QHSN45 on student accommodation, which requires *"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 accommodation developments within an area, including* a *map showing all such facilities within 1 km of* a *proposal."*

While there is no specific guidance provided in the Development Plan as to how potential overconcentration is assessed. Edinburgh City Council's Student Housing Guidance is considered to be best practice in terms of providing the appropriate concentration levels of student accommodation in terms of maintaining the social and physical fabric of a given area. This guidance document indicates that:

> *"…where there is good access to university and college facilities by public transport, walking and cycling, student housing will be generally acceptable provided it will not result in a student population* ***over 30% in the locality****."*[1]

As there is no equivalent document for Dublin, this has been widely referenced and accepted as an appropriate threshold in the assessment of many proposed student accommodation schemes including a student accommodation SHD scheme at Sweeney's Terrace, Mill Street and Clarence Mangan Road, Dublin 8 in 2019. It is therefore proposed to assess the potential for overconcentration on the following basis:

- Existing demographic profile of population 2022 within the catchment area using Small Area Census data;
- Existing and proposed permitted/under construction PBSA accommodation schemes within the catchment area;
- Existing and permitted/under construction standard accommodation schemes within the catchment area;
- Existing and future (including proposed development) student population within the catchment.

In order to provide a comprehensive and robust assessment, an examination of student accommodation developments within a 1 km radius, in accordance with the policy set out above is carried out.

Assessment:

The proposed development will address an ongoing shortage of student accommodation, in accordance with national housing and planning policy including the National Student Accommodation Strategy. The National Student Accommodation Strategy estimates a demand for 42,375 no. bedspaces in Dublin by 2024. The current supply of public and private student bedspaces in Dublin is estimated as 19,004, within 52 No. developments (April 2024). There was a total of 11 No. granted schemes in the planning and development pipelines accounting for an estimated net total of 5,507 No. student bedspaces (April 2024). The majority of these consents are occurring within the existing campus areas of UCD and DCU, or in close proximity to the TU Dublin Grangegorman Campus.

Therefore, even with the existing and permitted/ pipeline bedspaces there is remains a shortage of c. 17,864 bedspaces. This shortfall is unlikely to be resolved in the foreseeable future.

The proposed development is located in close proximity to St Vincent's University Hospital, which is one of the foremost teaching hospitals in Dublin. It is also in close proximity, c. 15-minute cycle of Trinity College Dublin, National College of Art and Design, Royal College of Surgeons, Griffith College, Dublin Business School, and University College Dublin, while TUD Grangegorman and NCI Ireland are slightly further away but accessible via public transport. The universities have a total combined enrolment of c. 82,671 No. third-level students in 2023.

As demonstrated in the maps and tables below, Merrion Road has no purpose built student accommodation within the vicinity. There is a total of 210 No. student accommodation bedspaces currently in operation within 1km of the application site (Aparto – Montrose). 125 no. student bedspaces are currently permitted at Woodbrine Road, Booterstown within the 1 km radius.

The CSO defined '*Electoral Divisions*' were used to develop the demographic profile of the relevant catchment by overlaying the 1 km radius buffer zone over the subject site. The catchment contains 5 No. electoral divisions with a total population of 19,100 persons in 2022. This population has increased by 2.67% from 18,604 persons in 2016 and by 9.71% from 17,410 persons in 2011.

In 2022, there were 2,090 persons aged 15+ years old and classified as a 'Student' in the catchment, accounting for 10.94% of the total local catchment areas population. Notably, the population aged 15+ years old and classified as a 'Student' was larger in 2011 (2,271 persons), and a higher proportion of total population than it is currently (at 12.48%).

Considering the existing and proposed PBSA developments within the 1 km catchment, alongside the granted large scale residential developments within the 1 km catchment, and the proposed PBSA development (200 no. bed spaces), the total student population would represent an increase of c. 535 to c. 13.7% of the total population when fully occupied (an increase from 10.94% of in 2022). This calculation was derived using the 'PBSA c*oncentration calculation table*' (Table 1), as informed by international best practice in Edinburgh, ref. Edinburgh City Council (2015) 'Edinburgh Planning Guidance: Student Housing', to quantify student concentration/ overconcentration, and ensure sustainable PBSA provision around the city. It is submitted in this report that these figures fall well below a threshold of 30% of the total population to describe overconcentration. On this basis, there is unlikely to be any significant relative increase in the number of students living in the area.

Description	Ref.	Value	Method
2022 total Census population for the 1km catchment	a	19,100	Census 2022
2022 student Census population for the 1km catchment (Aged 15+ classified Student)	b	2,090	Census 2022
2022 Student Census population as a percentage of total population (%)	**c**	**10.94%**	**b / a * 100 = c**
Number of additional student bed spaces completed/occupied since 2022	d	210	Author
Proposed number of student bed spaces in pipeline 2024 (undeveloped)	e	125	Author
Number of units in Merrion PBSA proposal	f	200	Author
Total projected new student population	**g**	**535**	**d + e + f = g**
Future Population (Census 2022 + All Completed/Consented)	h	19,635	a + g = h
Future student Census population for the 1km catchment (Aged 15+ classified Student)	i	2,625	b + g = i
Total proposed student population as a percentage of the overall total population (%)	**j**	**13.74%**	

Table 1: Concentration calculation table for 1 km catchment area adapted from Edinburgh Model (Source: MCG Planning).

Census Year	Local Catchment Area Population	Classified 'Students'	% increase/decrease of student pop
2022	19,100	2,090	-7.97% since 2016
2016	18,604	2,271	-3.78% since 2011
2011	17,410	2,172	-

Supply:

As is widely acknowledged Dublin City faces a shortage of supply on every accommodation front, including houses/apartments, rental accommodation, student accommodation, business community accommodation, hotel and guest accommodation, social housing accommodation. There is a requirement for a range of accommodation.

As part of this Student Accommodation Concentration Assessment, an audit of existing and proposed facilities was carried out in the local area to assess the provision and need for additional PBSA accommodation infrastructure. A desktop study was used to collect the baseline information. A radius of 1 km from the subject site was used as the focus for this assessment to align with the development standards for student concentration assessments outlined in Section 15.13.1 of the Dublin City Development Plan 2022-2028. The assessment also uses the complete database of PBSA developed by the HEA in Q3 2019 as a baseline audit of assets in Dublin. In addition, a review of all granted and commenced permissions was carried out to determine the level of PBSA development and completions in the period between 2017 and 2024.

As of April 2024, Dublin offers a total of 19,004 bedspaces in PBSA accommodation, in 52 PBSA accommodations. Most of these bedspaces are concentrated in Dublin City. The Dublin 4 and Dublin 8 postcodes account for 45.8% of the bedspaces, with the remaining c 10,000 bedspaces located throughout Dublin 1, 9 7, 2, and 6 (Table below).

Postcode	Bedspaces (Ordered High to Low)	Percentage of Total
Dublin 4	4,442	23.8%
Dublin 8	4,102	22.0%
Dublin 1	2,691	14.4%
Dublin 9	2,587	13.9%
Dublin 7	2,518	13.5%
Dublin 2	1,300	7.0%
Dublin 6	1,000	5.4%
Total	**19,004**	**100.0%**

Table 2: Postcode location of PBSA bedspaces within Dublin (Source: MCG Planning 2024).

The spatial distribution of existing and pipeline PBSA accommodation across the 1 km catchment area is shown below and the figures from this have been included in the future student population calculation. This demonstrates that there are no facilities within 1km of St Vincent's University Hospital. Most of the PBSA are either clustered within UCD Campus grounds or in the city centre.

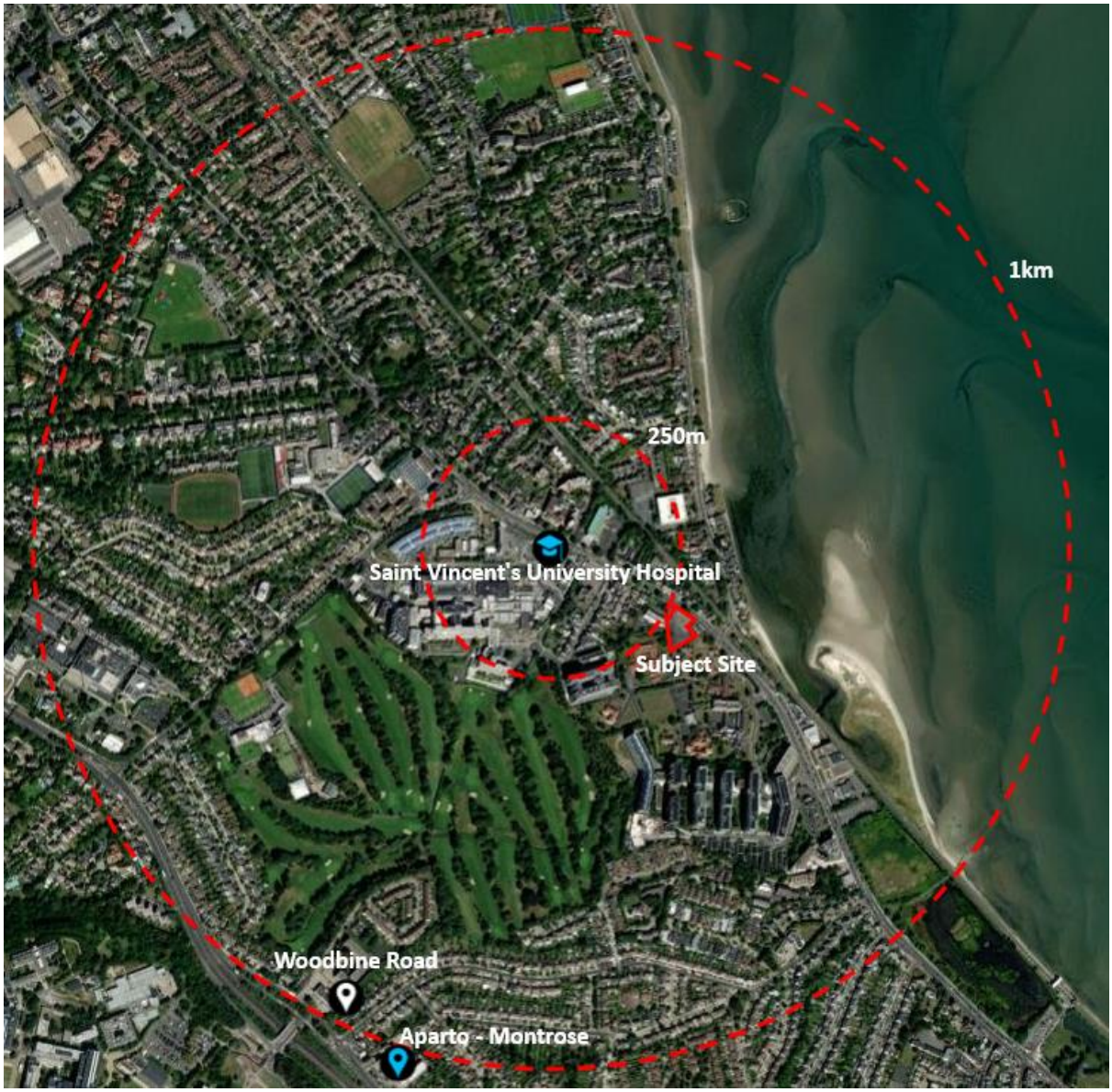


Figure 17 Student accommodation within 1km of St Vincent's University Hospital

Existing Student Accommodation	No. of Beds
Aparto - Montrose	210
Student Accommodation in the Pipeline	No. of Beds
Woodbine Road, Booterstown	125 beds
Total	335 beds

Figure 18: Local Catchment Area (Electoral Divisions)

Conclusion:

It is stated in the current Dublin City Development Plan that the Council supports the provision of high-quality, professionally managed, purpose-built third-level student accommodation, either on campus or in accessible locations adjacent to quality public transport corridors and cycle routes, in a manner which respects the residential amenities of the locality. The subject proposal satisfies the above requirements of the Council in their encouragement of purpose-built student accommodation in Dublin.

The assessment also demonstrates clearly that there no PBSA within 500m of SVUH and only one existing just outside the 1km range and one pipeline within a 1km area. Therefore, given the nature of the students who will be using this facility, and the anticipated antisocial hours they may be asked to work/ study, this is considered an ideal location for purpose built student accommodation.

Furthermore, as demonstrated by the Census data, and taking into account existing, permitted and proposed purpose built accommodation, even with the proposed additional 200 bedspaces the ratio of students within the area will be c. 13%, significantly below the 30% guidance.

It is therefore respectfully submitted that the proposed student accommodation development will not result in an overconcentration of student accommodation developments in the immediate area. It is also submitted that it will not impact on the overall character of the area, rather it will support St Vincent's University Hospital by providing attractive accommodation within walking distance of the hospital.

PRE-APPLICATION CONSULTATION

A pre-application discussion was held with Dublin City Council and the Design Team on the 9th February 2024 and on the 28th March 2024 regarding the application for student accommodation. The items discussed were as follows:

Item raised	Applicants' response
Student accommodation is acceptable in principle. It is considered an ideal location. Need to confirm the accommodation will be for students. A Student Accommodation Management Plan is required.	This is welcomed. A report by GAA is submitted with this application confirming how the accommodation will be managed. This report confirms that the application will be for students who are studying in St Vincents University Hospital or within the immediate vicinity.
The redesign is welcomed and considered more appropriate and more in line with the permitted development. Details of the roofscape should be provided. All rooms should be compliant with standards. Floor plans and layouts are required with details of furniture proposed in living spaces and bedrooms. Bedspaces must be included in the planning application as this will have a knock-on effect in terms of open spaces / guidelines requirements for K/L/D spaces. Appropriate lighting scheme is required along access routes and for bike parking. The difference in heights between the permitted and proposed needs to be clearly identified on the application.	The proposal is very similar to the permitted scheme with a similar roofline. Block A is slightly lower in height and block B is slightly higher. The footprint of both buildings also differs from the permitted but the overall scale, massing and heights are considered to be broadly similar. The details of the roofscape are indicated on the submitted architects drawings. The Architects Design Statement sets out details of the Housing Quality Assessment and Schedule of Accommodation. There are also floor plans and typical plans for each of the 32 clusters proposed. All standards are met. Fallon Design have provided a lighting plan for all of the communal areas. The drawing indicate clearly the difference in heights between the permitted and the proposed.
Residential amenity. Need daylight and sunlight study. Obscure glazing needs to be considered and how screening to mitigate loss of privacy. Impact on the protected structure.	A Daylight Sunlight Report by ARUP has been completed. This demonstrates that the proposed development has good levels of daylight internally. It also demonstrates that the proposal has a similar, or slightly lessened, impact on the existing adjoining properties. Due to the orientation of the buildings and the relationship with the adjacent properties no obscure glazing is required as there is no direct overlooking between properties.

