THORNTON O'CONNOR
TOWN PLANNING

Planning Report & Statement of Consistency

Prepared in Respect of a Planning Application for a Large-Scale Residential Development Primarily Comprising Student Accommodation at Nos. 87-93 Middle Abbey Street, Dublin 1, D01 NH70 (known collectively as 'Independent House')

On Behalf of Summix IHD Developments Limited

April 2025

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NO. 1 KILMACUD ROAD UPPER, DUNDRUM, DUBLIN 14, D14 EA89
+353.1.205.1490 INFO@TOCTOWNPLANNING.IE
WWW.TOCTOWNPLANNING.IE

THORNTON O'CONNOR
TOWN PLANNING

Planning Department
Dublin City Council
Civic Offices
Wood Quay
Dublin 8
D08 RF3F

Friday, 25th April 2025

Dear Sir/ Madam

Re: LARGE-SCALE RESIDENTIAL DEVELOPMENT APPLICATION FOR PERMISSION FOR STUDENT ACCOMMODATION, RETAIL, CAFÉ/RESTAURANT & CULTURAL/COMMUNITY FLOOR SPACE AT NOS. 87-93 MIDDLE ABBEY STREET, DUBLIN 1, D01 NH70 (KNOWN COLLECTIVELY AS 'INDEPENDENT HOUSE').

1.0 INTRODUCTION

1.1 Application for Development

Thornton O'Connor Town Planning[1] in association with a Multi-Disciplinary Team, as detailed in the table in Section 1.3 below, have been retained by Summix IHD Developments Limited[2] to prepare this Large-Scale Residential Development ('LRD') Planning Application for the provision of Student Accommodation and retail, café/restaurant and cultural/community floor space at Nos. 87-93 Middle Abbey Street, Dublin 1, D01 NH70 (known collectively as 'Independent House').

Figure 1.1 overleaf provides a street view image of the subject site along Middle Abbey Street.

[1] No. 1 Kilmacud Road Upper, Dundrum, Dublin 14
[2] One Spencer Dock, North Wall Quay, Dublin 1, Dublin, Ireland

THORNTON O'CONNOR TOWN PLANNING LTD REGISTERED IN IRELAND NO. 583144 DIRECTORS: PATRICIA THORNTON, SADHBH O'CONNOR

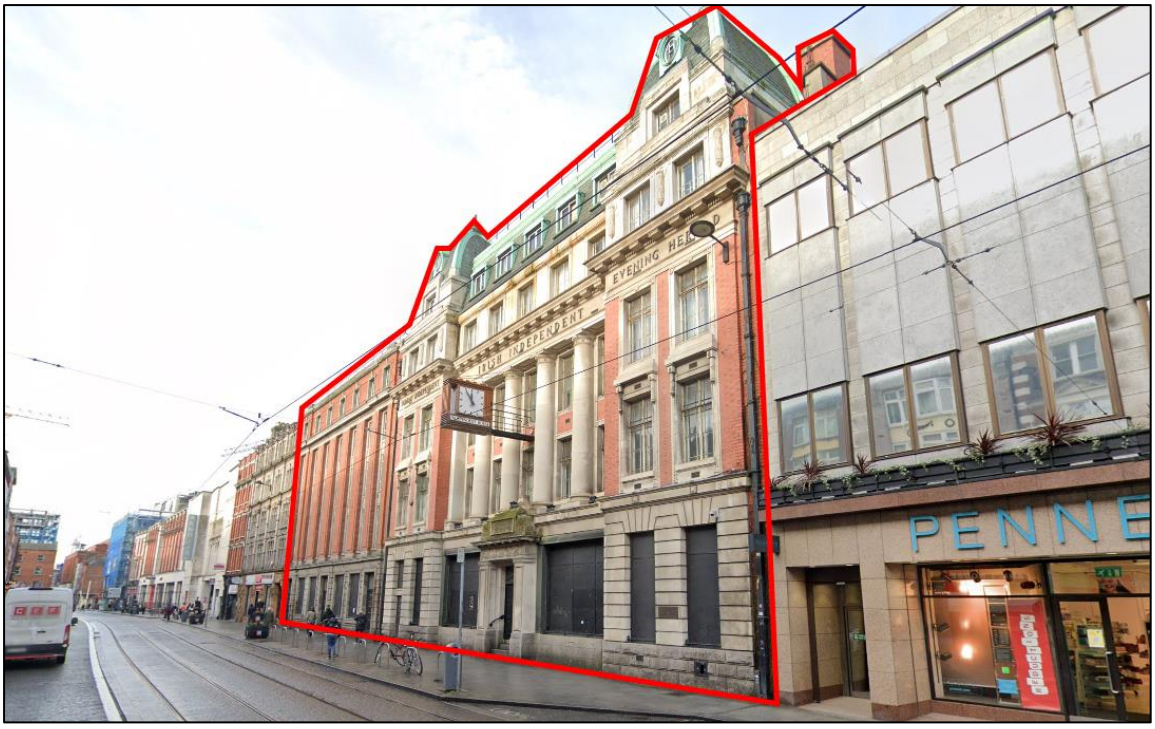


Figure 1.1: **View of Subject Site (Indicatively Outlined in Red) Along Middle Abbey Street**

(Source: **Google Maps Street View (Imagery Date – January 2022), Annotated by Thornton O'Connor Town Planning, 2025)**

1.2 Summary of the Proposed Development

Summix IHD Developments Limited intend to apply to Dublin City Council for a permission for a Large-Scale Residential Development principally comprising Student Accommodation at a c. 0.3 Ha site at Nos. 87-93 Middle Abbey Street, Dublin 1, D01 NH70 (known collectively as 'Independent House'). The site is generally bound by Prince's Street North to the north, William's Lane and Nos. 94-96 Middle Abbey Street to the west, Middle Abbey Street to the south, and Nos. 35-39 O'Connell Street Lower (known as 'Penneys') to the east. The site comprises 6 No. interconnecting, long-standing vacant structures as follows: (a) a principally part 5 No. to part 6 No. storey above basement level building fronting Middle Abbey Street, known as Independent House, with a single storey workshop building to the rear; (b) a 5 No. storey (above basement level) building at the corner of Middle Abbey Street and William's Lane, known as Emerald Chambers; (c) a triple height (at basement level) structure towards the centre of the site, known as the 'Printing Hall'; (d) a 2 No. storey (above basement level) warehouse and office fronting William's Lane; (e) a part 3 No. to part 4 No. storey (above basement level) loading bay and office fronting Prince's Street North; and (f) a 3 No. storey (above basement level) office in the eastern portion of the site, bounded by Penneys. The site includes 2 No. Protected Structures (RPS Ref. Nos. 18 & 8797).

The development's surface water and foul water drainage network shall discharge from the site into the existing combined sewer located along Prince's Street North to the north-west of the site. A new pedestrian crossing and upgrade works to the footpath and kerb along Prince's Street North are proposed. Public realm improvements are also proposed to William's Lane. The development site area, drainage works, road works and public realm improvements will provide a total application site area of c. 0.33 Ha.

The development will principally consist of: the retention and refurbishment of part of the building façade along Prince's Street North; the demolition of the 3 No. former warehouses and offices (c. 5,270 sq m) and the lowering of part of the basement level thereat; the demolition of part of the adjoining wall to the north-east of the site, bounding the Penneys loading bay; the partial demolition of the Printing Hall (c. 457 sq m) and the rear of Emerald Chambers (c. 150 sq m) and Independent House (c. 100 sq m); the removal of the existing concrete roof slab at Emerald Chambers to facilitate an increase in floor-to-ceiling height at fourth floor level; the lowering of part of the ground floor level in Independent House and Emerald Chambers for universal access; refurbishment works to the Protected Structures including general internal and external works for conservation repairs, maintenance, change of use and upgrading of the buildings; and the construction of a part 1 No. to part 9 No. storey over basement building connecting into the retained structures and principally comprising 316 No. Student Accommodation bedspaces (267 No. standard rooms, 5 No. accessible rooms, 2 No. twin studios (4 No. bedspaces), 10 No. accessible studios and 30 No. single studios) with associated facilities, which will be utilised for short-term let during student holiday periods. The 272 No. standard and accessible rooms are provided in 42 No. clusters ranging in size from 5 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (c. 644 sq m); 3 No. retail units (c. 216 sq m); a café/restaurant (c. 254 sq m); bicycle stores at basement and ground floor levels; visitor cycle parking spaces; bin stores; ESB substation; hard and soft landscaping; green/blue roofs; new telecommunications infrastructure at roof level, together with all associated equipment; boundary treatments; PV panels; plant; lift overruns; and all associated works above and below ground. The gross floor area of the development is c. 15,413 sq m comprising c. 12,751 sq m above basement level.

1.3 Multi-Disciplinary Team

COMPANY NAME	DOCUMENTS PREPARED
Thornton O'Connor Town Planning No. 1 Kilmacud Road Upper Dundrum Dublin 14 D14 EA89	• Planning Report & Statement of Consistency • Response to Dublin City Council's LRD Opinion • Application Form 19 • Statutory Notices
Henry J Lyons Nos. 51-54 Pearse Street Dublin 2 D02 KA66	• Architectural Drawing Pack • Housing Quality Assessment • Architectural Design Statement
Waterman Moylan Consulting Engineers Block S East Point Business Park Alfie Byrne Road Dublin D03 H3F4	• Drainage and Water Services Drawings • Engineering Assessment Report • Flood Risk Assessment • Storm Water Management Plan • Traffic / Servicing Drawings • Transport Assessment • Travel Plan • Bicycle Parking Management Plan

	• Delivery and Service Management Plan • Resource Waste Management Plan • DMURS Statement of Consistency
Cameo & Partners Design Studio Cargo Works 1-2 Hatfields Waterloo London SE1 9PG	• Landscape Drawings • Landscape Design Access Statement
Model Works Ltd (Model Works) The Old Courtyard Newtownpark Ave Blackrock Co. Dublin A94 YD61	• Townscape and Visual Impact Assessment
Irish Archaeological Consultancy Ltd Archaeology & Conservation Consultants (IAC Archaeology) Unit G1 Network Enterprise Park Kilcoole Co. Wicklow A63 KT32	• Archaeological Assessment
Molloy & Associates Conservation Architects Marley Proby Square Stillorgan Park Blackrock Co. Dublin A94 K4P8	• Architectural Heritage Impact Assessment
Enviroguide Consulting 3D Core C Block 71 The Plaza Park West Dublin D12 F9TN	• Ecological Impact Assessment Report • EIA Screening Report • Statement in accordance with Article 103(1A)a of the Planning and Development Regulations 2001, as amended • Bat Report • Appropriate Assessment Screening Report • Operational Waste Management Plan

O'Connor Sutton Cronin Multidisciplinary Consulting Engineers (OCSC) No. 9 Prussia Street Stoneybatter Dublin D07 KT57	• Climate Action, Energy & Sustainability Report • Window & Microclimate Study • Site Lighting Report • Lighting Drawings
3D Design Bureau Unit 1 Adelphi House George's Street Upper Dun Laoghaire Co. Dublin A96 DX47	• Aerials, CGIs and Verified Views • Daylight and Sunlight Assessment Report
Wave Dynamics Acoustic Consultants Unit 202 Nesta Business Centre Old Airport Road Santry Dublin D09 HP96	• Acoustic Design Statement
AWN Consulting The Techpro Building Clonshaugh Business & Technology Park Dublin 17	• Construction Environmental Management Plan
Turley No. 4 Pembroke Street Upper Dublin 2 D02 VN24	• Social Infrastructure Audit • Cultural Infrastructure (Impact) Assessment
Independent Site Management No. 77 Camden Street Lower Dublin 2 D02 XE80	• Telecommunications Report
Lawler Sustainability Nos. 50-56 Merrion Road Dublin 4 D04 V4K3	• Glint & Glare Assessment Report
Ground Investigations Ireland Catherinestown House Hazelhatch Road	• Waste Classification Report

Newcastle Co. Dublin D22 YD52	
Summix IHD Developments Limited One Spencer Dock North Wall Quay Dublin 1 Dublin	• Student Accommodation Management Plan
Fred Hamond No. 75 Locksley Park Belfast BT10 0AS	• Industrial Heritage Survey
Ayesa Centrepoint Business Park Oak Road Dublin 12 D12 VW27	• Basement Impact Assessment
Road Safety Matters Ltd Urlingford Road Johnstown Co. Kilkenny E41 W721	• Quality Audit Inclusive of Stage 1 Road Safety Audit

1.4 Large-Scale Residential Development Application

Development is classified as a Large-Scale Residential Development ('LRD') as defined under the *Planning and Development (Amendment) (Large-scale Residential Development) Act 2021:*

> "*large-scale residential development' means a development that includes:*
>
> *(a) The development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;*
>
> *(b)* ***The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;***
>
> *(c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or*

(d) *The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c).*

where the LRD floor space of–

(i) in the case of paragraph (a), the building comprising the houses,

(ii) in the case of paragraph (b), the student accommodation,

(iii) in the case of paragraphs (c) and (d), the buildings comprising the house and the student accommodation,

***is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development*" [Our Emphasis]**

As the proposed development seeks to provide Student Accommodation comprising over 200 No. bedspaces, the development is therefore considered a Large-Scale Residential Development. The proposed non-residential floor space totals c. 9% of the LRD floor space provided, ensuring that the proposed Student Accommodation floor space is not less than 70% of the total scheme.

1.5 The Applicant's Development Experience

Summix IHD Developments Limited, a subsidiary of Summix Capital Limited ('Summix'), operate throughout Ireland and the UK and have a strong track record in delivering urban regeneration schemes with particular experience in the development of Purpose-Built Student Accommodation ('PBSA'). In Dublin, Summix secured permission for a 369 No. bedspace Student Accommodation scheme at the former Brewery Block (known as Ardee Point) on Newmarket Square, which has since been constructed and is operated by Nido Living (ABP Reg. Ref. TA29S.305324). Additionally, they secured two PBSA schemes in Cork City in 2018 (CCC Reg. Refs. 17/37257 & 17/37406), totalling 350 No. bedspaces, both of which are now operated by Nido Living and are known as 'Curraheen Point' and 'Broga House', with Broga House including the restoration and incorporation of a Protected Structure into the scheme.



Figure 1.2: Ardee Point Student Accommodation Scheme on Newmarket Square

(Source: Submitted *Architectural Design Statement* by Henry J Lyons Under ABP Ref. TA29S.305324)



Figure 1.3: Broga House Student Accommodation Scheme, Cork City

(Source: O'Mahony Pike Architects Website (www.omahonypike.ie))

The Applicant considers the subject site to be an ideal location for PBSA as it is situated within the very heart of Dublin City Centre in proximity to a number of Third-Level Education Institutions, including Trinity College Dublin, TU Dublin, National College of Ireland, National College of Art & Design, Griffith College Dublin City Centre Campus and Portobello Institute (as

identified in the accompanying *Social Infrastructure Audit*). Additionally, the subject site benefits from its proximity to high-quality public transport options and a multitude of services, facilities and amenities in the City Centre.

As the Applicant has previous experience with the adaptation of Protected Structures for the provision of PBSA bedspaces, they are mindful of the need to protect and enhance the Protected Structures at Independent House whilst still being able to provide much needed PBSA bedspaces at this central site's location.

The subject site, which is currently constrained due to the longstanding vacant buildings, is zoned Z5 ('City Centre') in the *Dublin City Development Plan 2022-2028* whereby a mix of uses (including Student Accommodation, cultural uses, retail and restaurants/cafés) and increased densities are encouraged and supported by this zoning objective, as further detailed in this Report.

1.6 Documents Discussed Throughout this Report

The following documents are discussed throughout this Report:

National

1. *Project Ireland 2040: The National Development Plan 2021-2030;*
2. *Project Ireland 2040: National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
4. *Housing for All – a New Housing Plan for Ireland, September 2021;*
5. *National Student Accommodation Strategy (2017);*
6. *Guidelines on Residential Developments for 3rd Level Students (1999)*
7. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
8. *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)*; and
9. *The Planning System and Flood Risk Management (2009).*

Regional

10. *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly;* and
11. *Metropolitan Area Spatial Plan for Dublin City and Suburbs.*

Local

12. *Dublin City Development Plan 2022-2028.*

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

1.7 Format of this Report

This *Planning Report & Statement of Consistency* comprises the following sections:

Section 1.0:	Introduction
Section 2.0	Site Location, Description and Context
Section 3.0:	Rationale for Development
Section 4.0:	Planning History
Section 5.0:	Details of the Development
Section 6.0:	Statement of Consistency - National Policy Context
Section 7.0:	Statement of Consistency - Regional Policy Context
Section 8.0	Statement of Consistency - Local Policy Context
Section 9.0:	Conclusion

2.0 SITE LOCATION, DESCRIPTION AND CONTEXT

2.1 Site Location

The subject site comprises numerous structures located at Nos. 87-93 Middle Abbey Street and is known collectively as 'Independent House'. There are 2 No. Protected Structures (RPS Nos. 18 & 8797) at the subject site.

The subject site is generally bound by Prince's Street North to the north, William's Lane and Nos. 94-96 Middle Abbey Street to the west, Middle Abbey Street to the south, and Nos. 35-39 O'Connell Street Lower (known as 'Penneys') to the east. William's Lane is a narrow, pedestrian laneway connecting Middle Abbey Street with Prince's Street North and separates the majority of the site from Nos.94-96 Middle Abbey Street to the south-west, which is also a Protected Structure (RPS Ref.19).

The location of the subject site is identified in Figure 2.1.

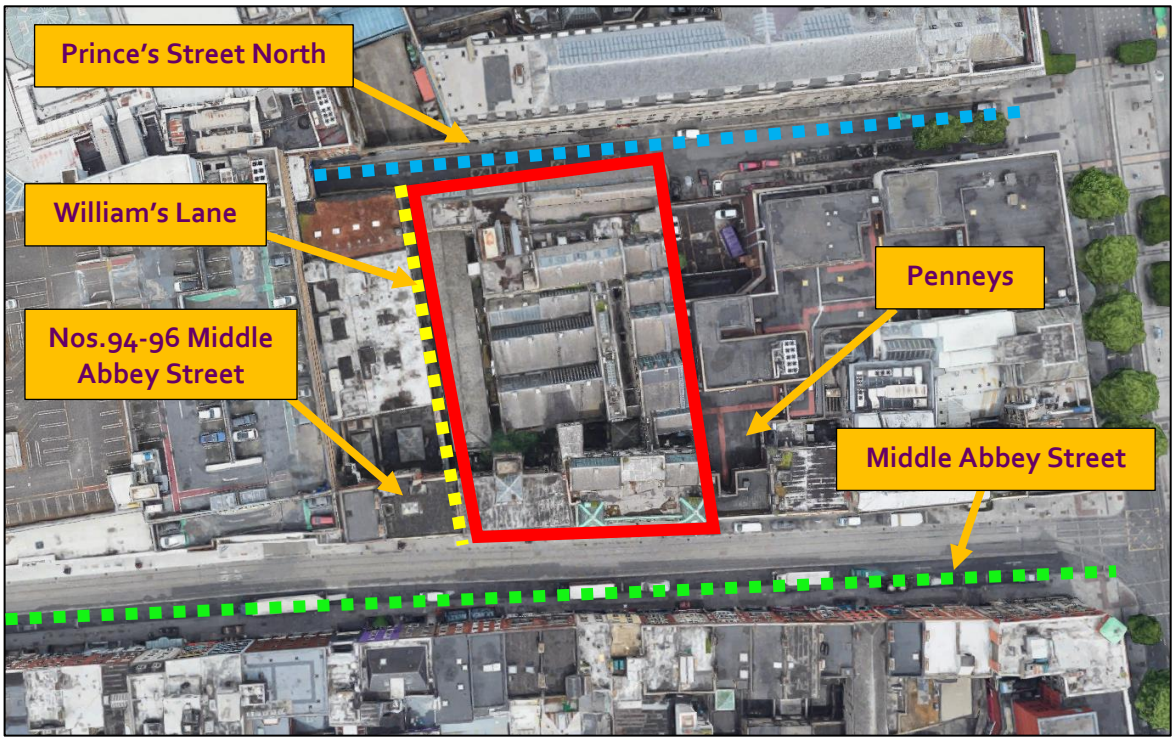


Figure 2.1: **Aerial View Map Showing the Location of the Subject Site (Indicative Boundary of the Combined Structures on Site Outlined in Red)**

(Source: **Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)**

2.2 Site Description

The subject site and development comprise the following elements:

1. The **main development site** measures c. 0.3 Ha.

2. There are **drainage works, road works and public realm improvements that are outside the main development site** and equate to total area of c. 0.03 Ha. These works include:

    a. The discharge of the developments surface water and foul water drainage network from the site into the existing combined sewer located along Prince's Street North to the north-west of the site;

    b. a new pedestrian crossing and upgrade works to the footpath and kerb along Prince's Street North; and

    c. general public realm improvements along William's Lane.

3. The **total site** area including the main development site, drainage works, road works and public realm improvements measures c. 0.33 Ha.

For the rest of this Report the site area will be referenced as c. 0.3 Ha as this is the main development site and is the figure utilised when discussing density.

2.2.1 Brief History of the Subject Site

The accompanying *Architectural & Heritage Impact Assessment* prepared by Molloy & Associates Conservation Architects provides a detailed description of the subject site and how it has evolved throughout the years. In summary, the subject site originally formed individual linear plots between Nos. 87-93 Middle Abbey Street (inclusive) and were later amalgamated into two plots as Nos. 87-90 Middle Abbey Street and Nos. 91-93 Middle Abbey Street. After the destruction of nearly all of the buildings on site in 1916, an office building and a large warehouse were constructed at Nos. 91-93 Middle Abbey Street in 1922, followed by the construction of front, rear and side office buildings, loading bay and a central printing machine room at Nos. 87-90 Middle Abbey Street in 1924.

Between 1936 to 1939, Nos. 91-93 Middle Abbey Street was acquired by the owners of Nos. 87-90 Middle Abbey Street (Independent Newspapers), and they redeveloped the rear of Nos. 91-93 Middle Abbey Street to expand operations. This included the extension of the printing machine room further west, forming a large Printing Hall, and the construction of a new part 3 No. to part 4 No. storey (above basement) office to the rear of the site along Prince's Street North, adjoining the existing loading bay and offices. All structures at Nos. 91-93 and Nos. 87-90 Middle Abbey Street were interconnected internally to ensure the efficient operations of the Independent Newspapers up until the printing press operations ceased on site in 2000 with the offices later closing in 2004.

Since the full closure of Independent Newspaper at the site in 2004, Independent House has remained vacant and it has significantly deteriorated as there has been little to no protective measures put in place or repair works carried out prior to the Applicant's recent purchase of the site, leading to the derelict nature of the existing buildings.

2.2.2 Current Structures on Site

To ensure there is a clear understanding of the works proposed under this LRD application at the subject site, which is discussed in detail in Section 5.0 of this Report, the site is broken up into 6 No. structures.