	Molloy and Associates Conservation Architects have confirmed that the impact on the protected structures is similar to that of the permitted development and is acceptable.
Transport No car parking is acceptable but there should be 1 accessible space. All service/ drop off etc needs to be accommodated within the site. This should be demonstrated with swept path analysis. Cycle parking is acceptable and in line with appendix 5, table 1. Details on types of bike stands proposed is required. Residential travel plan will be required.	One accessible space has now been provided. Servicing arrangements for refuse is indicated along with swept path analysis in line with the TENT Engineering pack. 248 cycle parking spaces are provided within the scheme. This is in line with the Dublin City Development Plan. A Mobility Management Plan/ Residential Travel Plan is provided within the TTA.
Drainage SuDS is welcomed and surface water requirements are more stringent in the Development Plan. Green and blue roof is required. Basement Impact Assessment. SSFRA.	Drainage has been designed in line with the Development Plan. A Basement Impact Assessment is submitted with this application. A SSFRA is submitted with the application. This demonstrates the site is appropriate for student accommodation.
Conservation Conservation Report and Management plan for historic boundary walls and the protected structures should be submitted demonstrating retention /protection during construction phase and any mitigation measures. Courtyard - Planting should not be up against the base of the building.	Molloy and Associates have completed an Architectural Heritage Impact Assessment which includes the wall and protected structures. It is noted that the walls will be retained and fenced off to ensure their protection. There is no planting proposed against the base of the proposed buildings.
Parks Updated tree survey prior and tree canopy. No POS requirement. Landscape Masterplan will be required. AA Screening and a Biodiversity enhancement plan needs to be submitted.	An updated Tree Survey has been completed and is submitted with this application. Noted re POS. A landscape masterplan by NMP is submitted with this application. An AA Screening has been submitted this application. A Biodiversity Enhancement Plan is submitted with this application.

Statement of Response to S32B Pre-Planning Meeting and DCC LRD Opinion

An LRD Meeting, planning authority reference LRD6054/24-S2, was held on the 25th of June 2024 via Microsoft teams. Following this LRD Meeting under section 32 of the Act, the council were required to provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD under Section 32D of the Act.

Following consideration of the issues raised during the LRD meeting the Planning Authority issued its Opinion on the 22nd July 2024. This confirmed that *"constitutes a reasonable basis for an application for Large scale Residential Development subject to the applicant addressing the issues outlined below in any further application."*

The Opinion went on to state that *"in the event that the applicant proceeds to submit a planning application, the applicant is advised that the LRD application should be accompanied in the first instance by"*:

Items	Applicant's Response
Statement of response to the issues set out in the LRD opinion.	This section of the planning report provides a response to all of the items raised below. In addition to this each respective consultant also provides a response to the Opinion items.
Statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area.	Section 8 of this planning report (below) addresses in detail the Development Plan policies and objectives and confirms that the application is consistent with the Development Plan.

The Opinion also stated that: *"Furthermore, in accordance with Section 32D (a) and (b) of the LRD Act, the applicant is hereby notified that the documents submitted constitute a reasonable basis on which to make an application subject to the issues raised below being addressed in any documents submitted in a future planning application."*

Items	Applicant's Response
Planning	
The Applicant is invited to submit revised drawings which show the design of Block A altered so that the rear appears less bulky with improvements also made to the roof form.	Please refer to the 'DCC Notice of LRD Opinion – Architectural Items – no.1' in section 0.0 of the Architectural Design Statement Prepared by MDO Architects. The massing for Block A has been altered for a less bulky rear and simplified roof-scape. Previously designed dormer windows have been replaced with windows integrated into the roof structure to reduce the massing of the block. The gable ends have been tapered further, enhancing the massing of the building. The material used for the roof on either end of the block will be slate, to tie in with the adjacent

	buildings. The material used for the roofs in the centre of the block will be metal. The massing at the back of the block has been reduced, giving it a more compact profile. Brick colours have carefully been chosen to visually improve the streetscape, the existing facades of surrounding buildings have been taken into consideration when making this decision. Overall, the block has become more streamlined and fits well in its surrounding context.
The Applicant is also invited to provide for an increase of internal communal space.	The proposal has been increased from 271.31sqm to a provision of 412.88sqm of internal communal space. This is through providing a basement also below block B enabling a connection between the two blocks and a better distribution of the amenity space between the two buildings. The amenity space reception area, lobby, parcel and laundry room, student residents' lounge, co-working space, multi-purpose gym/studio located across the basement and ground floor levels. 1,232.88 of communal space is provided overall which includes 820 external space. This is in line with DCC's requirement to provide in excess of 5sqm per resident or 1,000sqm.
Traffic and Transportation	
This division has serious concerns regarding the proposed layout and the operational capacity of the site to accommodate service/delivery vehicles/drop off/pick up etc. as no designated set down spaces are provided. It appears that a proposed set down area is also used as a turning area for vehicles creating a conflict when a vehicle is parked in this area and the ability of vehicles to manoeuvre safely within the site. This may also lead to overspill on to the public road and obstruction of the bus/cycle lane and future CBC as well as reversing of vehicles onto the public road. It appears there is space for 2 no. standard cars to park in the set down area with space to turn, however the capacity to accommodate multiple maintenance/delivery vehicles is unclear. As presented, it is unclear that the proposed layout can be effectively and safely managed. The anticipated number of vehicle	Please refer to the 'LRD Transport Opinion Response' prepared by TENT engineering. A setdown area is relocated and is clearly designated on the layout drawings. It is clear of all turning vehicles. This will only be used for short term usage. The TTA confirms that the proposed arrangement will prevent overspill or obstruction of the public road. There will also be no reversing onto the public road. All car parking will be managed by the site building staff. Section 7.3 of the TTA identifies the various vehicles accessing the site and their frequency.

movements/demand to set down should be clarified, as well as the type of vehicle, and based on this it should be demonstrated that the proposed arrangement can accommodate this demand; supporting swept path analysis should be provided. A dedicated set down space/area that does not conflict with the turning space is required.	Revised swept path analysis have been submitted with the application under drawing titled Parking and Drop Off Tracking.
The submitted swept path analysis appears tight. Fire tender and refuse vehicles are tracked directly adjacent to walls and other structures; it is not clear the access is workable. The swept paths are also shown in close proximity to cycle parking and doorways, which gives potential for conflict with cyclists, pedestrians and parked bikes. Adequate buffer zones should be provided. Having regard to the requested changes to layout to accommodate servicing / set down area, revised fire tender and refuse access should be demonstrated through revised swept path analysis; together with the layout of turning areas.	Please refer to the 'LRD Transport Opinion Response' prepared by TENT engineering. Swept Path analysis has been included for Refuse Truck Tracking and Fire Tender Tracking. The road is designed in compliance with DMURS with priority for cyclist and pedestrian on the shared surface.
A Stage 1 & 2 Quality and Road Safety Audit shall be prepared and submitted with the forthcoming application. This shall include, but not be limited to: the proposed internal road layout and turning facilities and the car parking layout. Any recommended measures or alternative measures agreed with the auditor should be implemented and design updated accordingly.	Please refer to Appendix D of the Traffic and Transport Assessment. This assesses the proposed shared surface road, proposed car parking layout and cycle parking facilities. All proposed measures suggested by the auditor shall be incorporated in the design.
Cycle Parking: *Insufficient cycle parking provisions has been proposed. The proposal of 200 bedrooms results in a minimum requirements of 200 long stay and 40 short stay/visitor cycle spaces. A total of 160 cycle parking spaces are proposed, 132 no. long stay spaces and 28 short term spaces; this is below minimum Development Plan standards, the quantum of cycle parking should meet minimum standards for both short stay and long stay; revised cycle parking proposals and layout plans should be submitted.*	Increased cycle parking has been provided to include 248 no. cycle parking spaces. This includes 206 no. long term parking spaces and 42 no. short term parking spaces. This is in excess of the 200 long term and 40 short term cycles required by the Development Plan. These are located at basement and ground floor level. The basement cycle storage spaces can be accessed via a lift or stairs with tyre runs beside them.
Long stay cycle parking is proposed as two tier stands, a 1.8m aisle width shown which is less than that set out in Section 6.5.5 of the NTA Cycle Design Manual i.e. "2.5m aisle width for two-tier racks arranged perpendicular to the aisle". As per the NTA Cycle Design Manual (p.178) "some users will find it difficult to lift their bike from the floor onto the tray of the upper tier". In some	Please see the drawings by MDO named Block B – Bike Store, and Basement Bike Stores. These provide sections and elevations of the bicycle stores. These clearly demonstrate compliance with the proposed NTA Cycle Design Manual and provide

instances, two tier racks are of low quality whereby the lifting mechanism is difficult to use, and they do not facilitate bicycle frames being locked as well as wheels. The lower tiers are not always suitable for larger bicycles or bicycles with baskets etc., due to the spacing. For these reasons, a proportion of long stay parking should be provided as Sheffield stands or similar.	a variety of bike storage types including tiered bicycle storage and Sheffield stands.
As per the NTA Cycle Design Manual (2023), Section 6.3, 5% of cycle parking should be provided for larger non-standard cycles.	12 non standard bicycle parking are provided which are distributed across the site. This is the equivalent of 5% of total number of parking spaces.
The quality of proposed cycle parking and ease of access and use should be demonstrated, the specification of cycle stands should be provided. The NTA Cycle Design Manual, Section 6 Cycle Parking, should be considered.	Please see the drawings by MDO titled "Block B – Bike Store, and Basement Bike Stores". These provide sections and elevations of the bicycle stores proposed. These clearly demonstrate compliance with the proposed NTA Cycle Design Manual Section 6.
Cargo bike and E-bike charging facilities should be provided.	Cargo bikes are accommodated within the 5% non standard bicycle parking spaces. EV Charging points are indicated on TENT Drawing titled "Bicycle Parking Provision and Layout to the rear of block B in a secure location."
Given that the long stay cycle parking compounds are at the rear of the development, lighting along the access route should be considered.	Fallon Design M & E Engineering have provided a Public Lighting Layout drawing indicating appropriate lighting along the access route to all cycle parking facilities. This has been reflected in the landscape drawing.
The requested Stage 1& 2 Quality and Road Safety Audit as previously mentioned, shall include a review of the cycle parking facilities and access routes.	Appendix D of the Traffic and Transport Assessment includes a Stage 1 and 2 Quality and Road Safety Audit. This Audit was completed by Bruton Consulting Engineers. This report confirms that any items raised are addressed. It also confirms that the proposed development is compliant with DMURS.
Car Parking: 1 no. accessible car parking space is proposed. It is not clear if this space includes EV charging facilities; EV charging should be provided.	An accessible car parking space is proposed. This includes EV Charging facilities. This is indicated on the Site Layout drawing by TENT Engineering.
An Outline Construction Management Plan (OCMP) has been submitted. The CTMP indicates that the construction access will be via the Merrion Road. It is not clear if use of the existing vehicular access is proposed; the proposed construction access location/s and layout should be clarified.	The Outline Construction Management Plan now indicates in Figure 2.2 of same the proposed construction entrance off the Merrion Road. It uses the existing vehicular entrance onto Merrion Road.
The applicant has submitted: a Traffic and Transport Assessment including an outline MMP	Noted and the reports have been updated as necessary.

and Public Transport Capacity Assessment; an Operational Management Plan; Operational Waste Management Plan; and an Outline Construction Management Plan. The scope of these reports are generally acceptable, but should be updated as necessary to address the points outlined above. *In addition to the above reports this division requires the following reports to be submitted at application stage: -* *o Stage 2 Quality and Road Safety Audit*	Stage 1 and 2 Quality and Road Safety Audits are included in Appendix D of the Traffic and Transport Assessment.
Drainage – Surface Water Management	
Civil Planning Report and Drawings: provide detailed information to support the figures presented in the Report, including a breakdown of the individual elements along with contributing areas, sizes, attenuation volumes, rainfall return periods, etc.	Please refer to the 'LRD Engineering Opinion Response' prepared by TENT engineering. This confirms that all the detailed figures are included in the Civil Planning Report and also on the drawings.
Provide construction details of proposed Green-Blue roof and flow control outlets. Expand on reasoning for green-blue roof coverage (approx. 22% roof area coverage proposed), e.g. pv panels, design considerations. Justification must be given for reduced area coverage as required under the Development Plan, Appendix 11 Green-Blue Roof Guide.	The quantum of Green Blue roof has been maximised throughout the site. Both blocks A and B have primarily pitched roofs to provide visually interesting roof scape and a high quality architectural design in line with the requirements of the Planning Department. Therefore, the green blue roof provision has been constrained but provided at every possible opportunity. The quantum, design and justification for same is provided within the Civil Planning Report by Tent Engineering and is considered in accordance with the Development Plan.
Report must demonstrate adherence to DCC policies and sustainable drainage requirements as per Development Plan 2022-2028, in particular Appendices 12 (SuDS Design Guide) and 13 (Surface Water Management Guide).	The Surface Water Management (Section 4) plan within the Civils Planning Report sets out detail all SuDS measures and requirements including adherence to DCC policies and sustainable drainage requirements as per Development Plan 2022-2028, in particular Appendices 12 (SuDS Design Guide) and 13 (Surface Water Management Guide)
Include summary table indicating how the surface water and SuDS requirements, including GDSDS key design criteria, have been met.	Section 4.14, Summary Table 4.2 of the Civils Planning Report includes details of surface water and SuDS requirements that have been met.
Recommend reviewing proposed surface water connection; although ideal situation is for separate connections to separate networks – there are concerns around: (1) private connection, public road, sharp bends – MHs are generally provided at any change of direction; (2) potential clash with existing UÉ combined brick	Please refer to the 'LRD Engineering Opinion Response' prepared by TENT engineering. The proposed connection has been agreed with Uisce Eireann/ Irish Water as is demonstrated by the SODA and COF submitted with this application.

culvert & risk of damage; (3) this is a busy road and junction. A combined outfall can be considered if applicant justifies adequately and demonstrates why separate connections are not feasible and Uisce Éireann approve.	
SuDS proposals are not integrated with the Landscaping proposals – drawings are not consistent between the disciplines.	All drawings are now full co-ordinated between disciplines and we refer to the civil engineer and landscape plan in this regard.
Drawings: compass points to be shown.	Compass points are now shown on all drawings.
Piled walls: show on a separate drawing and provide more details of same.	King Post Wall Layout drawing by Tent Engineering has been provided.
Provide drawing showing basement outline relative to proposed ground floor level layout.	Basement outline now showing on site layout drawing as well as the civil engineering drawings (PROPOSED DRAINAGE INFRASTRUCTURE - GROUND FLOOR, WATERMAIN LAYOUT, SURFACE WATER LAYOUT)
Basement Impact Assessment BIA may need updating. BIA was not comprehensively reviewed prior to stage 2 meeting and the outcome of any external audit should not be pre-empted. DCC currently have external consultants to audit BIAs submitted with planning applications. However, DCC could consider having an audit of draft documents carried out, prior to lodging a planning application, should applicant request. A non-Technical Summary is required also.	Basement Impact Assessment has been updated to include a revised Ground Movement Analysis carried out by Ayesa (previously known as Byrne Looby).
Archaeology	
The applicant shall consult with the City Archaeologist in preparing a full Archaeological Assessment, as defined in the Framework and Principles for the Protection of Archaeological Heritage (1999) for submission to the Planning Authority with the S3 LRD application.	IAC have completed an Archaeological Assessment in accordance with the Framework and Principles of Archaeological Heritage (1999). The Dublin City Archaeologist was contacted on the 29th August 2024 for any other observations on the proposed development.
The application shall detail the retention, conservation and presentation of historic boundary walls within the new development as outlined in the submitted S2 Architectural Heritage Impact Assessment.	As described in detail in the Architectural Heritage Impact Assessment by Molloy Associates the boundary walls will be retained, conserved and presented through appropriate landscaping. The presentation of same walls within the scheme will be secured with new structures set back at a distance, encouraging their visual appreciation in the communal areas .
An interpretation strategy for the archaeology and history of the landscape to be submitted for agreement with the planning authority, including signage and / or landscape design.	Please refer to the LRD Opinion Response Letter prepared by Molloy & Associates Conservation Architects which responds to this item. As set out in the Architectural Heritage Impact and Archaeological Assessments, historic granite walled boundaries considered to be the remains of 19th century wall depicted on the 1st edition OS Map, exist in various forms to the

	north and west of the site. A lower wall of similar composition has been extended with mass concrete to the southwestern boundary. There are a number of later/ recent interventions since the construction of these walls, and they are in varying condition. The walls served as garden boundaries to properties adjacent, and latterly the Gowan Motor Compound site, and are not as a consequent attached to a historic demesne. As such the Architectural Heritage Impact Assessment has proposed interventions to ensure their conservation and long-term protection. NMP Landscape Architects, as shown in the drawing titled General Arrangement Plan, have proposed a landscaping strategy including low level planting and hedges in front of the walls to provide ample space for their continued maintenance and visual presentation within the shared garden. However, given the nature and history of the walls, it is not deemed necessary to include any signage as they are not associated with any figures or locations/ properties of historic importance. The proposed landscape design is considered sufficient in line with this opinion item.
Conservation	
No further documentation required.	Noted
Parks, Biodiversity and Landscape Services	
Arboriculture	
The Arboricultural survey shall be revised with a measured tree canopy. The location of the proposed building façade shall be assessed for impact on the tree canopy. Details of tree trunk protection measures shall be included.	The Tree Protection Plan and the Tree Survey have been updated to show the tree canopy extent. The proposed building façade has been reviewed and the tree has been assessed in the context of the proposed building. It is noted that there was historically a building adjacent to this tree which has now been demolished. It is also noted that existing services run around the tree routes. It is considered, having reviewed the services drawings along with the elevations that the tree due to its size and shape will be impacted in a minor way. However, with appropriate tree management practices, including regular pruning, there will be no impact / similar impact to the previous relationship with the now demolished buildings on this tree in the longterm.