The 6 No. interconnecting, long-standing vacant structures are described as follows:

(a) a principally part 5 No. to part 6 No. storey above basement level building fronting Middle Abbey Street, known as **Independent House**, with a single storey workshop building to the rear;

(b) a 5 No. storey (above basement level) building at the corner of Middle Abbey Street and William's Lane, known as **Emerald Chambers**;

(c) a triple height (at basement level) structure towards the centre of the site, known as the '**Printing Hall**';

(d) a 2 No. storey (above basement level) **warehouse and office fronting William's Lane**;

(e) a part 3 No. to part 4 No. storey (above basement level) **office and loading bay fronting Prince's Street North**; and

(f) a 3 No. storey (above basement level) **office in the eastern portion of the site**, bounded by Penneys.

The 6 No. structures are identified in Figures 2.2 – 2.4.

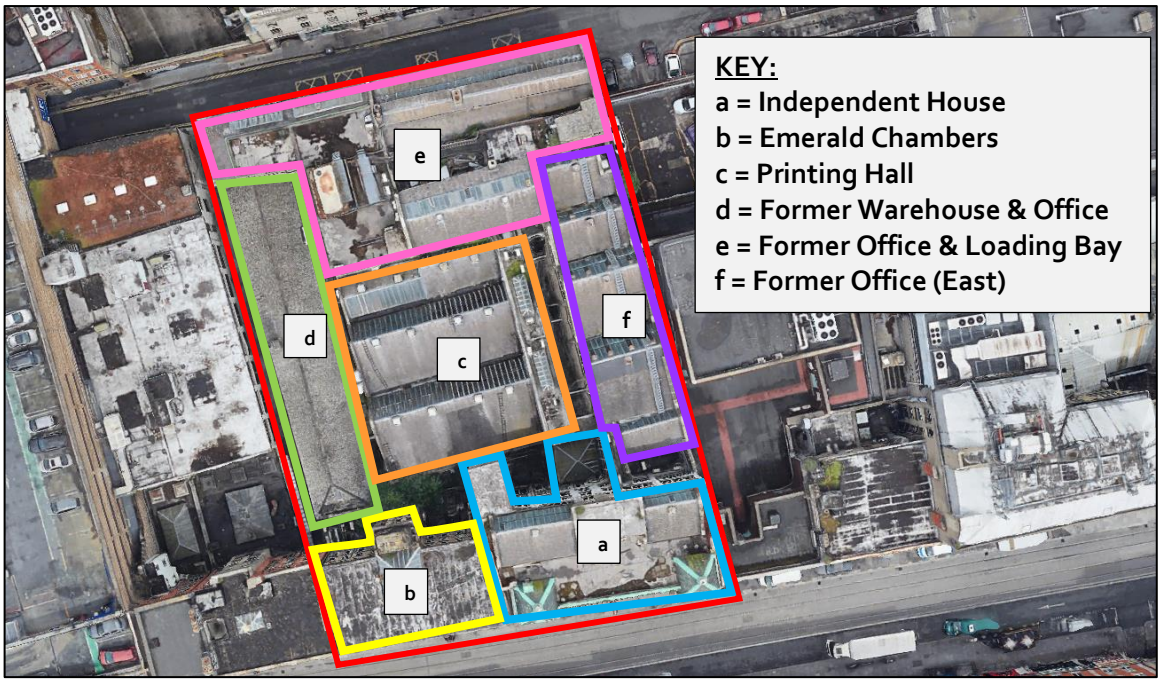


Figure 2.2: **Identification of the Numerous Interconnecting, Long-Standing Vacant Structures at the Subject Site (Indicative Boundaries Outlined Only)**

(Source: **Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)**

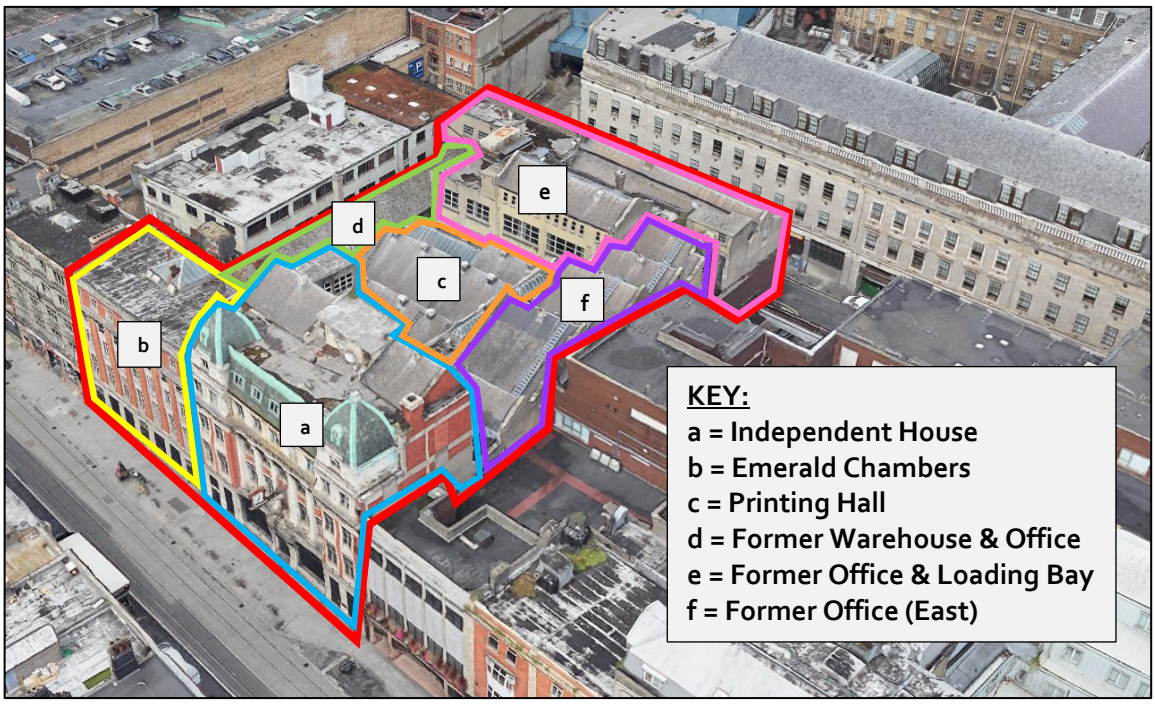


Figure 2.3: **View of the Numerous Structures at the Subject Site (Indicative Boundaries Outlined Only)**

(Source: **Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)**

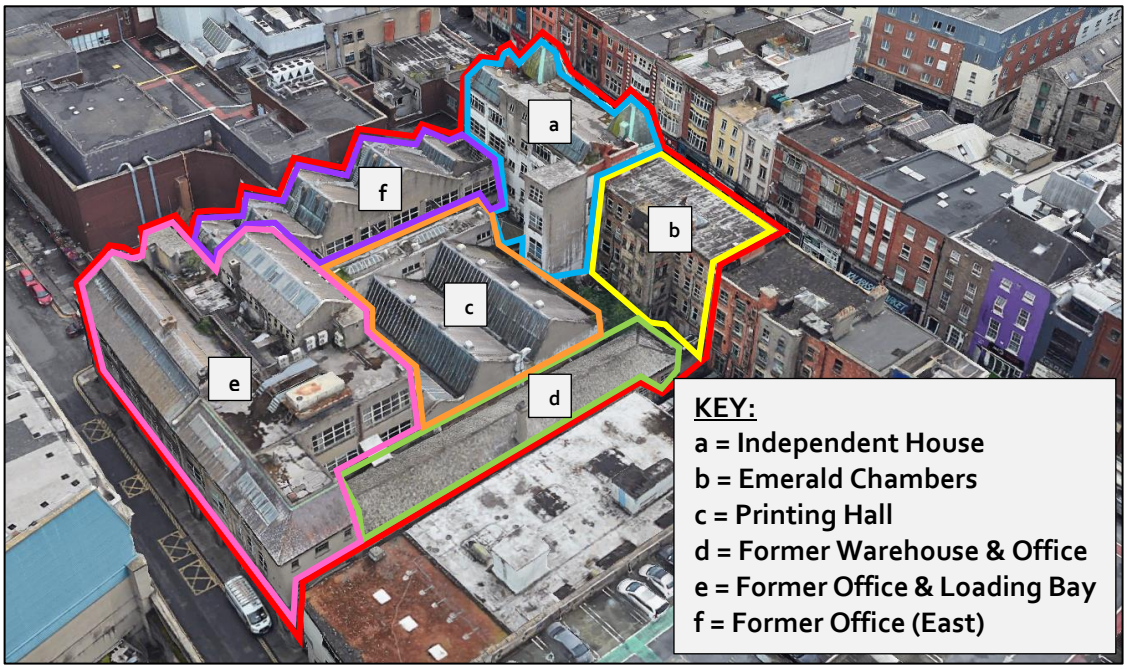


Figure 2.4: **View of the Numerous Structures at the Subject Site (Indicative Boundaries Outlined Only)**

(Source: **Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)**

a) Independent House – Fronting Middle Abbey Street

The principally part 5 No. to part 6 No. storey above basement structure fronting Middle Abbey Street, also known as Independent House, with a single storey workshop building to the rear, is

of historic and architectural interest and its distinctive roofscape and façade undeniably contributes to the streetscape. The nine-bay, neoclassical office building, along with part of the Printing Hall and the office and warehouse structures to the rear, were purpose built in 1924 for the operations of Independent Newspaper. Please refer to the *Architectural & Heritage Impact Assessment* prepared by Molloy & Associates Conservation Architects for a detailed description of the history of Independent House.

As illustrated in Figure 2.5 below, the façade of Independent House includes the original bronze lettering between second and third floor which state 'Sunday Independent' along the western section; 'Irish Independent' along the centre; and 'Evening Herald' along the eastern section. As illustrated in Figure 2.6, above the main entrance to the structure along Middle Abbey Street is a framed panel with brass lettering stating, 'Independent Newspapers Limited', and further above this, between first and second floor, is a projecting Art-Deco-style bronze clock which is a later addition as it replaced the original circular clock.



Figure 2.5: **Front Elevation of Independent House Along Middle Abbey Street (Indicatively Outlined)**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, Annotated by Thornton O'Connor Town Planning, 2025)**



Figure 2.6: **Image of the Art Deco-Style Bronze Clock Above the Framed Panel and Main Entrance to Independent House Along Middle Abbey Street**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

Internally, the features of interest include the concrete frame system, architectural joinery and neo-classical plasterwork to ceilings throughout the building (Figure 2.7). There has been some contemporary works carried out internally throughout the years, particularly fittings, uPVC windows, doors, partition walls and suspended lay-in ceiling tiles (Figure 2.8). The majority of rooms and spaces throughout Independent House have been fitted with exposed services such as ceiling lights, wall switches and sockets, and fire sprinklers. As is evident in Figures 2.7 & 2.8, Independent House has experienced significant damage and deterioration to the interior of the structure.



Figure 2.7: **Images of Some Original, Internal Features of Independent House, Including Plasterwork and Cast-Iron Window Frames & Radiators**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**



Figure 2.8: **Images of Some Contemporary, Internal Features of Independent House, Including Exposed Services, Doors, Fittings, Suspended Lay-In Ceiling Tiles and uPVC Windows**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

b) Emerald Chambers

There is a seven-bay, 5 No. storey (above basement) structure at the corner of Middle Abbey Street and William's Lane, adjacent to Independent House, and is known as Emerald Chambers. Emerald Chambers is of historic and architectural interest. It operated as one of the offices for Independent Newspapers and was connected internally to Independent House on all levels, with internal steps provided between the two structures to resolve differing levels. Please refer to the *Architectural Heritage Impact Assessment* prepared by Molloy & Associates Conservation Architects for a detailed description of the history of Independent House.

As illustrated in Figure 2.9 below, Emerald Chambers comprises rusticated granite walls at ground floor and red brick on the upper floors. Emerald Chambers adjoins Nos. 94-97 Middle Abbey Street and the attractive entrance leading to William's Lane which is integrated into the façade of Nos. 94-97 Middle Abbey Street. Internally, the features of interest include the

architectural joinery and neo-classical plasterwork to ceilings throughout the building (Figure 2.10). Similar to Independent House, there has been some contemporary works carried out internally (Figure 2.11).

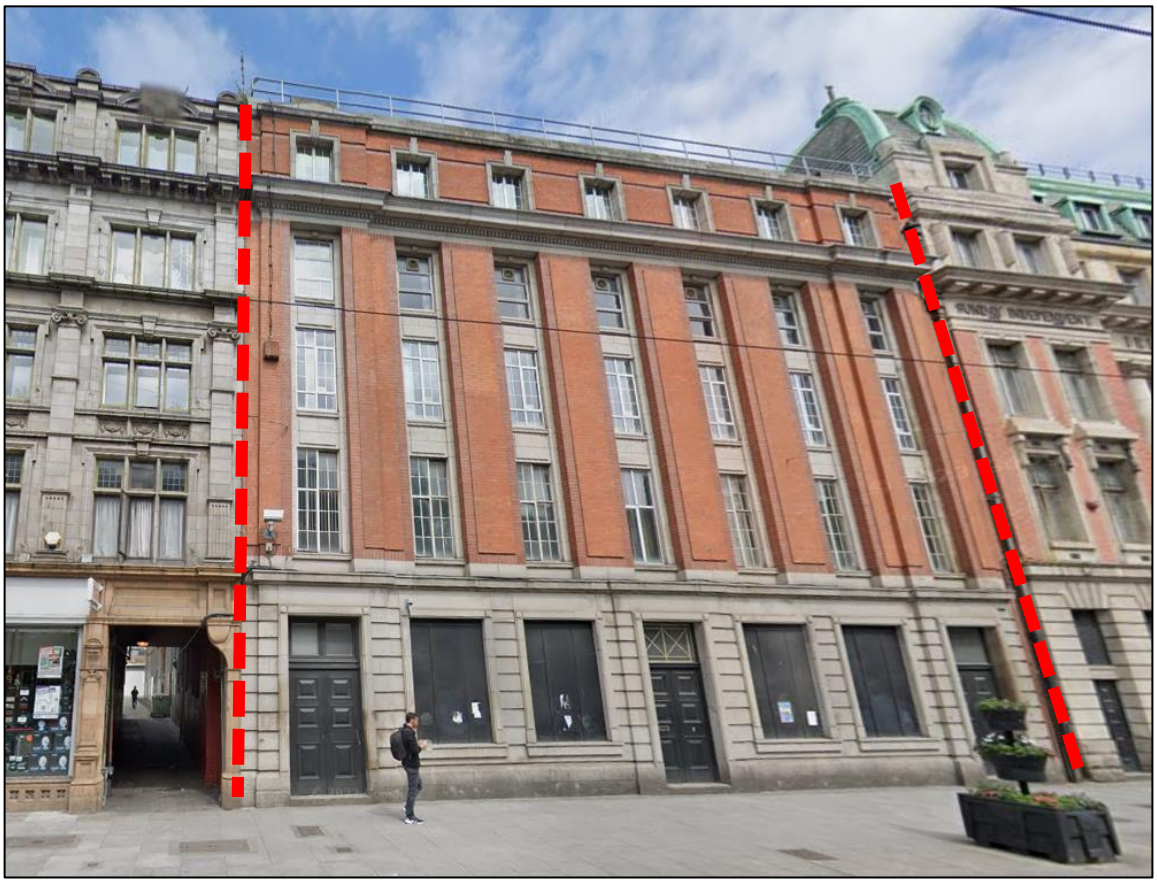


Figure 2.9: **View of Emerald Chambers (Indicative Boundary) and the Entrance to William's Lane (Built into the Façade of Nos. 94-97 Middle Abbey Street)**

(Source: **Google Maps Street View (Imagery Date – June 2022), Annotated by Thornton O'Connor Town Planning, 2025)**

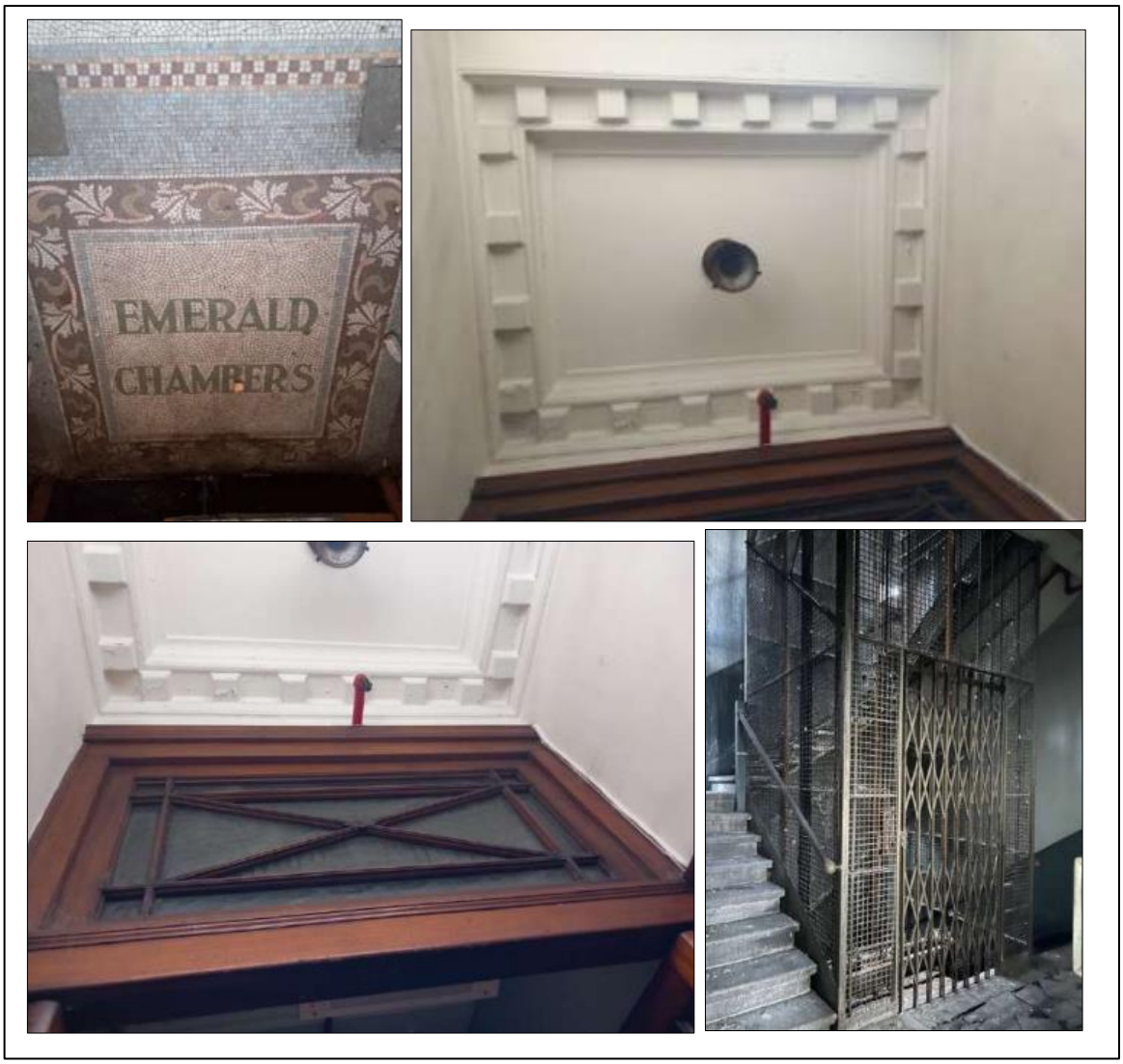


Figure 2.10: **Images of Some Original, Internal Features of Emerald Chambers, Including the Mosaic Floor in the Entrance Lobby with 'Emerald Chambers' Lettering, Molilion Cornice and Passenger Lift with Traditional Cage**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**



Figure 2.11: **Images of Some Contemporary, Internal Features of Emerald Chambers, Including Exposed Services, Partition Walls, and Suspended Lay-In Ceiling Tiles**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

c) Printing Hall

There is a triple height (at basement level) structure towards the centre of the site which was previously used as a Printing Hall during the operations of Independent Newspaper Group up until 2002. The Printing Hall was extended between 1936-1939 as part of the acquisition of Independent Newspapers of Nos. 91-93 Middle Abbey Street.

As illustrated in Figure 2.12, all machinery associated with the former printing press has been removed and part of the upper floor gallery was demolished. The demolition of part of the upper floor has revealed the composition of the floors to be reinforced mass concreate, supported on steel girders. The distinctive sawtooth roof profile is formed over heavy steel beams with lightweight steel trusses over masonry piers and columns.

Please refer to the *Architectural Heritage Impact Assessment* prepared by Molloy & Associates Conservation Architects for a detailed description of the Printing Hall.



Figure 2.12: Images of the Printing Hall Indicating the Demolished Upper Floor Gallery

(Source: *Architectural Heritage Impact Assessment* by Molloy & Associates Conservation Architects, 2025)

d) Warehouse & Office Along William's Lane

The 2 No. storey (above basement level) warehouse and office located along William's Lane was part of the redevelopment of the site in 1936-1939. The façade of the building along William's Lane, as illustrated in Figure 2.13, comprises stock brick wall finish with areas of cement render and a mix of original, multipaned metal windows and contemporary windows. As illustrated in Figure 2.14, the building includes contemporary fittings, services and partitions.



Figure 2.13: **Images of the Western Elevation of the Former Warehouse Along William's Lane**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