	It is also noted that this tree is also due for removal as part of the BusConnects improvements plan which is expected to be implemented in the next year to 18 months. If the BusConnects is implemented in full this tree will be removed before this proposed building is occupied. If retained, the street tree shall be protected by protective fencing and/or trunk wrapping during the course of any site development works. Refer to Appendix 2 of the Arborist Report for examples of suitable Tree Protection Root Barriers. Refer also to the Tree Root Protection Plan drawing ref: TMS.LD.05.24.02A. Refer also to BS 5837:2012 paragraph 6.2 - Barriers and Ground Protection. Great care shall be exercised during the demolition and construction phase to protect the tree. Damage to tree roots or stem structures will be avoided
All proposed services shall be positioned externally to the root protection area of the existing street tree. Current alignment as below image (water main layout overlay with master landscape plan) is not acceptable.	All services now clear of tree root protection area. (see drawings: PROPOSED DRAINAGE INFRASTRUCTURE - GROUND FLOOR, WATERMAIN LAYOUT, SURFACE WATER LAYOUT)
Provide accurate tree position and tree RPA on all engineer's services drawings.	Tree position and tree RPA now showing on all engineer's services drawings (see drawings: PROPOSED DRAINAGE INFRASTRUCTURE - GROUND FLOOR, WATERMAIN LAYOUT, SURFACE WATER LAYOUT)
Communal Open Space	
The landscape report shall schedule the required area of COS and the proposed COS area.	Please refer to the Landscape Design Report by NMP. The quantities for the communal open space are shown in a table format in this report under (4.0 - Landscape Design Concept - 4.3 - Communal Open Space). Also, in this section lies a text description of the outdoor communal open space. The total communal open space for the development will reach 1,232.88m2. Out of this, 820m2 will comprise of outdoor communal space. This will be broken into 77m2 for the lower communal terrace. The ground floor terrace will comprise of 743m2. Indoor communal space will be 412.88m2.

	The total communal space for the development exceeds the required 1,000m2 for the development.
The landscape design shall be reviewed with assessment of daylight /sunlight.	Please refer to the Landscape Design Report by NMP. The revised landscape proposal for the development has taken into consideration daylight / sunlight. The ground level external space is in excess of the minimum recommendations for Sunlight in Amenity Areas. Please refer to the Daylight Assessment prepared by ARUP for further information
An active recreation zone shall be included including half-basketball and external gym units.	Please refer to the Landscape Design Report by NMP. The landscape design includes a basketball practice hoop space along with an outdoor gym space
Materials	
The scheme shall allow 50% of all external seating to have arm & back rests which shall be referenced in the landscape submission.	Please refer to the Landscape Design Report by NMP. 50% of all external seating will have arm and back rests as required.
The scheme shall allow 50% of external cycle stands to be covered.	Please refer to the Landscape Design Report by NMP. Bicycle parking is integrated throughput the proposed development including external bike stands, 50% of which will be covered.
Biodiversity	
An appropriate assessment screening report and biodiversity enhance plan (BEP) shall be submitted as part of the application. The BEP shall recommend measures to enhance urban biodiversity such as habitat creation, installation of bat boxes & swift boxes and biodiverse green roofs.	Please refer to the AA Screening and Biodiversity Management Plan prepared by Altemar. The AA Screening concludes that*: "Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that the proposed development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites."* The Biodiversity Enhancement Plan has been prepared by Altemar with the support of NMP Landscape Architects. It involves the implementation of biodiversity enhancement measures across the development. The proposed planting schedule outlines the heavy reliance on native and pollinator friendly

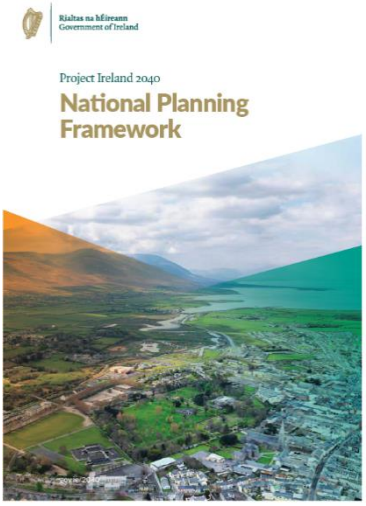
	species and the incorporation of bird boxes (swift), habitat complexity and bat boxes. The landscape elements of the proposed project have involved consultation and reiterations of the landscape masterplan, to enhance biodiversity across all landscape components on site. These biodiversity enhancement measures are outlined and will be implemented.
Green Roofs	
A green roof plan shall be submitted. The applicant shall note the requirements of DCC's Green Blue Roof Guide.	Please see the Surface Water Layout Drawing and the Proposed Drainage Infrastructure Drawing by Tent Engineers. These drawings indicate the green blue roof plans within the development. These have been designed in accordance with the requirements of DCC's Green Blue Roof Guide.
Other Documents Required as outlined above	
The relevant required documentation as set out in Table 15.1 of the Dublin City Development Plan 2022-2028 Planning Application Documentation – Planning Thresholds shall be provided in addition to the specified reports required above and as outlined in the applicant's Stage 2 Planning Letter.	This is noted. Table 15.1 has been reviewed and all relevant documentation has been provided. Please see the list of enclosures included with this application.

PLANNING POLICY CONTEXT

PROJECT IRELAND 2040: NATIONAL PLANNING FRAMEWORK

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland. The Eastern and Midland Region (including Dublin) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

The NPF Strategy includes the following aims:



- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- 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.

The NPF shifts Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located and requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope' through infill and brownfield development. The emphasis is on renewing and developing existing settlements and aims to prevent the continual expansion and sprawl of our cities.

This aim for Compact Growth promotes "*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.*" This approach not only makes better use of land but it can also have a "*transformational difference*" to towns and villages bringing new life and footfall to an area and contributing to the viability of services, shops and public transport, and by increasing the housing supply, enables more people "*to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less*" (Section 2.6).

As a result of this new policy approach, and as set out in Section 4.5 there is a recognition that infill and brownfield development is more challenging to deliver across multiple streams including land management and integration within existing communities who prefer the status quo to be maintained. As a result, to enable brownfield development a flexible approach to planning policies and standards needs to be "*focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases… planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes*." Section 4.5 highlights that "*general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor,*

outer suburban, town, village etc." It highlights that there "*should also generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five."*

The implementation of the National Planning Framework aims "*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*" and also accommodate increased scale and height of development in our town and city cores, including an appropriate mix of living, working, social and recreational space. It has a number of directly relevant national policy objectives to this site that articulate delivering on a compact urban growth programme. These include:

- *National Policy Objectives (NPO) 2(a) relating to growth in our cities;*
- *NPO 3(a)/(b)/(c) relating to brownfield redevelopment targets;*
- *NPO 5 relating to sufficient scale and quality of urban development;*
- *NPO 6 relating to increased residential population and employment in urban areas;*
- *National Policy Objective 4*
  Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- *National Policy Objective 13*
  In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.
- *National Policy Objective 11*
  In meeting urban development requirements, 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, subject to development meeting appropriate planning standards and achieving targeted growth.
- *National Policy Objective 27*
  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.
- *National Policy Objective 33*
  Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- *National Policy Objective 35*
  Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

We note that 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."*

EVALUATION OF CONSISTENCY

The subject site is located within a suburban location south of Dublin City, which is identified for significant residential growth over the next two decades.

The site is well connected to excellent public transport services, with Sydney Parade Dart Station located c. 900m or a 10-minute walk away (or 570m as the crow flies). Dublin Bus services 4, 7, 7A, 7D and 84A operate along Merrion Road with a stop located directly north of the subject lands. These connect the site to Dublin City Centre, Monkstown, Brides Glen, Bray, Greystones and Mountjoy.

The proposed development seeks to deliver a significant quantum of Purpose-Built Student Accommodation at a site that is located within a well-established area, and within walking distance of a multitude of services, exceptional public transport options and very good local amenities. The proposed development is considered in line with the Governments guidance for compact city development and ensures sustainable development in this well serviced suburban area.

DRAFT REVISED NPF (JULY 2024)

The draft revised NPF was published for public consultation in July. It sets out a requirement for the construction of at least 50,000 new homes per year based on Census 2022 data and growth projections. This is a substantial uplift on the 33,000 per annum housing target set out by the Government's Housing for All Plan. The draft document states in relation to student accommodation 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****. Student accommodation also contributes to the financial, cultural and social fabric of regions, cities and towns. The adaptive reuse of existing buildings and brownfield sites for student accommodation can assist with the reduction of vacancy and dereliction, thereby promoting vitality and vibrancy in settlements, in support of Town Centre First principles. The National Student Accommodation Strategy supports these objectives."* (Our emphasis).

EVALUATION OF CONSISTENCY

The Draft NPF identifies the continued and growing need for additional high-quality purpose built student accommodation in order to address the current housing needs at a national level.

The proposed development makes best use of an existing brownfield site at an accessible location in close proximity to SVUH and UCD and will remove this vacant site from the Merrion Road.

In respect of providing additional housing, assisting with the 50,000 new homes target, the proposed PBSA can make a positive contribution to the increased housing targets under the revised NPF.

HOUSING FOR ALL – A NEW HOUSING PLAN FOR IRELAND 2021

The Government's 'Housing for All – A New Housing Plan for Ireland' published in September 2021 sets out a series of key pathways to delivering a sustainable housing system in the period to 2030

ensuring that '*everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life*'.

It identifies that Housing is required to satisfy demand for housing across four tenures: affordable, social, private rental and private ownership, and should be '*advanced through the planning process and built within the context of specific development targets for the five cities and major towns'*.

The Plan specifically mentions the provision of purpose-built student accommodation and notes that this '*can alleviate pressure on the private rental market'* and supports the '*diversification of housing stock and increase availability of rental stock by supporting the development of Purpose-Built Student Accommodation'.*

EVALUATION OF CONSISTENCY

The proposed development will contribute to increasing new housing supply and enhancing the availability of rental stock in the housing market by the provision of Purpose-Built Student Accommodation in close proximity to a third level institution.

REGIONAL SPATIAL AND ECONOMIC STRATEGY 2019- 2031

Under the Local Government Reform Act 2014 the Regional Planning Framework has been revised with the previous Regional Authorities/Assemblies (ten in total) now replaced with three Regional Assemblies. The Regional Authorities for the Greater Dublin Area – The Dublin Region and the Mid-East Region - have been replaced by the Eastern and Midland Regional Assembly.

The RSES will support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP). It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change. The vision for the RSES is 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.

To this end the RSES supports the consolidation and redevelopment of infill, and brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin city and suburbs.

EVALUATION OF CONSISTENCY

The subject development seeks to provides for a student accommodation development on a key urban infill site. The proposed density, height and scale is similar to that of the previously permitted scheme and is in line with the aims of the RSES to increase densities, heights and urban consolidation in inner suburban location. The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.

Urban Development & Building Heights: Guidelines for Planning Authorities, 2018

The Guidelines are intended to set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is a presumption in favour of high buildings at public transport nodes and state

that it is Government policy to promote increased building height in locations with good public transport services.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their function. SPPRs as stated in the Guidelines, take precedence over any conflicting, policies and objectives of development plans, local areas plans and strategic development zone planning schemes.

The Guidelines emphasis the policies of the NPF to increase levels of residential development in urban centres and increase building heights and overall density by both facilitating and encouraging the development of increased heights and densities by Local Authorities and An Bord Pleanála. It identifies the need to focus planning policy on *"reusing previously developed "brownfield" land, building up urban infill sites".*

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks:
"*In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors*".

It goes on to highlight that "*the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights*".

It encourages local authorities away from setting generic maximum height limits across their functional areas identifying "*such limits, if inflexibly or unreasonably applied, can undermine wider national policy objectives to provide more compact forms of urban development as outlined in the National Planning Framework and instead continue an unsustainable pattern of development whereby many of our cities and towns continue to grow outwards rather than consolidating and strengthening the existing built up area. Such blanket limitations can also hinder innovation in urban design and architecture leading to poor planning outcomes."*

They place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks.

"*In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors*". It goes on to highlight that "*the preparation of development plans, local areas plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights*".

The following summaries the compliance of the proposed development with the Development Management Criteria for assessing increased building height outlined in Section 3.2 of the Guidelines:

	Evaluation Of Consistency
SPPR 1 Support increased building height and density in locations with good public transport accessibility to secure the objectives of the NPF and RSES and shall not provide for blanket numerical limitations on building height.	The proposal of up to 6 storeys (with Block A, fronting onto Merrion Road, lower than the permitted development) and is served by excellent public transport, c. 900m of Sydney Parade Dart Station (less than 10-minute walk), a number of bus routes along Merrion Road and is within a c. 15-minute cycle to the City Centre. The excellent sustainable transport options that the subject site has to offer gives positive rational for why the site can cater for increased height and density. The proposed development seeks to deliver an appropriate form and scale of residential development (student accommodation) at a site that is located c. 500m south of Merrion Shopping Centre and within 300m of St Vincent's University Hospital and the Elm Park Business Centre, which includes Caritas a Convalescent Centre. The site is well located with respect to a variety of existing leisure amenities, parks, playgrounds, and sports clubs are within a short walk or cycle of the site while it is directly opposite Merrion Strand.
Development Management Criteria Section 3.2: **At the scale of relevant city/town:** -The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	
At the scale of district/ neighbourhood/ street; - The proposal responds to its overall natural and built environment and makes a positive contribution. - The proposal is not monolithic and avoids long, uninterrupted walls of building. - The proposal enhances the urban design context for public spaces and key thoroughfares. - The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies.	The site is bounded to the north by Merrion Road with residential units on the opposite side of the Merrion Road, to the east by residential dwellings (bungalows) which also front onto Merrion Road and are protected structures, to the south by Caritas Convalescent Centre and St. Mary's Nursing Centre to the southeast and to the west by a 4 storey apartment block known as 'Elm Court'. The area surrounding the subject site has undergone significant change in the last decade with numerous large scale, modern tall buildings built within the vicinity of the site. The surrounding area comprises a range of uses such as commercial, residential and medical uses. Immediately to the east, north and west of the site is residential, while to the south is Caritas nursing home. The development will provide for student accommodation associated with St Vincents

	Teaching Hospital. Currently, there are no purpose-built student accommodation facilities within 1km of the site. The proposed development provides 2 no. blocks joined via the basement and range in height from 1 to 6 storeys. The buildings are designed to have a similar footprint to that of the permitted scheme. Block A is 6 storeys in height (but less than that permitted under DCC Reg. Ref. 4051/21) and has been provided with an attractive elevation with a fine grain appearance and a stepping in heights, with the highest element centrally located. Similarly, block B has been relocated to provide a better relationship with the neighbours and also steps in height and has a more varied and visually interesting design. As there are no balconies, due to its proposed use, there will be a reduced perception of overlooking to the adjacent neighbours. The proposed design is considered to make a positive architectural contribution to the character of the area and one which this bespoke site can accommodate. The development is a suitable form and scale of development for this key site within Merrion and will make a positive contribution to the area and redefine the sense of place replacing the unattractive site that is currently in place. The design is not monolithic but incorporates a range of heights and materials which respond to adjoining sites. The elevations have fine grain elements throughout and are broken into separate sections. The proposed scale will help create a better streetscape along Merrion Road and will improve urban legibility. The scheme is divided into two blocks and uses the space within the roof and the shaping of the buildings to ensure that the proposal is not

	monolithic and avoids long, uninterrupted walls of building. The proposed development integrates well with the mixed character and heights of the surrounding area. From street level the residential block is broken up by a mix of materials which have been carefully chosen including large sections of glass, brick, and metal cladding to complement the surrounding architectural diversity of the area. The proposal incorporates step backs at upper levels to minimise the impact of the development when viewed from street level and the neighbouring dwellings.
At the scale of the site/building: - Maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	As per design guidelines, the proposed student accommodation is provided on a 'cluster' type model which will be acceptable in terms of overshadowing and overlooking. Please refer to the Daylight Assessment prepared by ARUP which confirms compliance with BRE Guidance.
Specific Assessments: -Specific impact assessment of the micro-climatic effects such measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered. -Development locations in proximity to sensitive bird/bat areas need to consider the potential interaction of the building location, materials and artificial lighting. -Relevant environmental assessment requirements.	The proposed development, while taller than the surrounding buildings, will not result in a new microclimate in the area due to the small nature of the site. The immediately adjoining sites have building heights ranging from 1 to 4 storeys, the proposed development ranges in height up to 6 storeys, which is a similar scale to the permitted development on site. As the site is currently vacant there is low ecological value associated with the site.
SPPR 3 It is a specific planning policy requirement that where; 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	This proposal for student accommodation is in line with National Plan Policy to make the optimal use of zoned, serviced, vacant and accessible urban land which is appropriately located close to the city centre and in very close to St Vincent's University Hospital which is a teaching hospital and which many of the students will attend. It is also next to existing facilities such as shops and community facilities; major employment hubs and has exceptional public transport accessibility due to its proximity to the several bus routes, and the DART.

objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise.	
Given the above it is considered that the 6 storey proposal accords with the Urban Development and Building Heights Guidelines for Planning Authorities and can be granted in accordance with SPPR 3.	

Building Height

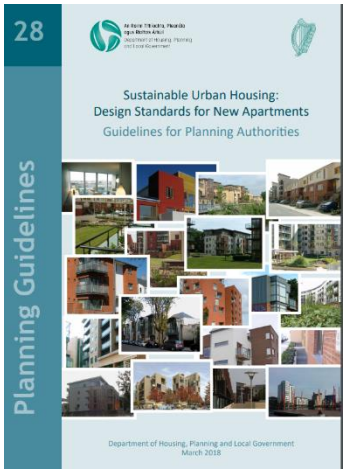
Section 4.5 of Dublin City Development Plan deals with "Increased Height as Part of the Urban Form and Spatial Structure of Dublin". In section 4.5 it acknowledges that "*Aligned with the principle of greater densification, will be the requirement to consider greater height in appropriate locations. … Appropriate higher density schemes can often be achieved by using mid-rise typologies and key to the success of such development is high quality design and place-making.*"

The graduated heights compliment the design of the surrounding of the neighbouring properties and the varied nature of the buildings in the surround area. Given its highly accessible location and the surrounding area it is considered an appropriate site for higher development in line with Policy SPPR 3 of the Urban Development and Building Heights: Guidelines for Planning Authorities December 2018, and also supporting policy in the Apartment Guidelines and the National Development Plan.

The development is of a similar height, bulk and scale to other schemes in the surrounding area. Block A is a decrease in height from the permitted development DCC Reg. Ref. 4051/21 while Block B is a slight increase but recessed further back. These amended heights are considered to be fully in keeping with the permitted scheme and the proposals of the development plan.

The top floors of the student blocks have been set back reducing their visibility from the street and reducing the bulk of the building. These setbacks have the additional benefit of minimising overshadowing and overlooking to the surrounding properties.

SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS 2023



The Apartment Guidelines 2023 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland. These guidelines replace the Sustainable Urban Housing: Design Standards for New Apartments 2020. These guidelines aim to:

Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;

Make better provision for building refurbishment and small-scale urban infill schemes; and

Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs.

The Apartment Guidelines 2023 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

This document identifies that site within Central and/or Accessible Urban Locations[2] such as the subject site are generally suitable for small to large scale, higher density development, that may wholly comprise apartments.

These guidelines, in accordance with The National Planning Framework move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance-based standards to ensure well-designed high quality outcomes and advises that general blanket restrictions on building height or building separation distances that may be specified in development plans, should be replaced by performance criteria, appropriate to location. It recognises the need for greater flexibility in order to achieve significantly increased apartment development in Ireland's cities. This increase in density and height is therefore in accordance with the policies set out in this document.

Section 4.21 identifies that in Accessible Urban Locations such as this one, in *"larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.*" This scheme has reduced the car parking in this development significantly in line with this policy. The accessibility of this site due to the confluence of public transport systems including the DART and bus located in close proximity enable this scheme to have this reduced parking level.

We note that in relation to student accommodation, Section 2.21 states that the mix parameters set out in SPPR1 do not apply to purpose-built student accommodation. Section 3.5 of the guidelines also states that the floor parameters as set out in SPPR3 do not apply to purpose-built and managed student accommodation.

EVALUATION OF CONSISTENCY

The subject site is located within an Accessible Urban Location due to its proximity to high-capacity urban public transport stop in the form of the DART along with its accessibility to a high frequency bus route both of which are within 9 minutes' walk of the site. The Apartment Guidelines note that these locations are generally suitable for small to large scale (which will vary subject to location), and higher density development that may wholly comprise of apartments. As such this site is an appropriate location for higher density development.

Guidelines For Planning Authorities on Sustainable Residential Development In Urban Areas, 2009

The guidelines set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas.

The Guidelines elaborate a range of high-level aims for successful and sustainable residential development in urban areas. These are assessed against the proposed scheme as follows:

	EVALUATION OF CONSISTENCY
Prioritise walking, cycling and public transport, and minimise the need to use cars;	Pedestrian and cyclist access to the site has been prioritised with minimal vehicular access to the site. Please see the Traffic Impact Assessment prepared by TENT enclosed with this application.
Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;	The scheme has been designed in accordance with all relevant quantitative and qualitative residential standards as set down in the Dublin City Development Plan. Future residents will live in a uniquely safe residential environment with outdoor space largely free of cars and a multitude of access options to social infrastructure, open spaces and public transport in the area.
Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;	The development will consist of 200 no. student accommodation bedspaces with 1232.88sqm of Communal Amenity Space. 412.88sqm is provided internally and includes a reception area, lobby, parcel and laundry room, student residents' lounge, co-working space, multi-purpose gym/studio. 820sqm of communal space is provided externally and includes a communal lawn, an external gym and a basketball practice hoop. The development is well located in relation to existing/planned social infrastructure in the area with local retail, public open space and community facilities within c. 10 minutes' walk.
Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;	The layout of development has been designed to enhance the accessibility of the site. All of the routes through the development will provide increased connectivity to the area which is well surveilled and overlooked. The public realm proposed is high quality with a range of different spaces meeting varying needs throughout the development.
Are easy to access for all and to find one's way around;	There is one access point to the east of Block A for pedestrian and cyclist access and vehicular drop offs. The layout is logical, interesting and wayfinding uncomplicated. There is an accessible car parking space located within the scheme.
Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;	The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current buildings regulations.
Provide a mix of land uses to minimise transport demand;	The proposed development purpose-built student accommodation. Support services in terms of the residential facilities with high quality outdoor spaces are also provided. The scheme is within c. 10 minute walk of a wide range of high frequency bus services and the dart. It is

	accessible to a variety of existing facilities and St Vincents University Hospital and UCD.
Promote social integration and provide accommodation for a diverse range of household types and age groups;	The scheme provides 200 bedspaces of purpose-built student accommodation in the form of 199 no. 1 beds (including 4 no. accessible rooms) and 1 no. studio. This will improve the overall mix in the wider area which comprises a large proportion of 3+ bed houses at present.
Enhance and protect the green infrastructure and biodiversity; and	The site comprises a brownfield which has been cleared and all demolition work has been completed in line with the permitted development DCC Reg. Ref. 4477/19 and 4051/21. The proposal includes for landscaping that will significantly improve the biodiversity value on the site. A biodiversity enhancement plan has been prepared by an ecologist in conjunction with the landscape architect to enhance biodiversity across all landscape components on site.
Enhance and protect the built and natural heritage.	The proposed development does not have any protected structures on the site. An archaeological assessment has been carried out and is submitted by IAC. This assessment concludes that the western and southern boundary walls will be retained as part of the proposed development and subject to conservation works as detailed in section 2 of the Architectural Heritage Assessment. This represents a positive impact on the surviving heritage in the area. No further archaeological mitigation is required for the boundary walls, as they will be retained and conserved as per the Architectural Heritage Assessment (Molloy & Associates). The Architectural Heritage Impact Assessment prepared by Molloy & Associates concludes that *"The proposed development, addressing a busy road, seeks to construct an infill building of scale between two lower scaled, established, building groups of heritage interest. Its modulated form introduces flexibility at boundaries shared with both groups, enabling it to better integrate with what is an inconsistent, but acceptably diverse streetscape, reflecting both the rhythm of extant fenestration and pitched roof typologies dominant in the vicinity. The resulting scheme in its dynamic interpretation of common local characteristics, blends successfully with its environs and introduces an enrichment that does not dominate either the setting or character of buildings of heritage interest adjacent."*

Urban Design Manual – A Best Practice Guide, 2009

The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful

neighbourhoods having regard to the 12-point criteria. The proposal complies with the following design criteria:

1. Context –How does the development respond to its surroundings?	
	EVALUATION OF CONSISTENCY
The development seems to have evolved naturally as part of its surroundings.	The proposed development accords with the zoning objectives of the DCC development plan to provide for student accommodation. This development naturally evolves as the site is located within c.250m of St Vincent's University Hospital (SVUH). Providing student accommodation which would allow students studying in SVUH live within close proximity of their educational facility. The proposed scale and layout of development now proposed seeks to further exploit these natural assets to create a highly attractive PBSA development that at the same time optimises the return on zoned and serviced land so close to high quality and highly efficient public transport and planned services. Please refer to the local planning policy assessment for more information on how the proposed development accords to the zoning.
Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users. *Form, architecture and landscaping have been informed by the development's place and time.*	The proposed density is in accordance with National Planning Policy which encourages the site to make the best use of zoned land. The context of the site makes it particularly suitable for higher density residential development given the proximity to the SVUH, the City Centre, frequent bus services, services and employment centres within Merrion and Blackrock. The proposal reflects the significant increases in densities and scale achieved along high-quality public transport corridors such as Dublin Bus Routes. The proposed development also reflects national policy for consolidated urban development and higher densities and scale on accessible and well serviced urban sites throughout Dublin City as promoted in the NPF and the RSES. The current proposal is a student accommodation development that is modern not just in terms of design and density but also in terms of promoting an attractive living environment with significant and safe open spaces for future residents.

The development positively contributes to the character and identity of the neighbourhood.	The proposal is a striking design and layout which optimise this infill site and will enhance and develop the character of this residential area. It will remove a vacant, underutilised site and transform it with a development that will contribute positively to the neighbourhood in terms of increased population and wider, more sustainable residential mix.
Appropriate responses are made to the nature of specific boundary conditions.	The development has been designed with regard to the existing boundary features, particularly the siting of the development.

2. Connections – How well connected is the new development	
	EVALUATION OF CONSISTENCY
There are attractive routes in and out for pedestrians and cyclists.	The development is connected directly to Merrion Road. The landscaping of the site provides for route which run between the proposed blocks allowing for greater permeability for residents around the site within a car free environment.
The development is located in or close to a mixed-use centre.	The scheme will be located within a 10 minute walk of local services located in Merrion Shopping Centre, a 23 minute walk to Donnybrook Shopping Centre.
The development's layout makes it easy for a bus to serve the scheme.	The site is well connected to excellent public transport services, with Sydney Parade Dart Station located c. 900m or a 10-minute walk away (or 570m as the crow flies). Dublin Bus services 4, 7, 7A, 7D and 84A operate along Merrion Road with a stop located directly north of the subject lands. These connect the site to Dublin City Centre, Monkstown, Brides Glen, Bray, Greystones and Mountjoy.
The layout links to existing movement routes and the places people will want to get to.	Dedicated and safe pedestrian/cyclist permeability through and around the site is enshrined in the specific design and layout proposed.
Appropriate density, dependent on location, helps support efficient public transport.	The density accords with national guidelines which promote higher density development in established residential areas close to high quality public transport and local services. The provision of zero private car parking within this scheme also enables this development to support the efficient use and maximise the sustainable use of public transport.

3. Inclusivity – How easily can people use and access the development?	
	EVALUATION OF CONSISTENCY
New homes meet the aspirations of a range of people and households.	The existing residential units are predominantly large family houses with a poor typology mix to meet current/future needs of a diversifying population. The proposed scheme will provide purpose built student accommodation which, as is widely acknowledged Dublin City faces a significant shortage of supply. The proposal will cater to those working and studying within SVUH.
Design and layout enable easy access by all.	The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations.
There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.	The scheme will provide a variety of open spaces, and communal internal facilities to suit the needs of students.
Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.	There is no public open space proposed as part of this development.
New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.	The layout presents attractive urban edges to the open spaces proposed that will be supervised and overlooked.