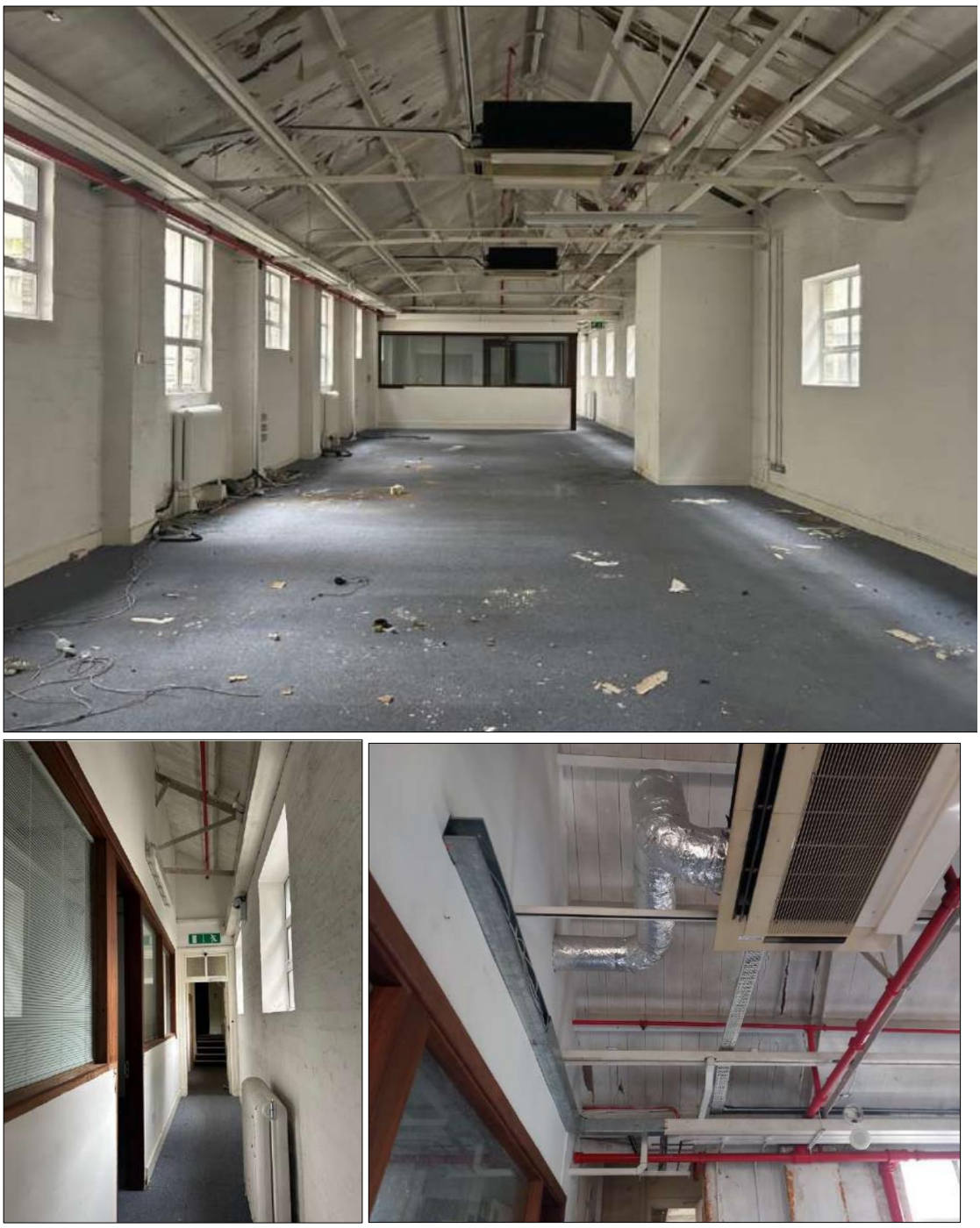


Figure 2.14: **Images of the Contemporary Fittings, Services and Partitions in the Office Accommodation Part of the Building**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

e) Loading Bay & Office Accommodation Along Prince's Street North

The part 3 No. to part 4 No. storey (above basement level) loading bay and office accommodation located along Prince's Street North is of architectural interest due to the loading bay openings along the northern elevation and elements of original fabric surviving at street level. The western portion of the building was part of the redevelopment of the site between 1936-1939.

As illustrated in Figure 2.15, the three former vehicle openings to the loading bay along Prince's Street North have been previously modified to create larger openings; however, there are some features and fabric of the building that have remained intact. This includes the cornice and original wall mounted bronze light fitting over one of the entrances, multipaned metal framed windows at ground floor level, and glazed brick piers with bullnose brick detail at corners and surrounded by Art Deco style stepped cornice. As illustrated in Figure 2.16, cement render covers the façade of the western portion of the building, offering little architectural interest.



Figure 2.15: **Images of the Northern Elevation of the Loading Bay & Office Accommodation Along Prince's Street North**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**



Figure 2.16: Image of the Western Portion of the Loading Bay & Office Accommodation Along Prince's Street North

(Source: Google Maps Street View (Imagery Date – August 2018))

The inside of the building includes some original doors, metal framed windows, and glazed brick finished wall (Figure 2.17); however, as illustrated in Figure 2.18, the building has been subject to various contemporary interventions such as partition walls, doors, uPVC windows, suspended lay-in ceiling tiles and exposed services. This is also evident in the extension added on between 1936-39 illustrated in Figure 2.19. With the addition of numerous non-original partition walls, the original layout of the building is mostly limited to the ground floor loading bay, as illustrated in Figure 2.20.



Figure 2.17: **Images of the Original Windows and Door Within the Upper Floor Office Accommodation Along Prince's Street North**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**



Figure 2.18: **Images of the Contemporary Ceilings, Partition Walls and Services Within the Upper Floor Office Accommodation Along Prince's Street North**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

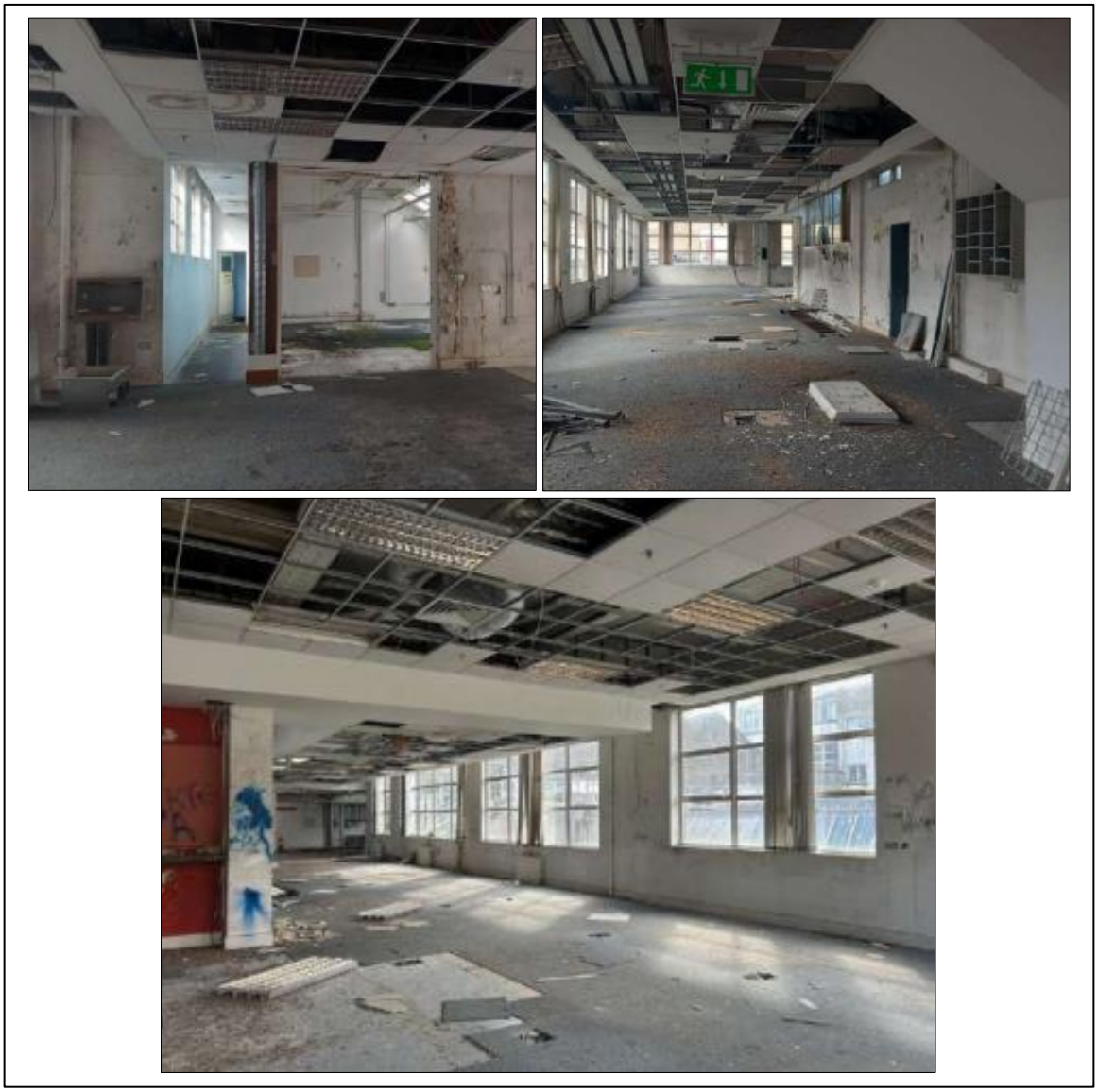


Figure 2.19: **Images of the Contemporary Ceilings, Partition Walls and Services Within the Upper Floor Office Accommodation Extension Along Prince's Street North**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

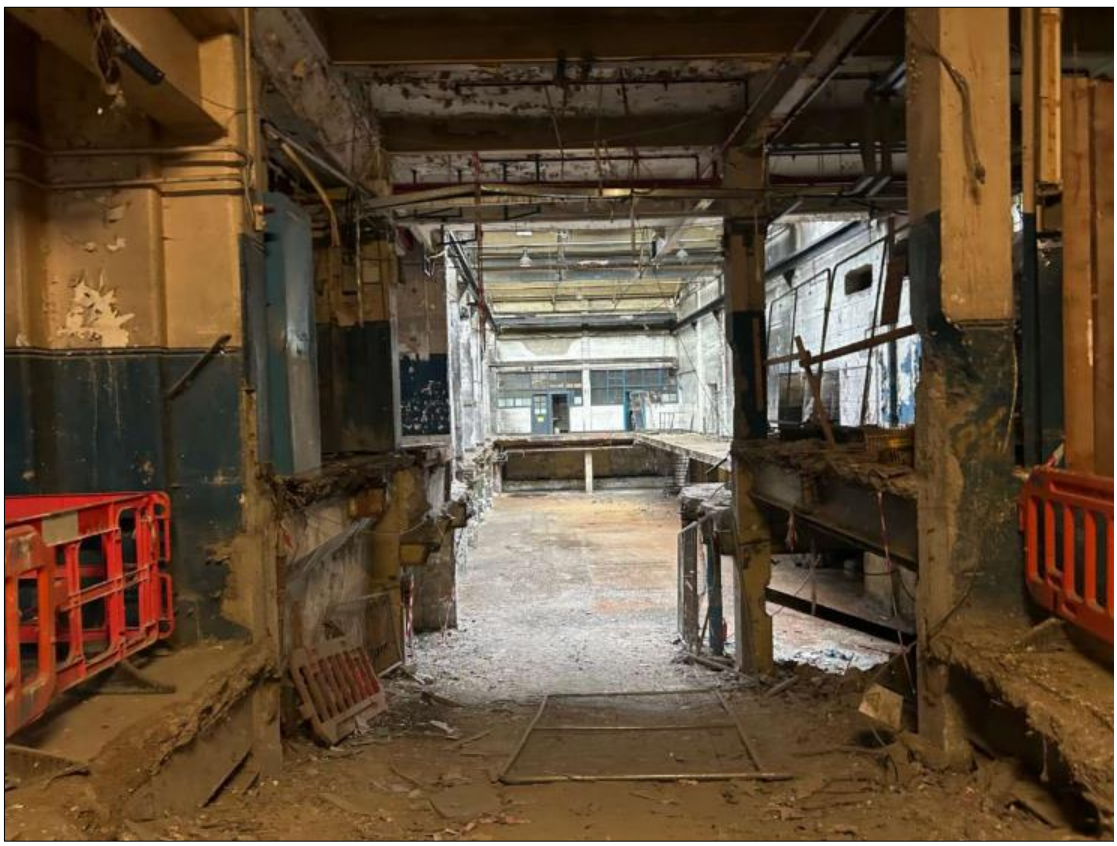


Figure 2.20: **Images of the Loading Bay Along Prince's Street North**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

f) Office Accommodation in the Eastern Extent of the Site

The 3 No. storey (above basement level) office in the eastern portion of the site is bounded by Penneys to the east. The façade of the building, when viewed along Prince's Street North, comprises contemporary red brick and cement render, offering little architectural interest; however, the sawtooth roof profile is of architectural interest. This is illustrated in Figure 2.21.

As illustrated in Figure 2.22, there are some original partition screen walls and door joinery; however, Figure 2.23 provides images of the various contemporary interventions such as partition walls, doors, uPVC windows, suspended lay-in ceiling tiles and exposed services.