4. Variety – How does the development promote a good mix of activities?	
	EVALUATION OF CONSISTENCY
Activities generated by the development contribute to the quality of life in its locality.	The proposal will provide for a much more sustainable housing mix within the area and will increase population creating additional demand for educational, sports and retail services all of which are provided close to the development.
Uses that attract the most people are in the most accessible places.	A variety of open spaces are provided throughout the scheme and will be easily accessible to the students.
Neighbouring uses and activities are compatible with each other.	The area is characterised by student accommodation uses; as such the proposed use is compatible with the surrounding area.

Housing types and tenure add to the choice available in the area.	The proposal provides for PBSA which there is a critical shortage of within the area. The surrounding area currently is dominated by 3+ bedroom houses. Please refer to the accommodation schedule for more information.
Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.	The scheme will be located within 10 minutes walk of the Merrion Shopping Centre which provides a range of retail facilities an amenities.

5. Efficiency - How does the development make appropriate use of resources, including land?	
	EVALUATION OF CONSISTENCY
The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.	The overall density is considered appropriate for this site given the proximity to public transport and social infrastructure.
Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.	The restriction on parking enables more landscaping. As a result, significant communal open space will be provided across the entire scheme incorporating SuDS, promoting biodiversity and providing residential amenity.
Buildings, gardens and public spaces are laid out to exploit the best solar orientation.	All units and open spaces will enjoy sufficient sunlight and daylight provision. This is further demonstrated by the Daylight Assessment Report prepared by ARUP.
The scheme brings a redundant building or derelict site back into productive use.	Currently, the site has been cleared and all demolition work has been completed in line with the permitted development DCC Reg. Ref. 4477/19 and 4051/21. This scheme will bring this site back into a productive use.
Appropriate recycling facilities are provided.	Communal recycling facilities are provided in the bin stores strategically located proximate to each block.

6. Distinctiveness - How do the proposals create a sense of place?	
	EVALUATION OF CONSISTENCY
The place has recognisable features so that people can describe where they live	The proposal is designed to be an attractive, bespoke compact development, with high quality amenity. The architecture is simple yet contemporary and proposed

and form an emotional attachment to the place.	materiality, such as pavement, planters, the use of metal at the canopy entrance, selection of coloured brick, and render, will further enhance the identity of the place.
The scheme is a positive addition to the identity of the locality.	The site is currently a vacant brownfield site. The proposal will provide an appropriate scale and quantum of residential development on a key site directly adjoining efficient public transport.
The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.	The topography including the surrounding residential buildings have all been considered with the design of the proposed development and its response to the surrounding area in scale and height. The proposed layout adapts to the site boundaries and existing buildings surrounding the site. The proposed buildings have been strategically designed within the site in order to reduce their impact on the adjoining houses and character of the area whilst placing a focus on enhancing the density of the site. The buildings vary in height between 1 and 6 storeys with lower heights in close proximity to existing buildings and increased heights to the Merrion Road. The buildings are laid out to allow optimum light penetration into the spaces whilst the blocks also have views onto open spaces throughout the development.
The proposal successfully exploits views into and out of the site.	The spaces either side of Block A along Merrion Road will create an open and visually permeable development. This maintains view to, though and from the site. The height and design of the buildings will result in an attractive, legible route though the site, making way finding easy.
There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.	The open space upon entering the site will be the focal point to the overall development. It creates an amicable first impression to visitors upon arrival and opens the space.

7. Layout - How does the proposal create people friendly streets and spaces?	
	EVALUATION OF CONSISTENCY
Layout aligns routes with desire lines to create a permeable interconnected series	Pedestrian permeability across the scheme is a key outcome.

of routes that are easy and logical to navigate around.	
The layout focuses activity on the streets by creating frontages with front doors directly serving the street.	The building blocks provides frontages that contributes to passive surveillance of the open spaces within and external to the scheme along pedestrian access paths. The design and shape of the blocks also encourages multiple viewpoints of the open space to the rear, ensuring the passive surveillance is achieved. Bicycle Parking is provided at basement and ground floor level. A single vehicular access in and out is provided with a low traffic speed environment secured. The cars at surface level are restricted to ensure a predominantly car free environment.
The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.	
Traffic speeds are controlled by design and layout rather than by speed humps.	
Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.	The open space strategy for the scheme creates multiple open spaces of varying uses and sizes. This can be seen in the landscaping strategy by NMP Landscape Architects.

8. Public Realm - How safe, secure and enjoyable are the public areas?	
	EVALUATION OF CONSISTENCY
All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.	All spaces are well distributed and overlooked and surveilled by surrounding blocks.
The public realm is considered as a usable integrated element in the design of the development.	Creation of a predominately car fee public realm for pedestrians and cyclists to traverse unhindered is a key design outcome and will create a unique residential development in this part of the city. The landscaping and design of the public realm can be solely dedicated to providing the optimum amenity for residents and visitors.
Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.	The proposed development is for a Purpose-Built Student Accommodation and therefore a children's Play Area is not proposed.
There is a clear definition between public, semi-private, and private space.	The proposed development is for a Purpose-Built Student Accommodation and therefore public and private open space is not proposed. The proposal includes for a communal open space which is clearly defined as such.

Roads and parking areas are considered as an integral landscaped element in the design of the public realm.	Within this unique scheme the private car is entirely restricted to 1 set down area and 1 accessible car parking space allowing a car free open space realm elsewhere in the scheme.

9. Adaptability - How will the buildings cope with change?	
	EVALUATION OF CONSISTENCY
Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.	n/the proposal is for Purpose Built Student Accommodation.
The homes are energy-efficient and equipped for challenges anticipates from a changing climate.	Yes, design practices and proposed materials will militate against the effects of climate change.
Homes can be extended without ruining the character of the types, layout and outdoor space.	n/the proposal is for Purpose Built Student Accommodation.
The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.	n/the proposal is for Purpose Built Student Accommodation.
Space in the roof or garage can be easily converted into living accommodation.	n/the proposal is for Purpose Built Student Accommodation.

10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?	
	EVALUATION OF CONSISTENCY
Each home has access to an area of useable private outdoor space.	The proposed development is for a Purpose-Built Student Accommodation and therefore private open space is not proposed. The proposal includes for a communal open space which is clearly defined as such.
The design maximises the number of homes enjoying dual aspect.	The student accommodation units are designed to maximise the number of homes enjoying dual aspect.
Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.	All clusters will be designed to prevent sound transmission in accordance with building regulations.
Windows are sited to avoid views into the home from other houses or the street and	Adequate separation distance between opposing windows is achieved and overlooking is not

adequate privacy is affordable to ground floor units.	considered an issue of the development particularly in relation to adjoining existing buildings.
The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.	All bedrooms are designed to provide adequate amounts of storage.

11. Parking – How will the parking be secure and attractive?	
	EVALUATION OF CONSISTENCY
Appropriate car parking is on-street or within easy reach of the home's front door.	The proposed student accommodation does not contain any car parking, with the exception of 1 no. accessible car parking space and 1 no. drop down space. This is in line with current NPF policy. Please see the Traffic and Transport Assessment for further details.
Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.	The proposed accessible car parking space is visible from the blocks.
Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.	n/a - The proposed student accommodation does not contain any car parking, with the exception of 1 no. accessible car parking space and 1 no. drop down space. These spaces are provided communally.
Materials used for parking areas are of similar quality to the rest of the development.	Yes, the highest quality materials will be used throughout the scheme.
Adequate secure facilities are provided for bicycle storage.	Dedicated bicycle parking is provided throughout the scheme in line with the Design Standards for New Apartments and cycle standards.

12. Detailed Design – How well thought through is the building and landscape design?	
	EVALUATION OF CONSISTENCY
The materials and external design make a positive contribution to the locality.	The proposed development uses a controlled palette of materials please see the architect's drawings.
The landscape design facilitates the use of the public spaces from the outset.	The open spaces will be provided once the two Blocks are completed.

Design of the buildings and public space will facilitate easy and regular maintenance.	This can be achieved and will be provided by the student accommodation management company.
Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.	Parking is limited in favour of providing high quality landscaped open space.
Care has been taken over the siting of flues, vents and bin stores.	Bin stores are located discretely around the site. No other flues or vents are proposed.

SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENT, GUIDELINES FOR PLANNING AUTHORITIES, 2024

The Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Act in 2009, which in turn replaced the Residential Density Guidelines issued in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

It is intended that the Sustainable Residential Development and Compact Settlement Guidelines will be accompanied by a Design Manual that will provide best practice guidance on how the policies and objectives of the guidelines can be applied. At the time of submitting this LRD Planning Application, the accompanying Design Manual has not been published, therefore the proposed development is assessed against the 2009 Urban Design Manual as set out within this Statement of Consistency.

Section 1.3.2 of the Guidelines relating to Compact Growth state that *"priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out. There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens".*

Chapter 3 of the guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. Under this categorisation, as set out in Table 3.1 – Area and Density Ranges Dublin and Cork City and Suburbs, this site would be considered a City – Urban Neighbourhood.

The 'City – Urban Neighbourhoods' category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land

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

Section 3.4 provides further advice on *Refining Density* and includes a two step process. Step 1: Consideration of Proximity and Accessibility to Services and Public Transport. This identifies that *while densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations. Densities above the ranges are 'open for consideration' at accessible suburban and urban extension locations to the maximum set out in Section 3.3.*

Table 3.8 (below) sets out definitions for terms used to define accessibility to allow for consistent application. The characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required.

High Capacity Public Transport Node or Interchange
• Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail[11], light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'[12] stop.
• Highest densities should be applied at the node or interchange and decrease with distance.
• 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.
Accessible Location
• Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.
Intermediate Location
• Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and
• Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.
Peripheral
• Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

Section 3.2.1 provides a methodology to assist planning authorities in appropriately integrating national planning policy in relation to settlement growthand residential density into statutory development plans and in the assessment of individual planning applications. Footnote 3 states that *When calculating net densities for shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling.*

EVALUATION OF CONSISTENCY

Based off the calculation of four bed spaces accounting for one dwelling when calculating net density, the proposal would result the equivalent of 50 apartments or a density of c.178 units per hectare is considered appropriate at this location. This is comparable to the permitted development DCC Reg. Ref. 4051/21 which provided 46 apartments.

The proposed development is considered highly accessible in terms of public transport.

Overall, it is considered that the proposed student accommodation will provide a high-quality scheme in line with the Sustainable Compact Guidelines.

Section 4.4 Key Indicators of Quality Design and Placemaking Assessment

Key Indicators	Evaluation of consistency
Sustainable and Efficient Movement In order to meet the targets set out in the National Sustainable Mobility Policy 2022 for reduced private car travel and increased active travel, it will be necessary to design settlements at every level to support the transition away from private car use and to support ease of movement for pedestrians, cyclists and public transport. Local authorities should plan for the development of well-connected neighbourhoods and a distribution of activities to ensure that day-to-day services and amenities are accessible within walking distance of homes and workplaces. In addition to sustainable travel objectives, this will ensure that settlements are vibrant, and when applied alongside the principles of Universal Design, will allow vulnerable users to move about and access services with ease.	Noted. The proposed development is considered highly accessible in terms of public transport.
The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.2 also refers): (a) New developments should, as appropriate, include a street network (including links through open spaces) that creates a permeable and legible urban environment, optimises movement for sustainable modes (walking, cycling and public transport) and is easy to navigate.	This proposed development creates an attractive, highly permeable urban environment.
(b) New developments should connect to the wider urban street and transport networks and improve connections between communities, to public transport, local services and local amenities such as shops, parks and schools, where possible.	The proposal also has ease of access to existing local services. The provision of a high ratio of cycle parking and a lower ratio of car parking will encourage a modal shift to active travel.

(c) Active travel should be prioritised through design measures that seek to calm traffic and create street networks that feel safe and comfortable for pedestrians and cyclists. (d) The quantum of car parking in new developments should be minimised in order to manage travel demand and to ensure that vehicular movement does not impede active modes of travel or have undue prominence within the public realm. Chapter 5 Development Standards includes a specific planning policy requirement (SPPRs) that addresses car parking rates in new residential developments.	Cars are minimised within the development in line with this policy. The development is a car free scheme, with the exception of one disabled car parking space.
The Design Manual for Urban Roads and Streets (DMURS) sets out statutory guidance and standards in relation to the design of individual streets and the use of traffic management and placemaking measures to manage traffic and promote safer and more vibrant streets (Section 2.3 refers). The application of DMURS in all new developments will be key to ensure that strategic movements are catered for along desire lines and that all street networks offer route choice and maximise the number of safe and attractive walking and cycle routes between key destinations. The application of DMURS is key to ensure sustainable mobility and the creation of high quality and attractive settlements. Local Authorities should also consider preparing active travel plans or sustainable mobility plans that focus on improving ease of movement in established areas to important destinations such as schools, parks, shops and public transport. This can be of particular benefit where a new transport service or new destination such as a school is proposed	The proposal has been designed in accordance with DMURS.
Mixed and Distribution of Uses These Guidelines promote a move away from segregated land use areas (residential, commercial and employment) that have reinforced unsustainable travel in favour of mixeduse neighbourhoods. Ensuring that there is a good mix and distribution of activities around a hierarchy of centres has many benefits in terms of reducing the need to travel and creating active and vibrant places. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.3 also refers):	Noted. The proposed use is fully in accordance with the Z1 'Sustainable Residential Neighbourhoods' zoning on this site and seeks to provide for intensification of use of a brownfield site by replacing a temporary car park and will provide student accommodation which is wholly compliant with this policy. This site is ideally located next to multiple bus routes and within 900m of Sydney Parade Dart Station. The proposal will replace a temporary car park assisting in the regeneration and revitalisation of

(a) In city and town centres and at high capacity public transport nodes and interchanges (defined in Table 3.8), development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development. (b) In city and town centres, planning authorities should plan for a diverse range of uses including retail, cultural and residential uses and for the adaption and re-use of the existing building stock (e.g. over the shop living). It is also important to plan for the activation of outdoor spaces and the public realm to promote more liveable city and town centres. Much of this can be achieved though the implementation of urban enhancement and traffic demand management measures that work together to free up space for active travel and create spaces that invite people to meet, mingle and dwell within centres. (c) In areas that are less central, the mix of uses should cater for local services and amenities focused around a hierarchy of local centres that support residential communities and with opportunities for suitable non-residential development throughout. (d) In all urban areas, planning authorities should actively promote and support opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under-used lands (including for example the repurposing of car parks at highly accessible urban locations that no longer require a high level of private car access). (e) It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport. (f) The creation of sustainable communities also requires a diverse mix of housing and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can facilitate compact growth and provide greater housing choice that responds to the needs of single people, families,	the existing area, enhancing the appearance of the locality.

older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible. Development plans may specify a mix for apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment.	
Green and Blue Infrastructure Green and Blue Infrastructure (GBI) is a strategically planned network of natural and seminatural areas designed and managed to deliver a wide range of ecosystem services, while also enhancing biodiversity. Ecosystem services include water purification, enhancing air quality, space for recreation and climate mitigation and adaption. In settlements, GBI includes features such as rivers and canals, coastline and coastal habitats, green spaces (including parks), Nature-based Solutions and amenity sites that deliver ecosystem services and contribute to healthy, low carbon, resilient and connected settlements and places. National Planning Objective 58 of the NPF requires integrated planning for Green Infrastructure and ecosystem services as part of the preparation of statutory land use plans. Development plans should include (or be informed by) a Green and Blue Infrastructure Strategy and include objectives for the conservation, restoration and enhancement of natural assets and GBI networks. These objectives can be refined further in local statutory plans and guidance documents in response to local circumstances. The following key principles should be applied in the preparation of local plans and in the preparation and consideration of individual planning applications, (Figure 4.4 also refers): (a) Plan for the protection, restoration and enhancement of natural features, biodiversity and landscapes, and ensure that urban development maintains an appropriate separation and setback from important natural assets. New development should seek to protect and enhance important natural features (habitats and species) within and around the site, should avoid the degradation of ecosystems and include measures to mitigate against any potential negative ecological impacts.	We refer to the Civil Infrastructure Report prepared by TENT Engineering. SuDS measures are included throughout the development as set out in the TENT Engineering reports well as within NMP Landscape Rationale.