Figure 2.21: **Image of the Eastern Elevation and Roof Profile of the of the Office Accommodation within the Eastern Extent of the Site**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**



Figure 2.22: **Images of Original Doors and Partitions Within the Office Accommodation within the Eastern Extent of the Site**

(Source: ***Architectural Heritage Impact Assessment*** **by Molloy & Associates Conservation Architects, 2025)**

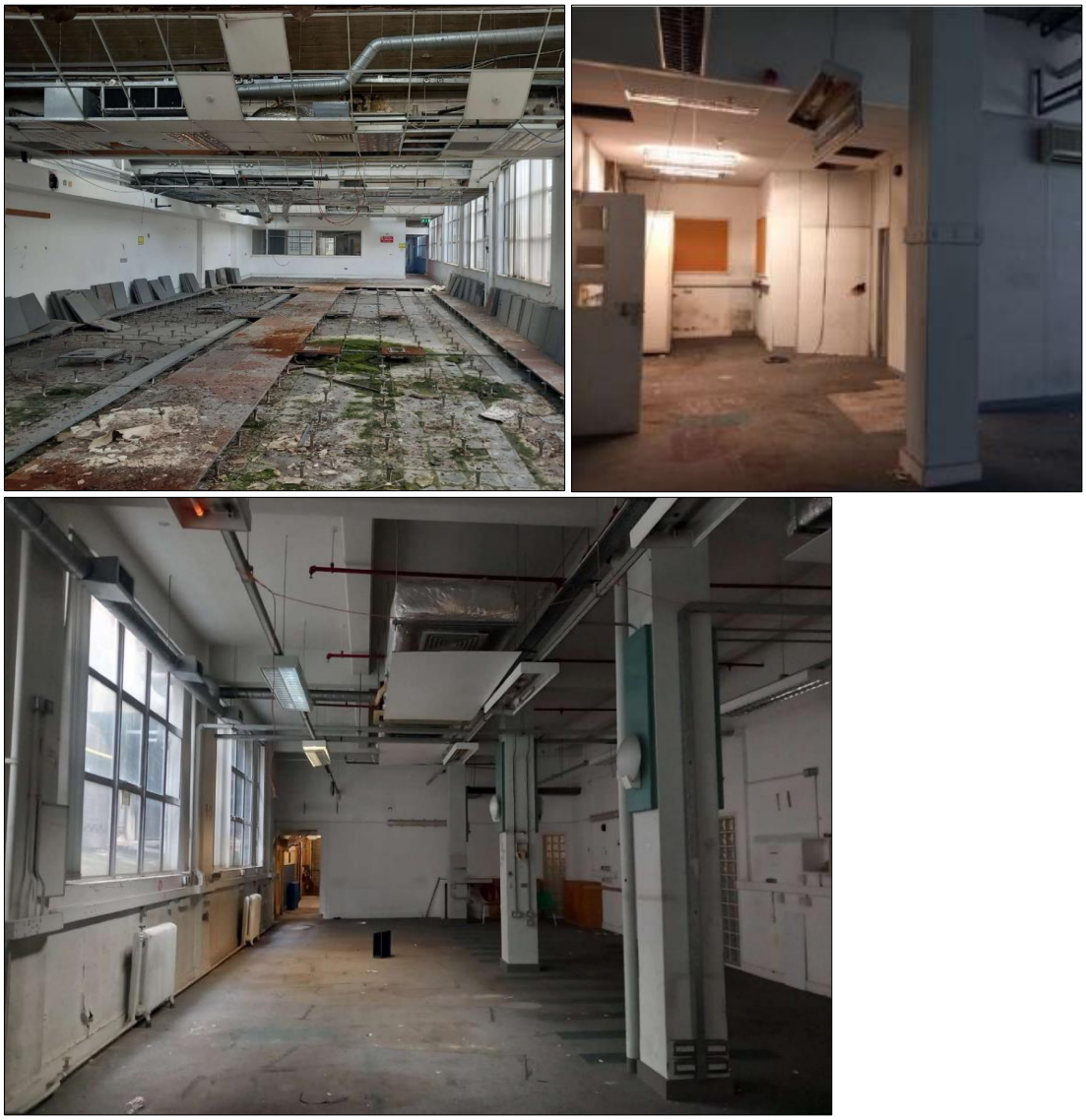


Figure 2.23: Images of Contemporary Partitions, Services and Windows Within the Office Accommodation within the Eastern Extent of the Site

(Source: *Architectural Heritage Impact Assessment* by Molloy & Associates Conservation Architects, 2025)

Concluding Remark

As illustrated in some of the above Figures, there is evident internal damage to all 6 No. structures at the subject site. The deterioration and degradation of the structures has worsened throughout the years due to its long-standing vacancy, with water leaks and general wear and tear of fabric having damaged a lot of original and non-original features such as the neo-classical plasterwork to the ceilings in Independent House. Without intervention and finding a suitable and viable use for the building, the structure will continue to deteriorate and further damage to original fabric is inevitable.

Please refer to the *Architectural Heritage Impact Assessment* prepared by Molloy & Associates Conservation Architects for a full detailed description of the structures at the subject site and their architectural significance.

2.3 Site Context & Accessibility

The subject site is well located in terms of its siting. Some of the largest shopping streets in Dublin are located under 100-metres from the subject site, such as Henry Street to the north and O'Connell Street to the east. The subject site is also within easy walking distance to Temple Bar via The Ha'penny Bridge and Grafton Street via O'Connell Bridge.

The surrounding area of the subject site is characterised by a variety of uses. Notable businesses on the busy commercial street along Middle Abbey Street includes Arnotts department store, The Academy music venue, Penneys and Eason bookstore which is situated on the corner of Middle Abbey Street and O'Connell Street.



Figure 2.24: View of Subject Site (Indicatively Outlined in Red) Along Middle Abbey Street

(Source: Google Maps Street View (Imagery Date – January 2022), Annotated by Thornton O'Connor Town Planning, 2025)

A number of new developments have been recently completed or are under construction along Middle Abbey Street and further west along Upper Abbey Street. These include the part 6 No. to part 8 No. storey Motel One hotel on the corner of Liffey Street, the 11 No. storey Clink I Lár hostel on Abbey Street Upper and the 8 No. storey hotel on the former Twilfit House site.

Middle Abbey Street enjoys excellent connectivity to various modes of transportation. The Luas Red Line runs along Middle Abbey Street itself with nearby stops located at Jervis (c. 300-metres/4-minute walk) and Abbey Street Lower (c. 200-metres/4-minute walk). The Luas Green Line services are located a short distance away with northbound trams stopping on O'Connell Street (c. 100-metres/2-minute walk) and southbound trams stopping on Marlborough Street (c. 300-metres/4-minute walk). There are numerous bus stops in close proximity to the site along O'Connell Street and Lower Abbey Street, providing c. 31 No. Dublin Bus routes. This is in addition to the interurban bus services operating at Busaras, located c. 700-metres/10-12-minute walk from the site, as well as Aircoach, City Link and Wexford Bus services. Tara Street Station

is the closest DART station and is situated c. 500- metres/10-minute walk from the subject site. Connolly Station is also located only c. 900-metres/13-minute walk from the site.

The wider context and accessibility of the subject site is illustrated in Figure 2.25.

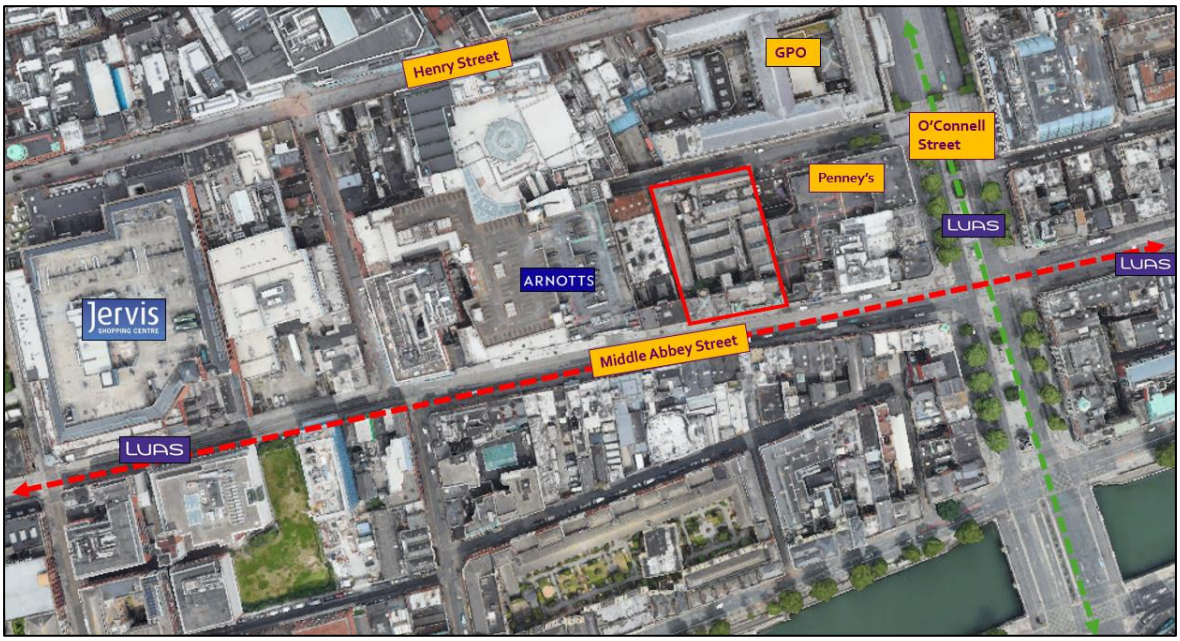


Figure 2.25: Wider Context of the Subject Site

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)

3.0 RATIONALE FOR DEVELOPMENT

The Applicant, Summix IHD Developments Ltd, intends to develop a mixed-use development principally comprising 316 No. Student Accommodation bedspaces with ancillary communal spaces. The development will also include the provision of cultural/community space, 3 No. retail units and a café/restaurant.

3.1 National Demand for Student Accommodation

Insufficient supply of Student Accommodation in Dublin has been an on-going issue for many years due to the rising population and increase in students coming from abroad wishing to study in Ireland.

The 'Lisney' *Property Outlook Report* (2024)[3], published in January 2024, states that "*despite the exceptionally strong occupier, operator and investor demand, new supply continues to lag behind what is required*". The report also notes that:

> *"The most recent data is from the 2022 / 2023 academic year, and it shows that there were almost 257,000 students enrolled in Higher Education Institutions with 199,000 of these in full-time education.* ***Since 2016 (six years), full-time student numbers have grown by 10.2%.*** *However, more importantly in terms of the student accommodation sector, the number of international students has jumped by 42% to 33,500 (15% of the student population in Ireland)."* **[Our Emphasis]**

It goes on to state that due to a number of reasons, including the on-going rental / housing crisis in Ireland, that "*occupational demand for the PBSA sector will remain exceptionally strong in 2024 and beyond. Indeed, most operators are at full capacity*".

An updated *Property Outlook Report* (2025)[4] states that "*New supply continues to lag what is required.*". The report also notes that:

> *"In the 2023 / 2024 academic year, there were almost 266,000 students enrolled in Higher Education Institutions with 206,400 of these in full-time education.* ***Since 2016 / 2017, student numbers have grown by 17.9%.*** *However, more importantly in terms of the PBSA sector, the number of international students has jumped by 63.4% to 40,400 (with India, China and the US making up 42% of the overseas total) with 15.2% of the total student population now international. Changing policies in other destinations (such as the UK, Australia and Canada), along with greater Government focus on the higher education sector in Ireland (with a dedicated cabinet minister) have been two of the key reasons for growth in the sector.* ***The availability of on or near-campus accommodation for these international students is essential in continuing to attract them and the economic benefits they bring****.*
>
> *While the student population has grown substantially in a short space of time, it is likely to grow by up to 20% in the next five years, which would result in nearly 40,000 more students in education.* ***Combined with the ongoing rental / housing crisis in Ireland, as well as the elevated number of domestic students commuting unsustainably long distances several times a week to university or college, occupational demand for the PBSA sector will remain exceptionally strong in 2025 and beyond****."* **[Our Emphasis]**

[3] https://www.lisneymedia.com/outlook2024/
[4] https://lisney.com/Outlook2025

The Lisney Reports ultimately highlight that there will be a significant increase in the student population in the coming years, including international students; however, there will be a strong occupational demand and lack of PBSA to support the increased student population.

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

Rebuilding Ireland is the Government's publication which recognises that a significant increase in new homes is needed to address the national housing crisis. In relation to Student Accommodation, *Rebuilding Ireland* notes that the student population is projected to grow by approximately 20,000 No. students (or 15%) to approximately 193,000 No. students by 2024. As demonstrated in the 2025 Lisney Report, there were almost 266,000 students enrolled in Higher Education Institutions in the 2023/2024 academic year, which significantly exceeds the anticipated growth as stated in *Rebuilding Ireland.*

Rebuilding Ireland notes that the *'Report on Student Accommodation: Demand and Supply'* (2015) by the Higher Education Authority estimates that there is an unmet demand of approximately 25,000 No. student bedspaces nationally and that this number will need to be met in order to keep up with the continuous demand for Student Accommodation resulting from the growth of the student population. The Government of Ireland produced a report called '*Quarter 3 2019 Progress Report on the National Student Accommodation Strategy*' which details the progress in the supply of Student Accommodation until near the end of 2019. The year-end 2017, national figures showed a total of c. 15,902 No. student bedspaces that were either completed or in the planning and development process. By the end of 2018 this figure had risen to 19,293 No. student bedspaces. By the end of Q3 2019 the total potential figure had risen to 23,649 No. student beds.

As there has evidently been a significant increase in the student population since the *Report on Student Accommodation: Demand and Supply,* the *National Student Accommodation Strategy* and the *Quarter 3 2019 Progress Report on the National Student Accommodation Strategy* were published, as confirmed in the Lisney Reports above, the estimated number of student bedspaces that are required to keep up with the demand has deeply intensified and "*occupational demand for the PBSA sector will remain exceptionally strong in 2025 and beyond*."

In an article entitled "*'Severe' lack of student accommodation has made couch surfing and dropping out a reality*' published on 17th January 2024[5] by the Irish Examiner, the following is noted:

> *"University College Cork's Students' Union (UCCSU) urged the Government to address the accommodation crisis at the launch of its tenancy rights campaign on Wednesday with housing charity Threshold, designed to inform student renters of their rights.*
>
> *It said that 'severe' lack if student accommodation has made couch surfing and dropping out of courses a reality, while others are working instead of attending lectures in order to pay their rent.*
>
> *UCCSU engagement officer Hayley O'Connell said they have heard "horror stories" from students who live in cold and damp conditions despite paying "ridiculous" amounts of rent.*

[5] https://www.irishexaminer.com/news/munster/arid-41311147.html

> *They described the current outlook on student accommodation as "bleak" adding that although the majority of students source accommodation at "ridiculous rents", some are less fortunate and end up deferring or dropping out of their course."*

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

Another protest was held only one year later, on 4th October 2023, and was organised again by the USI. In an article entitled '*'It's impossible to study this way': students protest in Dublin to call for housing solution*', published on 4th October 2023[6] by The Irish Times, notes the many experiences of students that must commute long and unsustainable distances every day to get to classes as a result of the Student Accommodation crisis. The following stories and experiences of students are noted:

> *"Mr Hanley has commuted to college from his home since first year. "Commuting in, every day, by car is not sustainable, it's not practical, it's just impossible to try to study this way."*
>
> *Colm Breslin (22), a coursemate of Mr Hanley's, said he knew of a student on their degree course travelling from Co Roscommon every day. "It's insane that she has to travel that far, because she can't afford to live in Dublin."*
>
> *Julie Stroemple (20), from Cleveland in the United States and studying political science at Trinity College, spends three hours commuting to college from Maynooth every day. "[It] affects my studies and my mental health as well."*
>
> *Standing beside Ms Stroemple, Libby Marchant (21), from Waterford, said that she had joined the protest to support those "who have large problems trying to find accommodation"."*

What is frighteningly becoming a yearly occurrence, on 17th October 2024, another protest was organised by the USI relating to the same concerns of protests from the previous years. In an article entitled '*National walk-out protests 'huge deficit of accommodation' pricing students out of education*' published on 17th October 2024[7] by the Irish Examiner, highlights the "*anger and frustration*" felt by students due to a lack of Student Accommodation. The USI President noted that they see students "*commuting long distances or are sleeping in cars or on friend's sodas in order to attend college*" and that this "*is affecting their academic performance, and it's also affecting their mental health*". The article also notes a letter sent to the Taoiseach (at the time) from Munster Technological University in Cork, which raises significant concerns regarding their students wellbeing due to lack of accommodation:

> *"This is no longer just a housing issue. It's an education crisis. How can students excel in their studies when they are constantly worried about where they'll sleep at night?"*

[6] https://www.irishtimes.com/ireland/education/2023/10/04/its-impossible-to-study-this-way-students-protesting-in-dublin-call-for-housing-solution/

[7] https://www.irishexaminer.com/news/arid-41497973.html

In an article entitled *'Student accommodation crisis: Three applications for every bed on campus'*, published on 16th September 2024[8] by the Irish Times, the following is noted:

> *"Universities are citing significant increases in demand for campus accommodation and the Department of Education is looking at ways to help with accommodation costs through the Student Universal Support Ireland (Susi) system, according to a new paper published by the department.*
>
> *Current figures received by higher education institutes show that publicly owned purpose-built student accommodation was oversubscribed by approximately 29,773 applications for the 2023/2024 academic year, the paper said.*
>
> *Construction cost increases, fuelled by the Russian invasion of Ukraine, Brexit and Covid, are having a significant impact on the supply and affordability of new rental accommodation for higher-level students, "with the estimated construction price for student accommodation in the greater Dublin area currently estimated at in excess of €200,000 for a single room en-suite".*
>
> *The impact on supply has been significant, with more than 10,900 units with planning permission within the university public and private student accommodation sector not having been activated.*
>
> *Eurostudent Survey data from 2022 showed 45 per cent of Irish higher education students living with their parents, 19 per cent in purpose-built student accommodation and 36 per cent living predominantly in the private rented sector."*

It is clear from the above articles that there are serious repercussions from the lack of Student Accommodation bedspaces nationally. Many of the Third Level Institutions around Ireland are experiencing students with mental health difficulties and financial pressures and students living in unsuitable conditions or forced to drop out of their course as a result of the lack of available and suitable accommodation. The proposed development providing 316 No. Student Accommodation bedspaces will contribute towards alleviating the current Student Accommodation crisis currently being experienced in Ireland.

Key Point: As demonstrated in Section 1.5 of this Report, all of the Student Accommodation sites that Summix have secured permission for have all been built out, demonstrating their bona fides in implementing their planning permissions. After more than 20 No. years of vacancy, ensuring the protection of Independent House is a critical consideration and Summix can ensure the restoration of re-use of this important building range with the proposed development.

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

3.1.1.1 Cushman & Wakefield – Ireland Student Accommodation Q3 2022

Cushman & Wakefield produced a report entitled *'Ireland Student Accommodation Review 2024'*[9] that deals with the Purpose-Built Student Accommodation market in Dublin. The demand for

[8] https://www.irishtimes.com/ireland/education/2024/09/16/student-accommodation-crisis-three-applications-for- every-bed-on-campus/

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

Student Accommodation is increasing drastically as the report estimates that total full time student numbers are set to increase significantly over the next decade:

> *"Overall, we see total full time student numbers peaking at almost 240,000 over the next decade – resulting in growth of over 30,000 students over this period".*

The report estimates the number of student bedspaces required over the next decade to meet the growing and existing backlogged demand:

> "*We estimate that this rise in full time student numbers alone will translate into an increase in student demand of almost 17,000 beds over the next decade. However,* ***in reality significantly higher bed numbers than this will be required over this time horizon in order to also alleviate existing supply/demand imbalances which have spilled over into the private rented sector.*** *To quantify this supply/demand imbalance, by 2034/35 we estimate that total national demand pool for student accommodation could reach over 115,000 beds compared to current supply of only approximately 47,000."* **[Our Emphasis]**

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

> "*Overall supply across the purpose-built student accommodation segment has changed little over the past year unfortunately, in contrast with the continued growth in demand. We estimate that the overall stock of public and private beds has only grown by approximately 1,300 beds over the past year, a growth rate of only around 3%.* [.....] *The near-term supply outlook also appears insufficient compared to growing student demand nationally. We estimate that at present only approximately 1,300 beds are under construction*"

Overall, the Cushman & Wakefield report highlights the extensive pressure students attending Higher Education Institutions are facing when it comes to finding Purpose-Built Student Accommodation. The struggle students face is down to the lack of submitted, approved or built-out pre-planning and planning applications for Student Accommodation.

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

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

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

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

The *National Student Accommodation Strategy*, as discussed in detail in Section 6.5 below, identifies a requirement for at least 42,375 No. purpose-built student accommodation bedspaces in Dublin by 2024 to address the demand. However, as detailed in the EY Report, further analysis of the student population in Dublin suggests that the situation is actually even more grave:

> *"With low levels of rental opportunities in the Dublin market, and any improvement in supply in the coming years coming off a considerably low base, there is a requirement for alternative accommodation to be provided to cater for a growing student population. With projections of 42,375 students potentially requiring accommodation in Dublin in the next five years and a projected PBSA supply of 28,806 bed spaces by around 2023/24, including 14,000 bed spaces in the city centre based on the current pipeline, the evidence we have to date is it will be difficult for the PRS (standard housing) alone to meet this unmet demand of 13,569 bed spaces."*

The EY Report explores the positive impacts of Student Accommodation in the City Centre, noting in particular that PBSA in Dublin City Centre has played a positive key role in redeveloping and regenerating the inner city, stating:

> *"Two recent PBSA schemes in the Liberties have incorporated the restoration and reuse of historic buildings:*
>
> - *The New Mill Student Accommodation on Mill Street included the renovation and reuse of the three storey protected structure and adjoining former mission hall at No. 10 Mill Street.*
> - *The Highlight Student Accommodation scheme on Thomas Street provided the refurbishment and reuse of six historic buildings fronting onto Thomas Street, including the former Frawleys department store.*
>
> *Initiatives at development and operational stage of the PBSA are also highlighting the historical importance of their localities. At The New Mill Student Accommodation on Mill Street, historic map signage and a rescued stone mill wheel are erected in public areas, and in the Liberties local historians have given tours of the local streets in a "Meet the Shopkeepers" Tour."*

The EY Report concluded that:

> *"**At a national and city level a significant unmet requirement for PBSA, particularly in the city centre close to third-level institutions, was identified.***
>
> *These **previously vacant sites in highly accessible locations were well suited for use by students attending a range of third-level institutions in the vicinity**, and the combination of the significant demand for PBSA and availability of appropriate undeveloped sites have resulted in developers now providing such PBSA. It is clear from available evidence, including the National Student Accommodation Strategy 2017, that such student demand will remain in the medium term until such time as supply of PBSA can meet demand. It would then be expected that the focus of developers generally will shift to alternative sectors, including private owner-occupier and build-to-rent residential development.*
>
> ***The PBSA sector is a necessary component of the residential stock of the city and it is apparent from the study undertaken that such PBSA has not forced out private***

residential development *in instances where the sites were already vacant and underutilised for a considerable number of years."* **[Our Emphasis]**

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

3.2 Suitability for the Proposed Student Accommodation Development

The subject site is zoned 'Z5' in the *Dublin City Development Plan 2022-2028* where the stated objective is "*To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity*".