(b) Plan for an integrated network of multifunctional and interlinked urban green spaces. This is addressed further in subsection (iii) Public Open Space below. (c) Promote urban greening and Nature-based Solutions (including Sustainable Drainage Systems and slow-the-flow initiatives) for the management of urban surface waters in all new developments and retrofitting in existing areas to ensure that the benefits of ecosystem services are realised. Planning authorities should adopt a nature based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes. (d) The use of Nature-based Solutions at ground level may not be possible on certain brownfield sites due to historic land contamination. In such cases, alternative solutions such as green roofs and walls can be considered.	
Responsive Built Form Built form refers to the layout, position and composition of buildings and to how buildings address streets and open spaces. This is a key element in ensuring the creation of attractive and well-designed settlements. The following key principles should be applied in the preparation of local plans and in the consideration of individual planning applications (Figure 4.5 also refers): (a) New development should support the formation of a legible and coherent urban structure with landmark buildings and features at key nodes and focal points. (b) New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The height, scale and massing of development in particular should respond positively to and enhance the established pattern of development (including streets and spaces). (c) The urban structure of new development should strengthen the overall urban structure and create opportunities for new linkages where possible. (d) Buildings should generally present well-defined edges to streets and public spaces to ensure that the public realm is well-overlooked with active frontages.	Noted. The proposed development, through the use of varied building heights and forms provides clear legibility to the development. The architectural style does not seek to replicate surrounding buildings, due to the varied nature, but has carefully integrated in terms of heights, scale, bulk and materials into the design to compliment the surrounding area. There is an emphasis on creating a fine grain appearance with vertical elevations. This will create a new, attractive urban feature along Merrion Road. The buildings due to their design not only provide a well defined edge to the new spaces, but also ensure that all open spaces are overlooked. This is considered to be an exemplar development showcasing contemporary architecture. A varied, high-quality palette is proposed for the development which creates a distinctive attractive development within the area.

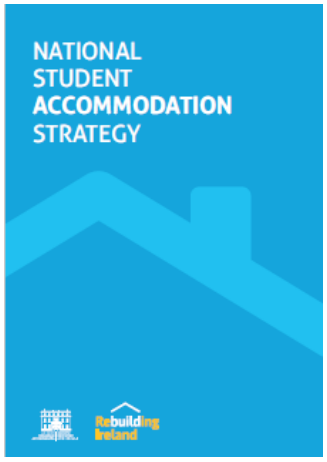
(e) New development should embrace good modern architecture and urban design that is innovative and varied, and respects and enhances local distinctiveness and heritage. (f) Materials and finishes should be of high quality, respond to the local palette of materials and finishes and be highly durable	

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) in relation to the design of housing. The relevant guidelines to this application area:

SPPR 3 – Car Parking	**EVALUATION OF CONSISTENCY**
It is a specific planning policy requirement of these Guidelines that: (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling. Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.	The proposed student accommodation is a car free development, with the exception of 1 no. disabled car parking space. As set out in the TENT engineering reports, this is considered acceptable due to nature of student accommodation, the site's proximity to St. Vincent's Hospital, and the site's proximity to high frequency public transport.
SPPR 4 – Cycle Parking and Storage	**EVALUATION OF CONSISTENCY**
It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure	The proposal provides 206 no. long term bike spaces and 42 no. short term spaces, of which 5% is non standard bike parking equivalent to 12 no. bike

cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended: (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers. (ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.	parking spaces distributed across the site. This is in compliance with DCC's bike parking standards.

NATIONAL STUDENT ACCOMMODATION STRATEGY 2017



The Government launched the first National Student Accommodation Strategy (NSAS) in July 2017. The Strategy is designed to ensure that there is an increased level of supply of purpose-built student accommodation to reduce the demand for accommodation in the private rental sector by both domestic and international students attending Higher Education Institutions (HEIs).

The NSAS notes the targets for purpose-built student accommodation bed spaces up to 2019 and 2024 respectively and is ensured to designed there is an increased supply of student accommodation.

The report states that based on the data available, approximately 18% of full-time students in Ireland are accommodated in purpose-built student accommodation. This figure

is low by international standards with the equivalent figure for the UK published by Higher Education Statistics Agency being c.27%

When combined with the projects that are currently at Pre-Planning phases in the HEIs, the Department of Education and Skills has identified the potential for at least an additional 21,000 PBSA bed spaces places by 2024 over the baseline figure of 33,441 PBSA bed spaces which are currently available. The impact of an additional 21,000 student accommodation bed spaces, in addition to an additional 1,500 Digs spaces, will free up at least an additional 5,000 rental units for the wider residential rental sector. The report states that *"the most effective way to reduce and stabilise rents in the long-term is to increase supply and accelerate delivery of all types of housing. the aim of this strategy is to support the accelerated availability and delivery of student accommodation including both digs and pbsa, which should in turn lead to a stabilisation of the costs of accommodation."*

The NSAS highlights the growing shortage of student accommodation in Dublin *"in Dublin in particular, all HEIs are reporting that their current provision is heavily oversubscribed and students are finding it difficult to secure accommodation on or near their campuses. the des will continue to work with stakeholders to ensure support for the further development of PBSA both by HEIs and private developers."*

EVALUATION OF CONSISTENCY

The proposed development will provide much needed purpose-built student accommodation which will serve Saint Vincents University Hospital. This will support the overall objectives of the National Student Accommodation Strategy of providing student accommodation which will free up the wider residential rental sector. The proposal will also allow for use of the student accommodation outside of term time by tourists and other visitors which is encouraged in the document.

DESIGN MANUAL FOR URBAN ROADS & STREETS (DMURS), 2019

The Design Manual for Urban Roads and Streets (DMURS) was first published in 2013 and has since been updated in May 2019. This document sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

EVALUATION OF CONSISTENCY

The proposed design approach has a single shared surface access route into the site. This provides pedestrian, cycle and vehicular access. There is only one proposed accessible parking space on site. This scheme prioritises pedestrians and cyclists through the development. A DMURS Statement prepared by TENT engineers is included with this submission.

SMARTER TRAVEL – A SUSTAINABLE TRANSPORT FUTURE: A NEW TRANSPORT POLICY FOR IRELAND 2009-2020

Key targets of this national sustainable transport policy include:

- To support sustainable travel, future population and employment growth will have to predominantly take place in sustainable compact urban areas or rural areas, which discourage dispersed development and long commuting

- Work-related commuting by car will be reduced from a current modal share of 65% to 45%, which will mean that between 500,000 and 600,000 commuters will be encouraged to take means of transport other than car driver (of these 200,000 would be existing car drivers). Change in personal behaviour will also be necessary for other travel purposes as most travel relates to non-commuting.
- Car drivers will be accommodated on other modes such as walking, cycling, public transport and car sharing (to the extent that commuting by these modes will rise to 55% by 2020) or through other measures such as e-working.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres.

EVALUATION OF CONSISTENCY

The proposed development is in line with this overall vision for better integration between land-use and transport. The reduced car parking provision of only a single accessible parking space along with the site's proximity to Dublin City centre and to high quality public transport ensure that there will be a modal shift amongst residents in this scheme to try alternative modes of transport and reduce reliance on the private car.

TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2016-2035

The NTA Strategy promotes the consolidation of the Metropolitan Dublin area (where the application is located) allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike. This document identifies under its primary policy, in section 2.2 that "*the Strategy must therefore, promote, within its legislative remit, transport options which provide for unit reductions in carbon emissions.* ***This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available."***

EVALUATION OF CONSISTENCY

This proposed development with its' single accessible car and no other car parking, along with its high level of cycle parking, in combination with its location close to third level educational facilities and is served by several high frequency Dublin Bus routes is in line with the ambitions of this policy. The proposed development, by its promotion of reduce car parking, promotes the use of alternative modes of transport including cycling, walking and public transport.

GUIDELINES FOR PLANNING AUTHORITIES ON THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, 2009

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate

flood risk assessment into the process of making decisions on planning applications and planning appeals.

EVALUATION OF CONSISTENCY
A Site-Specific Flood Risk Assessment has been carried out by TENT Consulting Engineers.

Our site is Flood Zone C. The proposed development site is therefore deemed appropriate development in this location. The justification test is not needed. The proposed site level remains similar compared to the existing site level and no additional flood defence measures are necessary. Surface water on site will be adequately dealt with as per the proposed Civil infrastructure report and drawings, that form part of this planning application. The proposed on-site impermeable areas are actively drained and discharge to a combined sewer.

TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2022-2042

The Transport Strategy for the Greater Dublin Area 2022-2042 is compiled by the National Transport Authority (NTA). It sets out an integrated long-term strategy for the area, including new public transport proposals such as expansions to DART, Luas services and Metro routes. The overall aim is *"To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports economic growth."*

The Transport Strategy includes measures that are considered to be essential in meeting the high-level objectives of fostering sustainable development and fully integrating land use planning and transport planning, including:

- Consolidation of development, to ensure more people live close to services and public transport, and to minimise urban sprawl and long distance commuting;
- Transit-oriented development to guide the growth of our cities and towns on the basis of accessibility;
- Mixed use development, to minimise travel distances between homes and local services, and to ensure vibrancy of urban areas;
- Filtered permeability so that people can move about more easily by walking and cycling than by car.

EVALUATION OF CONSISTENCY
The proposed development aligns with objectives of the Transport Strategy by promoting a high-quality student accommodation development at an accessible location which benefits from existing and proposed connectivity through an inclusive transport system.

The site is located on an existing high quality bus corridor with multiple bus services running in this location. It is also a proposed Bus Connects Spine Route with a bus stop located directly outside the site.

The site is also close to the DART Sydney Parade Station which also provides excellent public transport options. The proposed development will minimise the travel distance to SVUH for the future students who will be resident here which will enable easy walking and cycling distances.
This is set out in the Transport Assessment prepared by TENT Engineering.

Development Plan Context 2022-2028

The site is zoned as *'Sustainable Residential Neighbourhoods – Zone Z1'* with the objective *"To protect, provide and improve residential amenities."*

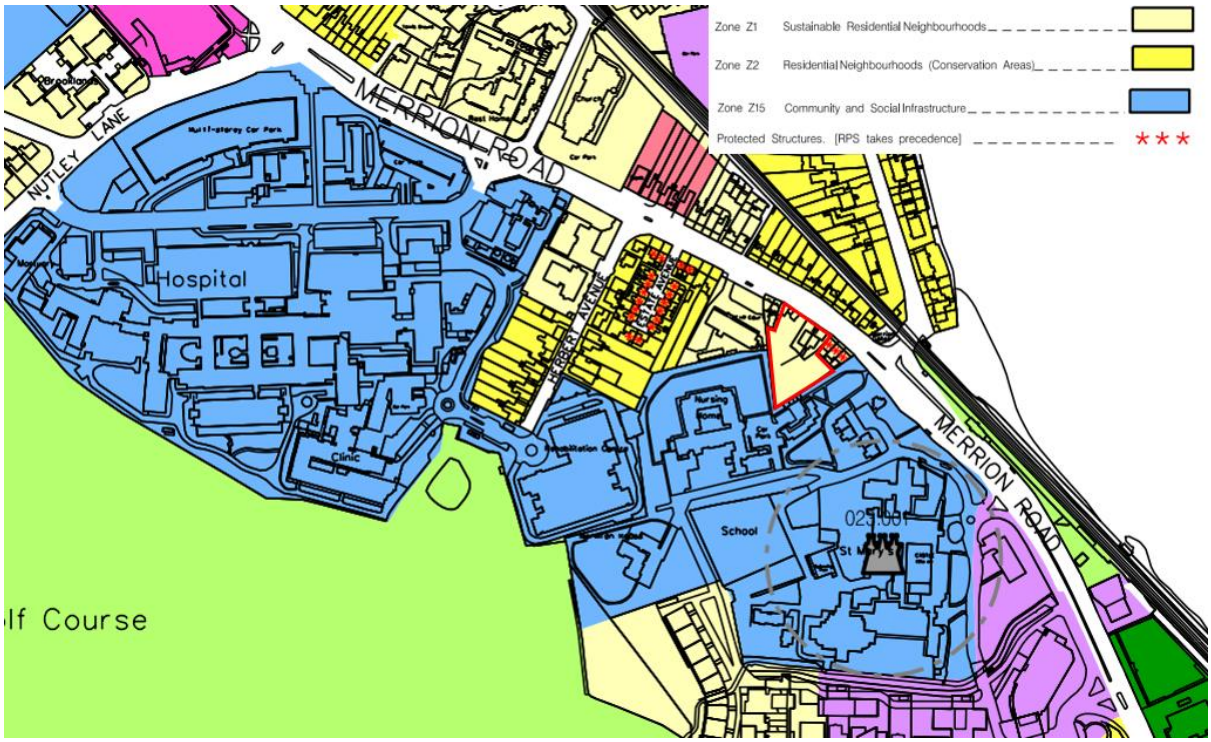


Figure 19: Map H of the Dublin City Council Development Plan 2022-2028

The proposed development is for student accommodation which is 'open for consideration' on this site zoned Z1 under the current development plan.

According to the 2022 City Plan: "*An open for consideration use is one which may be permitted where the planning authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects on the permitted uses, and would otherwise be consistent with the proper planning and sustainable development of the area."*

Z1 – Permissible Uses
Assisted living/retirement home, buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, delicatessen, education, embassy residential, enterprise centre, halting site, home-based economic activity, medical and related consultants, open space, place of public worship, public service installation, residential, shop (local), sports facility and recreational uses, training centre.
Z1 – Open for Consideration Uses
Allotments, beauty/ grooming services, bed and breakfast, betting office, Build to Rent residential, café/tearoom, car park, civic and amenity/recycling centre, garden centre/plant nursery, guesthouse, hostel (tourist), hotel, industry (light), laundromat, live/work units, media-associated uses, mobility hub, off-licence, off-licence (part), office, park and ride facility, petrol station, pigeon loft, postal hotel/motel, primary health care centre, public house, residential institution, restaurant, **student accommodation**, veterinary surgery.

EVALUATION OF CONSISTENCY

The proposed development will add positively to the mix of land uses within the immediate vicinity which includes residential and medical uses within the immediate area, while in the wider area there are commercial, offices, retail and restaurant uses.

The submitted application is accompanied by a letter of support received from SVUH which is a third level teaching hospital. It is also close to UCD and Trinity college. The proposals are in accordance with national, regional and local planning policy and guidelines as well as the National Student Accommodation Strategy which seeks the enhanced provision of professionally managed student accommodation schemes at accessible locations proximate to third level institutions, services and facilities.

The proposals will introduce 200 no. student bedspaces which will reduce pressures on the existing housing stock in the area and provide appropriate student accommodation close to third level institutions such as SVUH, reducing travel time for students and enabling them to choose more sustainable modes of transport to get to university.

This is aligned with NPF (and revised draft) as well as the Government's Housing for All Plan which seeks to deliver an increased quantum of student accommodation in appropriate locations to meet an identified need and reduce pressure on existing housing stock.

The proposed PBSA will contribute to achieving the Z1 zoning objective and the creation of sustainable residential communities providing a high-quality and professionally managed scheme within convenient distance of third level institutions.

Owing to the separation distances to adjacent residential properties to the north, west, and east of the proposed development will also preserve existing residential amenity.

The site benefits from high quality and frequency public transport, which will be further enhanced by the proposed BusConnects Core Corridor linking the site to Dublin city centre. There are also excellent pedestrian and cycle infrastructure within the vicinity of the site which again will be further improved as a result of Bus Connects In addition, the proposed development will sustain public transport through higher density development while also supporting local services and activities within the Merrion area.

The redevelopment of the under-utilised brownfield site on a key public transportation corridor is supported by the NPF and the City Plan. The design of the proposed development in terms of its height and form has had regard to permitted developments on site, the existing urban form in the vicinity and has considered the presence of the protected structure adjacent to the property.

Overall it is submitted that the proposed PBSA is in accordance with the zoning objective to ensure high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services.

Chapter 5 *'Quality Housing and Sustainable Neighbourhoods'* of the Development Plan sets out specific policies/objectives in relation to student accommodation. See the following table outlining these policies/objectives and how the proposed development is in line with these policies/objectives.

Chapter 5 also highlights that *"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*." The City Plan further notes that the "*geographical spread shows the clustering of the facilities within 1km of the larger third level institutions within the city, allowing most residents to easily walk to their place of education.*"

The Student Demand & Concentration Assessment above Report demonstrates a low provision of existing student bedspaces within 1km of the site with no purpose built student accommodation within 1km of the site. Therefore, the area is considered suitable for additional high quality purpose built student accommodation.

Policy/Objective	Statement of Consistency
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.	The proposed development will be 'purpose built student accommodation' for St. Vincents Hospital. St. Vincent's University Hospital have confirmed their support letter in relation to student accommodation in the Merrion area. Please refer to the letter submitted as part of this application. St.Vincent's University Hospital (SVUH) is one of the world's leading academic teaching hospitals providing front line, acute, chronic and emergency care across over 50 different medical specialities – in the country's only integrated multi-hospital campus. As such it is in need, as a multi-disciplinary teaching and research hospital for accommodation for its students and staff. Therefore, this proposed development which is c. 250m or less than 5 minutes walk away. This site is ideally situated to support SVUH in its vital education and research role. It is also noted that Caritas, a post operative nursing and care home, is located to the south and west of the site. As requested under section 15.13.1 of the Development Plan, a map illustrating existing, proposed and under construction student accommodation development within a 1km distance of the proposal will be submitted as part of a full planning application. However, our research indicates that the Merrion area does not have any existing, proposed or under construction student accommodation within 1km of the site.

	There is only 1 student accommodation facility which is just over c.1.1km away at 'Aparto Montrose', Stillorgan Road, Dublin. This is provided to accommodates UCD students. An Bord Pleanála granted permission for 105 bedspaces on the 29th of June 2023 along Woodbine Road, Booterstown which is c.1km southwest of the Merrion area. It is envisaged that this accommodation will address UCD's under provision of student accommodation.
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.	The proposed development is in line with the Guidelines for Student Accommodation. The development is purpose-built student accommodation for medical students/professionals attending St. Vincent's Hospital which is located c. 250m from the subject site. The site is on a high quality bus corridor with stops immediately outside the site. It is also within a c. 10 minute walk of the DART. The site layout is similar to that already permitted on the site, albeit a slightly reduced height and altered design. Therefore in terms of relationship with the surrounding buildings in terms of overlooking, privacy, shadowing it is considered that the proposed development will result in improvements to the neighbouring amenity. The development will be retained as student accommodation during term time.

Chapter 15 of the Development Plan 'Development Standards' outlines standards for residential typologies including student accommodation.

Policy	Evaluation of Consistency
15.3 Environmental Assessment - EIA/AA/Ecological Impact Assessment	
15.3.1 Environmental Impact Assessment Environmental Impact Assessments (EIA) consider whether development projects either alone or in combination are likely to have significant effects on the environment.	The proposed development is below the thresholds of Schedule 5 of the Planning and Development Regulations.
15.3.2 Appropriate Assessment Appropriate Assessment (AA) under Article 6 of the Habitats Directive considers whether or not a proposed plan or project would adversely affect the integrity of a European Site.	Please refer to AA Screening prepared by Altemar.

15.3.3 Ecological Impact Assessment 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.	Please refer to the AA Screening prepared by Altemar. An EcIA was prepared on the previous application and due to the site being cleared, an updated EcIA is not required. A Biodiversity Enhancement Plan has been prepared and is submitted as part of this application.
15.4 Key Design Principles	
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	The proposed development is located in close proximity to a high-quality Dublin Bus public transport corridor and DART station. The proposed student accommodation is located well located in terms of social infrastructure with Merrion shopping centre located c.500m from the site. The provision of cycle parking within the scheme promotes a modal shift to active travel methods such as walking and cycling.
15.4.2 Architectural Design Quality 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.	The materials used are high quality and will ensure the design of the scheme contributes positively towards the townscape and urban realm.
15.4.3 Sustainability and Climate Action 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.	Please refer to the Climate Action Energy Statement prepared by TENT Engineering. We also refer you to the Operational Waste Management Plan which set out the approach to waste management once the site is operational.
15.4.4 Inclusivity and Accessibility Development proposals, including all new large scale developments…… 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.	The proposed development is designed to be accessible to all.
15.4.5 Safe and Secure Design 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).	The scheme is designed to ensure residents and visitors are interacting with a safe and secure environment. Communal areas are designed so that active passive surveillance is in operation
15.5.4 Height	Please refer to the height strategy assessment located within the MDOs design statement.

Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.	Please also refer to the assessment above against the Building Height Guidelines 2019.
15.5.5 Density New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood.	It should be noted that the Development Plan does not specify density ranges for Student Accommodation which is identified as a standalone use class in the Development Plan. Appendix 3 of the CDP relate solely to residential use applicable to housing and apartments. It is noted in an outer suburban site such as this a density range of 60 – 120 uph would be considered appropriate for a residential apartment development. The proposed development is achieving a density of 177 uph. This density is in line with the previously permitted development on site, the existing site conditions, the need for compact growth and the policies of a 15 minute city. This density makes best use of this scarce resource – land. As discussed above, due to the site's Urban Neighbourhood location and its location within a 'High Capacity Public Transport Node or Interchange' as defined in the Compact Settlement Guidelines, increased densities are considered appropriate. The proposed development has a density of c. 177 units per hectare, based on the Compact Settlement Guidelines provision of 4 PBSA bedspaces equalling 1 residential unit. It is important to note that while the proposed density is at the higher end, the building heights are entirely consistent with the previously permitted development on this site and the more recent developments in the area which have raised the prevailing building heights in the area. The proposed development is considered to demonstrate a high-quality architectural and urban design rationale having regard to the regeneration of the site through the replacement with a high quality element of modern architecture and design. The setbacks, modulated massing and combination of glazing and materials contribute to a positive aesthetic which sits

<table>
<tr><td></td><td>quietly alongside the protected structure and vastly improves the setting of this compared with the existing condition of the site.

The proposal incorporates an active frontage along Merrion Road while enhancing activity and passive surveillance at the location. The proposed development has been assessed by Molloy Associates as part of the AHIA and it has been found acceptable.</td></tr>
<tr><td>15.5.6 Plot Ratio and Site Coverage
Appendix 3, Table 2 provides indicative plot ratio and site coverage standards.
<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></td><td>Plot ratio is 0.5:1

Site coverage is 49%</td></tr>
<tr><td>15.5.7 Materials and Finishes
All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application.</td><td>Please see the Architecture Design Statement for further information.</td></tr>
<tr><td>15.5.8 Architectural Design Statements
Table 15-2: Information Requirements for Design Statements
<table><tr><th>Residential Developments</th></tr><tr><td>Site Location and Description</td></tr><tr><td>Context and Setting</td></tr><tr><td>Urban Design Rationale</td></tr><tr><td>Design Evolution / Alternatives Considered</td></tr><tr><td>Block Layout and Design</td></tr><tr><td>Site Connectivity and Permeability</td></tr><tr><td>Height, Scale and Massing</td></tr><tr><td>Materials and Finishes</td></tr><tr><td>Open Space (Private, Communal, Public)</td></tr><tr><td>Public Realm Contribution</td></tr><tr><td>Compliance with Internal Design Standards</td></tr><tr><td>Daylight and Sunlight</td></tr><tr><td>Overlooking, Overbearing, Overshadowing</td></tr><tr><td>Car and Cycle Parking</td></tr><tr><td>Management/Lifecycle Report</td></tr><tr><td>Compliance with DMURS</td></tr><tr><td>Safety and Security</td></tr><tr><td>Universal Access</td></tr></table></td><td>MDO Architects have prepared an Architectural Design Statement which analyses the context and constraints of the site and includes a detailed design of the development. The Design Statement provides all of this information listed in this section.</td></tr>
<tr><td>15.5.9 Models and Photomontages</td><td>3DDesign Bureau have completed the verified views and CGI’s for the site. These provide a realistic view of what the development will look like once it is completed.</td></tr>
<tr><td colspan="2">15.6 Green Infrastructure and Landscaping</td></tr>
<tr><td>15.6.2 Surface Water Management and SuDs
All new developments will be required to prepare a Surface Water Management Plan in accordance</td><td>The surface water strategy within the Civil Engineering Planning Report prepared by TENT has been updated to include the</td></tr>
</table>

with the requirements of the Council's Surface Water Management Guidance	provision of green roofs, blue roofs and various other sustainable measures.
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.	
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	Please refer to the landscape architecture pack prepared by NMP Landscape Architects.
15.6.7 Landscape Design Rationale 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	NMP Landscape Architects have prepared a Landscape Report as part of this planning application. The report provides details on the following items: landscape proposals, boundary details, planting schedule etc. Please see the Landscape Report for more detailed information.
15.6.8 Landscape Plans and Design Reports 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.	
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.	MDO Architecture and NMP Landscape Architecture documentation provide detailed design of boundary treatments. Please also refer to the AHIA by Molloy & Associates for details regarding the wall boundary.
15.7 Climate Action	
15.7.2 District Heating	A Climate Energy Statement has been prepared by TENT Engineering. Please refer to this document for information on Building Regulations Compliance and DEAP Methodology and Analysis.
15.7.3 Climate Action and Energy Statement 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.	
15.8 Residential Development	
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	The proposed development has had regard to the guidance listed within section 15.8.1. These are discussed in detail above under the National Planning guidance section.

'Urban Design Manual (2010)', Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads and Streets (2019) and Design Manual for Quality Housing (2022).	
15.8.2 Community and Social Audit 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.	Please refer to the Social Infrastructure Audit contained within this report. As this is a student accommodation proposal, it will not generate demand for school or creche places.
15.8.3 Schools 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.	
Section 15.8.6 Public Open Space **"***All residential development is required to provide for public open space"*	The Development Plan does not set any requirement for Public Open Space provision for Student accommodation. This has consistently been the approach in Dublin City Council with regard to permitted PBSA. Furthermore, the Development Plan distinguishes 'Student Accommodation' from 'Residential' in terms of the Land Use Definitions set out in Appendix 15 of the plan (as well as throughout the Plan and Land Use Zoning at Chapter 14) and noted as follows: *"Residential: The use for human habitation of a building, or part thereof, including houses, apartments, studios and residential mews buildings. The definition of house and habitable house in Section 2 of the Planning and Development Act 2000 (as amended) shall apply.* *Student Accommodation: A building or part thereof used or to be used to accommodate students whether or not provided by a relevant provider (within the meaning of Qualifications and Quality Assurance (Education and Training) Act 2012), and that is not for use (i) as permanent residential accommodation, or (ii) subject to (b), as a hotel, hostel, apart-hotel or similar type accommodation, and (b) includes residential accommodation that is*

	used as tourist or visitor accommodation but only if it is so used outside of academic term times (see also Planning and Development (Housing) and Residential Tenancies Act 2016)." In line with this approach no public open space is provided on site, however, ample communal internal and external amenity space is provided accommodating a range of student facilities. In addition, the site has the benefit of good links to existing public open space including the sea front.
15.8.11 Management Companies/Taking in Charge	The proposed development will not be taken in charge.
15.15 Built Heritage and Archaeology	
15.15.1.3 Best Practice The development shall be carried out in accordance with the documents listed in this section of the development plan.	The proposed development is in accordance with documents listed.
15.15.1.4 Basements New basement development in the medieval core and known medieval sites shall be avoided. Approved basements may be rescinded where undue damage to in situ archaeological deposits will occur as a result.	TENT Engineering have prepared a Basement Impact Assessment which is submitted a spart of this application.
15.18 Environmental Management	
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	TENT Engineering have prepared an outline Construction Management Plan submitted as part of this pre planning application. This includes advise on Construction Traffic Management and will be finalised following the grant of a permission. The construction management plan includes a Traffic Management Plan which will be finalised as part of the final submission.
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.	A phasing plan is not required for this proposed development as it is proposed to complete this development within a single phase.
15.18.1.2 Considered Construction Considered Construction seeks to improve the image of the construction industry which requires registered contractors to commit to care about appearance, respect the community, protect the	

environment, secure everyone's safety and value their workforce.	
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.	
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.	Section 14 of the Construction Management Plan states the following: *"Construction work will take place during normal working hours as follows:* • *Monday to Friday 07.00 – 18.00* • *Saturday 08.00 – 14.00"* The design team welcome a condition by the council to alter hours of operation if necessary.
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.	TENT Engineering prepared an Operational Waste Management Plan submitted as part of this application.
15.18.4 Basements It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is considered as being an accessible area positioned below the existing street level or ground level and would include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.	TENT Consulting Engineers prepared a Basement Impact Assessment for the proposed development.
15.18.9 Noise 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.	Please refer to the Outline Construction Management Plan prepared by TENT Engineering which contains information regarding Noise mitigation measures.
15.18.10 Air Quality All developments during construction and operational stage shall ensure that the air quality	Please refer to the Outline Construction Management Plan prepared by TENT Engineering which contains information

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.	regarding Air Quality during construction and Operation stage. Please refer to the EIA Screening Report prepared by MCG Planning.
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.	A ground investigations report will be included in the final planning application.
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	Please refer to the SSFRA prepared by TENT consulting engineers.
Policy/Objective	**Statement of Consistency**
15.13.1 Student Accommodation 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 security arrangements, should be designed to avoid isolating developments from the surrounding community.	The proposed development is of high-quality architecture and respects the surrounding area and adjacent buildings. The architectural style does not seek to replicate surrounding buildings, due to the varied nature, but has carefully integrated in terms of heights, scale, bulk and materials into the design to compliment the surrounding area. There is an emphasis on creating a fine grain appearance with vertical elevations.
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.	Please refer to the above section in this planning report which deals with student accommodation justification. This confirms that there is not an over concentration of such schemes in any one area.
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 a planning permission for a change of use to other types of residential accommodation.	The application is accompanied by an 'Operational Management Plan' prepared by Global Apartment Advisors. The report provides an overview of the long-term outline management strategy and the operational processes and policies that will be put in place in order to ensure the effective administration and supervision of the proposed student accommodation residence.

<table>
<tr><td>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.</td><td>Please refer to the Student Accommodation Justification Section of this report which confirms that the proposal will not result in an excessive concentration of student accommodation in the locality.</td></tr>
<tr><td>15.13.1.1 Unit Mix
Student accommodation is typically provided on a ‘cluster’ type model comprising of a group of bedrooms and a shared kitchen / living/ dining space. A minimum of 3 bed spaces with an overall minimum gross floor area of 55 sq. m. up to a maximum of 8 bed spaces and a maximum gross floor area of 160 sq. m. shall be provided in any ‘cluster’ of student accommodation units.

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.</td><td>The proposed development is in line with these standards. A cluster type model is used within this development.

Please refer to the Housing Quality Assessment prepared by McCauley Daye O’ Connell Architect’s which sets out room sizes and confirms compliance with these requirements.</td></tr>
<tr><td>Table 15-7 Minimum Bedroom Sizes for Student Accommodation Clusters
<table><tr><th>Bedroom Type</th><th>Bedroom Size</th><th>Bedroom Size including en-suite</th></tr><tr><td>Single Study</td><td>8 sqm</td><td>12 sqm</td></tr><tr><td>Twin Study</td><td>15 sqm</td><td>18 sqm</td></tr><tr><td>Disabled Study</td><td>-</td><td>15 sqm</td></tr></table></td><td>This is achieved.

Please refer to Housing Quality Assessment prepared by McCauley Daye O’ Connell Architect’s submitted as part of this application.</td></tr>
<tr><td>Section 15.13.1.3 outlines that communal facilities and services which serve the needs of students shall be provided both internally and externally within a scheme. The plan states that these can be broken down into 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.” internally with ground floor</td><td>This is achieved.

Communal facilities and services which serve the needs of students are provided both internally and externally within the scheme.

A ground floor landscaped courtyard which includes a basketball practice hoop and an external gym that achieves appropriate</td></tr>
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<table>
<tr>
<td>courtyards, terraces and roof gardens to be provided externally

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 sqm per bedspace</td></tr>
<tr><td>Kitchen/Living/Dining</td><td>4 sqm per bedspace</td></tr>
<tr><td>Total</td><td>9-13 sqm per bedspace</td></tr>
</table>
</td>
<td>daylighting and sun lighting is being proposed on site, providing a total of 820 sqm external communal space

A communal indoor space at ground and basement level is proposed to include reception area, lobby, parcel and laundry room, student residents' lounge, co-working space, multi-purpose gym/studio, providing a total of 412.88 internal communal space.

In total, the scheme provides 1232.88 communal space for students resulting in 6.2sqm of amenity space per bedspace.</td>
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<tr>
<td>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 at surface level at a rate of 1 per 10 no. residents – refer to Appendix 5 for further details.</td>
<td>The proposed development includes a communal bike store adjacent to Block B addressing the minimum standards highlighted under section 15.13.1.4 of the development plan.

Given its location no car parking is proposed for this development, except for one disability use car parking space. It is noted however that there is a GoCar base within Elmpark Green, c. 200m to the south of the site.

Due to the nature of student accommodation, one pick up / drop off space is also allocated in the scheme.

A TTA and a Mobility Travel Plan has been submitted setting out the highly accessible nature of the site with any future planning application.</td>
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<tr>
<td>Section 15.13.1.2 states 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."</td>
<td>We refer to the Daylight / Sunlight Assessment prepared by ARUP which details the results of their assessment of the proposed individual rooms and units of the scheme in terms of daylight / sunlight exposure and how the development complies with the daylight / sunlight requirements set out in Appendix 16 of the plan.</td>
</tr>
</table>

Appendix 3 Table 3: Performance Criteria in Assessing Proposal for Enhanced Height, Density and Scale	
Objective 1: To promote development with a sense of place and character Enhanced density and scale should:	The text, diagrams and illustrations in Architects Design Statement prepared by MDO and also in the supporting information submitted with this application for planning

• respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints, • have a positive impact on the local community and environment and contribute to 'healthy placemaking', • create a distinctive design and add to and enhance the quality design of the area, • be appropriately located in highly accessible places of greater activity and land use intensity, • have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, • not be monolithic and should have a well considered design response that avoids long slab blocks, • ensure that set back floors are appropriately scaled and designed.	permission, aim to demonstrate compliance with this objective. The blocks have been carefully designed and located to minimise any negative impact on the adjacent residential properties. The blocks have been stepped back minimise overlooking and the impact on daylight and sunlight. The massing of Block A (front block) is broken down following traditional townhouse rhythm. The T shape form of the building also presents much narrower elegant gables to Merrion Road. Block B (rear block) height is setback further from the street and protected structures, creating a larger setback gardens of the protected buildings. Block B also follows the townhouse rhythm like Block A.
Objective 2: To provide appropriate legibility Enhanced density and scale should: • make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability.	The proposed development will provide a strong frontage to the Merrion Road which help create a sense of enclosure and place for pedestrians walking along this road.
Objective 3: To provide appropriate continuity and enclosure of streets and spaces Enhanced density and scale should: • enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3, • provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.	The proposed development will provide a strong frontage to Merrion Road which will provide a good sense of enclosure to the proposed public open space. The routes through the site will all be overlooked by the proposed student accommodation. This will ensure adequate passive surveillance is provided to the public realm. The heights and streets provide an appropriate street width to building height ratio at a human scale.
Objective 4: To provide well connected, high quality and active public and communal spaces Enhanced density and scale should: • integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, • be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards,	The proposed development will provide a high-quality design that will integrate into and enhance the site. The design prioritises pedestrians, cyclists and public transport within this car free development. The blocks have been carefully located to ensure appropriate distance is provided

• ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16, • ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development, • ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated, • provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.	between the proposal and the existing adjacent properties. The daylight sunlight assessment demonstrates that the proposed accommodation and open spaces all achieve appropriate levels of daylight. The wind microclimate study demonstrates that there will not be a negative wind impact resulting from the proposed development. The spaces and streets have all been designed to be people friendly and accessible.
Objective 5: To provide high quality, attractive and useable private spaces Enhanced density and scale should: • not compromise the provision of high quality private outdoor space, • ensure that private space is usable, safe, accessible and inviting, • ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16, • assess the microclimatic effects to mitigate and avoid negative impacts, • retain reasonable levels of overlooking and privacy in residential and mixed use development.	There is a high quality of public, communal and private open spaces provided. All of these spaces are safe, accessible, and inviting. The daylight sunlight assessment demonstrates that the proposed accommodation and open spaces all achieve appropriate levels of daylight. The wind microclimate study demonstrates that there will not be a negative wind impact resulting from the proposed development. The proposal has been designed to ensure passive surveillance is provided to the communal spaces while also ensuring a high level of privacy is maintained for the bedspaces.
Objective 6: To promote mix of use and diversity of activities Enhanced density and scale should: • promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure, • contribute positively to the formation of a 'sustainable urban neighbourhood', • include a mix of building and dwelling typologies in the neighbourhood, • provide for residential development, with a range of housing typologies suited to different stages of the life cycle.	The subject site is located within a short walking distance of a range of amenities such as retail, restaurants, public houses and employment hubs. Therefore, it was not considered appropriate to provide mixed uses on the subject site. The proposed development will provide student accommodation in this existing suburb which will support the range of facilities and amenities in the area and provide housing for people to live. The proposed PBSA will improve the housing supply quality in the area and will address the

	critical student accommodation shortage in the area for those studying at SVUH.
Objective 7: To ensure high quality and environmentally sustainable buildings Enhanced density and scale should: • be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16, • not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain, • ensure a degree of physical building adaptability as well as internal flexibility in design and layout, • ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive, • maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage, • be constructed of the highest quality materials and robust construction methodologies, • incorporate appropriate sustainable technologies, be energy efficient and climate resilient, • apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16), • incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based S UDS solutions are in place – see Appendix 13, • include a flood risk assessment - see SFRA Volume 7. • include an assessment of embodied energy impacts – see Section 15.7.1	The Architectural drawings and schedules, the Architectural Design Statement and the reports provided by other Design Team consultants cover aspects of the design such as sunlight and daylight, overshadowing, micro-climate and wind impact,building materials, energy efficiency, use of sustainable technologies, surface water management, flood risk and assessment of embodied energy impacts.
Objective 8: To secure sustainable density, intensity at locations of high accessibility Enhanced density and scale should: • be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport, • look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.	The subject site is well connected to the wider area with high quality, high frequency bus routes serving Merrion Road. The subject site is also c.8 minutes from Sydney Parade Dart Station. The layout has been designed to provide the optimum layout for access while providing a high-quality scheme that prioritises pedestrians and creates a human scaled place.

Objective 9: To protect historic environments from insensitive development Enhanced density and scale should: • not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below. • be accompanied by a detailed assessment to establish the sensitives of the existing environment and its capacity to absorb the extent of development proposed, • assess potential impacts on keys views and vistas related to the historic environment.	The site is not located within an Architectural Conservation Area and does not contain any Protected Structure or National Monument. Whilst the northern boundary aligned with Merrion Road has been removed, historic granite walled boundaries exist in various forms to the north and west of the site. A lower wall of similar composition has been extended with mass concrete to the southwestern boundary. Three protected structures at Nos 179 Merrion Road (RPS reference 5092), 181 Merrion Road (RPS reference 5093) and 183 Merrion Road (RPS reference 5094) share boundaries to the east of the development site. A semi-detached pair of houses, not included on the RPS but of general heritage interest, Nos 165 and 167 Merrion Road, abound the northwest of the site. The Architectural Heritage Impact Assessment prepared by Molloy & Associates confirms that *"The proposed development, addressing a busy road, seeks to construct an infill building of scale between two lower scaled, established, building groups of heritage interest. Its modulated form introduces flexibility at boundaries shared with both groups, enabling it to better integrate with what is an inconsistent, but acceptably diverse streetscape, reflecting both the rhythm of extant fenestration and pitched roof typologies dominant in the vicinity. The resulting scheme in its dynamic interpretation of common local characteristics, blends successfully with its environs and introduces an enrichment that does not dominate either the setting or character of buildings of heritage interest adjacent".* As shown in the Architects Design Statement and the photomontages, the site and its surrounding environment has the capacity to absorb the proposed development.

Objective 10: To ensure appropriate management and maintenance Enhanced density and scale should • Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc	A Building Life Cycle Report is provided within the Architect's Design Statement that sets out the management strategy for the scheme post construction in order to demonstrate how once operational, the mechanics of the property management and public realm maintenance will work in practice and be maintained to the highest standards.

CONCLUSION

The proposed development will enable the development of this site delivering much needed student accommodation in a desirable area which is serviced by excellent public transport, services and social infrastructure and close to educational facilities. Having regard to the zoning of the site the proposed development is open for consideration under the City Development Plan 2022-2028.

The proposed development is in line with the currently adopted National Guidance, in the form of the NPF, along with National Guidance (Urban Development and Building Heights) which require Local Authorities and developers to maximise the use of development sites within cities in order to achieve the goal of a more compact city. As a result, high densities, along with higher buildings, can be acceptable if it is designed to a high-quality standard. National guidance advises against the use of quantitative standards as a catch-all for development and advises the use of qualitative standards when assessing new applications.

The proposal maintains a very high-quality architectural design with high quality materials and which balances the delicate context of the single storey protected structures located to the east against the more modern developments to the south and the untapped potential of the site to the south. This is a transitionary site and as such the design of the scheme marries the single storey element to the east to the more modern development occurring around the site. This is considered a successful, and appropriate development for this difficult, small, infill site.

The height, scale, form, and density of development is appropriate having regard to the high demand for PBSA and excellent access to public transport. It is also similar in scale, height and design to the permitted developments DCC Reg. Ref. 4477/19 and 4051/21.

The rationale for proposing student accommodation at this location is to address the under provision of accommodation for nursing/medical students attending St. Vincents Hospital which is located c. 250m west of this site. It is noted that there is a well report severe shortage of student accommodation across Dublin City and suburbs. This is reflected in the surveys carried out by the CSO and Trinity College Dublin which indicated increased travel times and distances for students and staff within the Dublin area. This has the knock-on impact on their quality of life as well as reduced numbers of people walking or cycling to third level education.

This site is ideally located, close to St Vincent's University Hospital as well as UCD and TCD all of which can be accessed readily be foot, bike or public transport. It will enable a work life balance for students, providing ease of access to the third level institution they will be studying/ working in. Furthermore, given the proximity to SVUH and the acknowledged anti-social hours nursing and medical students work, being able to get to and from this destination is less than 10 minutes by foot is invaluable.

Section 15.13.1 of the development plan states that *"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."* The proposed student accommodation will address the under provision of accommodation available to students attending St. Vincents University Hospital.

Dublin City Development Plan references *'Purpose-built student accommodation (PBSA)'*, the proposed development would contribute towards the identified target of PBSA for Dublin City. In relation to PBSA targets the development plan states that *"The National Student Accommodation Strategy, published in May 2017, identified the key target of the construction of at least an additional*

16,374 PBSA bed spaces to provide an overall supply of 28,806 PBSA bed spaces in the Dublin area by 2024." The proposed development will offer 200 bedspaces to students attending St. Vincents Hospital which will increase Dublin's *"relatively low proportion of students accommodated in PBSA, with approximately 16% of the student population accommodated in PBSA in 2018, compared to approximately 38% in Edinburgh."*

The site is in a highly accessible location and area for students to interact with the city centre as well as attending St. Vincents Hospital for educational purposes. The proposed development has been designed to integrate in with the existing street layout and takes into account the surrounding built up area. It is respectfully suggested that this proposal is fully in accordance with the Dublin City Development Plan.

Yours Sincerely,

Cait Marley

Letter of Support from St Vincents' University Hospital

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Mr John Maxwell
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Lioncor
1st Floor Block E, Iveagh Court
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Dublin 2
D02 YT22

Via Email

6th June 2024

Re: Student Nurse and Medical Accommodation.

Dear Mr Maxwell,

In response to your communication regarding the potential for accommodation on the Merrion Road, St. Vincent's Healthcare Group (SVHG) would welcome affordable accommodation development in the Merrion area, particularly if it could facilitate Medical students and student Nurses and Health and Social Care Professionals undertaking their placements within the hospital.

If such accommodation was available it would also be very helpful in the recruitment of healthcare workers here in SVHG (St. Vincent's University Hospital, St. Vincent's Private Hospital and St. Michael's Hospital).

SVHG, without prejudice, would be willing to confirm its' support for this proposed development.

Yours sincerely,

Michael Keane

Professor Michael Keane,
Interim Chief Executive Officer.