Student Accommodation is listed as a 'Permissible Use' for the zoning of the site. In this regard, the subject scheme proposes 316 No. bedspaces which will contribute positively towards addressing the present critical shortage in Student Accommodation supply and should free up private rented accommodation currently being utilised by students.

The proposed development will make use of Independent House that is currently vacant and highly underutilised. Given the site's location within the city centre, being within walking distance of an array of Third-Level Education Institutions and its proximity to various public transport links such as the Red and Green Line Luas stops, it presents an excellent opportunity to provide much needed and sustainably located PBSA.

The *Social Infrastructure Audit* prepared by Turley and submitted herewith identifies the number of 'third-level and adult education institutions' that are located within a 2-kilometre radius of the subject site. The Audit found 13 No. institutions within 750-metres of the subject site, a further 10 No. within 1-kilomtres and a further 18 No. within 2-kilometres, bringing the total of 'third-level and adult education institutions' within a 2-kilometre radius of the subject site to 41 No. institutions.

Not only is the site within a reasonable walking or cycling distance of a range of Third-Level Education Institutions, the sites proximity to services, amenities, employment opportunities, as well as multiple modes of public transport, is unmatched, being located within the heart of the City Centre. Please refer to the *Social Infrastructure Audit* prepared by Turley for more information on nearby Third-Level Education Institutions and community and social facilities.

In order to activate the street, the scheme also provides a number of retail units and a café/restaurant at ground floor to provide animation onto Middle Abbey Street, Prince's Street North and William's Lane. The proposed cultural/community space within the Printing Hall, which is to be partly retained and restored as part of the proposed development, will also increase activity along Prince's Street North, where the entrance to the space will be located.

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

The subject site is considered an ideal location for a Purpose-Built Student Accommodation building for a number of reasons:

- The site is located within 100-400-metres of the Jervis, Abbey Street, O'Connell Street and Marlborough Street Luas stops, as well as numerous bus stops, providing direct access for students with excellent public transport throughout a number of locations in Dublin.

- The accommodation's location would mostly suit students in Trinity College and TUD Grangegorman / Bolton Street campuses, which are proximate to the subject site.

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

- There is not an overconcentration of Student Accommodation facilities around this area, as demonstrated in Section 8.2.1 below. Thus, the proposal will provide a mix of residential typologies and a diverse population into this new area, key for creating new organic communities.

4.0 PLANNING HISTORY

4.1 Overview of Planning History of Subject Site

According to the Dublin City Council Online Planning Database, there has been one planning application of reference lodged at the subject site, details of which are provided below.

4.1.1 DCC Reg. Ref. 5170/06 – Middle Abbey Street Redevelopment

DCC Reg. Ref.	**5170/06**
Location:	Arnotts, site bounded to the north by Proby's Lane, Henry Street, the rear of Nos. 16-25 Henry Street, The GPO Arcade and the GPO, to the south by Middle Abbey Street and the rear of Nos. 78-84 Middle Abbey Street, Dublin 1
Applicant:	Arnotts Properties Limited
Application Date:	21st September 2006
Development Description:	The development will consist of the demolition of the majority of the existing buildings on site (c. 49,470sq.m) with the retention and refurbishment of most of Penny's (6,944sq.m) and part of Arnott's Department Store (8,359sq.m) and the retention and conversion of No's 87-90 Middle Abbey Street, Independent House, (a protected structure - 1,682sq.m). The current proposal intends to retain the facade of 94-96 Middle Abbey Street (a protected structure) and the removal of the remainder of the building including the concrete flat roof and chimney. The proposed development would also retain the majority of the facade of No's 91-109 Middle Abbey Street and No's 7-10 Upper Liffey Street (and its Proby's Lane frontage) in addition to part retention and part reconstruction of the facade No's 7-15 Henry Street (Protected Structure) in order to facilitate creation of a new retail street, linking Prince's Street North with Henry Street. The Proposed development is laid out as four main blocks (referred to as Blocks A, B, C & D), set around a new urban street layout comprising an extension of Prince's Street North to connect to Henry Street, the realignment of Williams Lane and the creation of a new external pedestrian link (Abbey Lane) from Prince's Street North to Middle Abbey Street (resulting in the demolition of part of the facade of No 102 Middle Abbey Street). The proposed blocks range in height from 3 storeys to 12 storeys (generally 6 to 8 storeys in height), comprising retail and residential in Blocks A, B, C & D and retail and a hotel and associated facilities in Block C.
DCC Decision:	Grant Permission
DCC Decision Date:	6th July 2007
ABP Ref.:	PL29N.224640
ABP Decision:	Grant Permission
Final Grant:	25th July 2008

Planning permission was Granted in July 2008 for a mixed-use retail and residential scheme measuring c. 38,000 sq m which principally proposed heights of 7 No. and 8 No. storeys with a 12 No. storey element (Reg. Ref. 5170/06). This application was in respect of a larger landholding which included the subject site as well as the adjoining Arnotts and Penney's sites, see Figure 4.1.

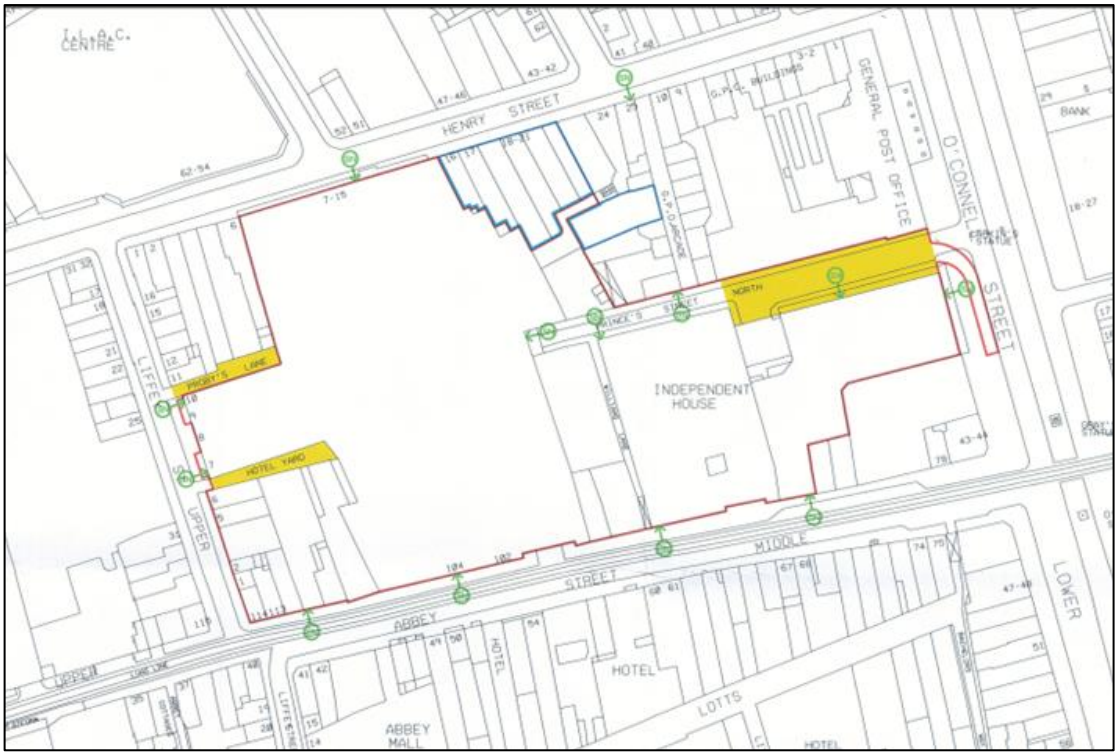


Figure 4.1: Full Redevelopment Site including Independent House

(Source: Dublin City Council Online Planning Register Reference: 5170/06)

This permitted development included the demolition of the buildings to the rear of Independent House.

The Independent House site formed part of Blocks C and D. Block D, which was located closest to the GPO, ranged in height from 3 storeys to 8 storeys (plus a lift overrun located at roof level (9 storey equivalent) 30.19m in height overall) above street level (Figure 4.2). The 8 No. storey element was sited to the rear of Independent House, and this was considered to be acceptable to the Planning Authority.

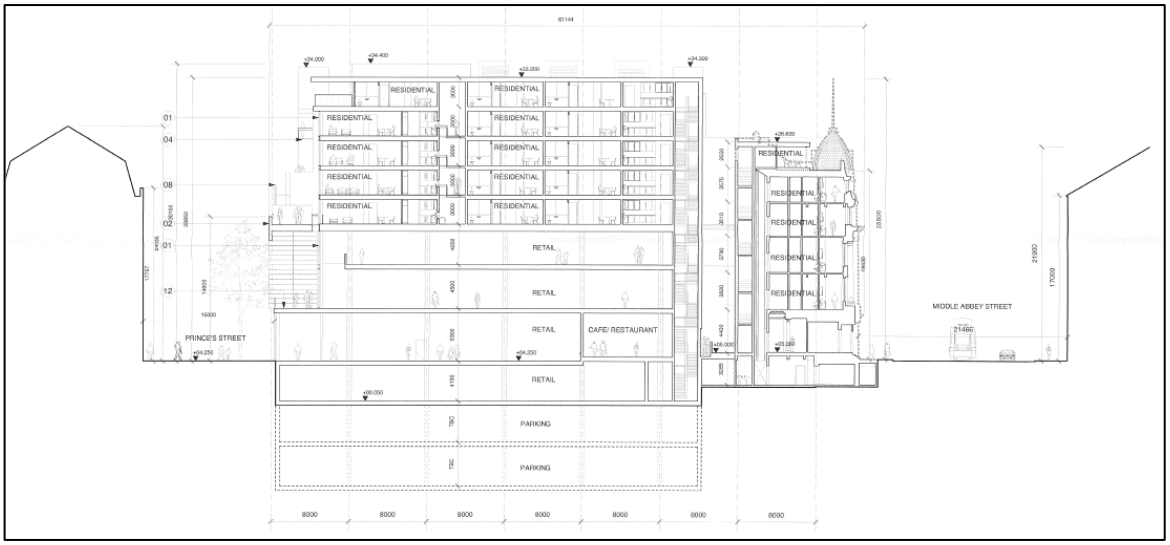


Figure 4.2: Cross Section showing Rear Extension to Independent House Permitted Under DCC Reg. Ref. 5170/06

(Source: Dublin City Council Online Planning Register Reference: 5170/06)

Further to a request for additional information in respect of the conservation status of Independent House, the Conservation Officer stated the following as extracted from the Planning Officer's Report:

> In a report dated the 18th of June 2007 the City Conservation Officer has written a response on foot of the further information received.
>
> In this regard the City Conservation Officer states that *"87-90 Middle Abbey Street, a Protected Structure (Independent House), have been inspected and the interiors are of insufficient architectural merit to warrant concern regarding the proposals".*

Having regard to the significant passage of time (some 18 No. years) and the further significant degradation of the building, it is expected that the same conclusion should be reached.

This 2006 application was granted permission in July 2008 further to an Appeal to An Bord Pleanála, but it was never implemented.

An amendment application was later Granted Permission in 2009 (Reg. Ref. 4765/08), however, neither permission was implemented, and they have now lapsed.

4.2 Relevant Planning History of Adjacent Arnotts Site

The following sets out the key planning history on the adjacent Arnotts site which includes recent separate applications for a Hotel and a Build-To-Rent Residential Development. The red-line boundary of the Arnott's site is set out in Figure 4.3 below with Independent House directly adjacent to the east, on the opposite side of William's Lane.

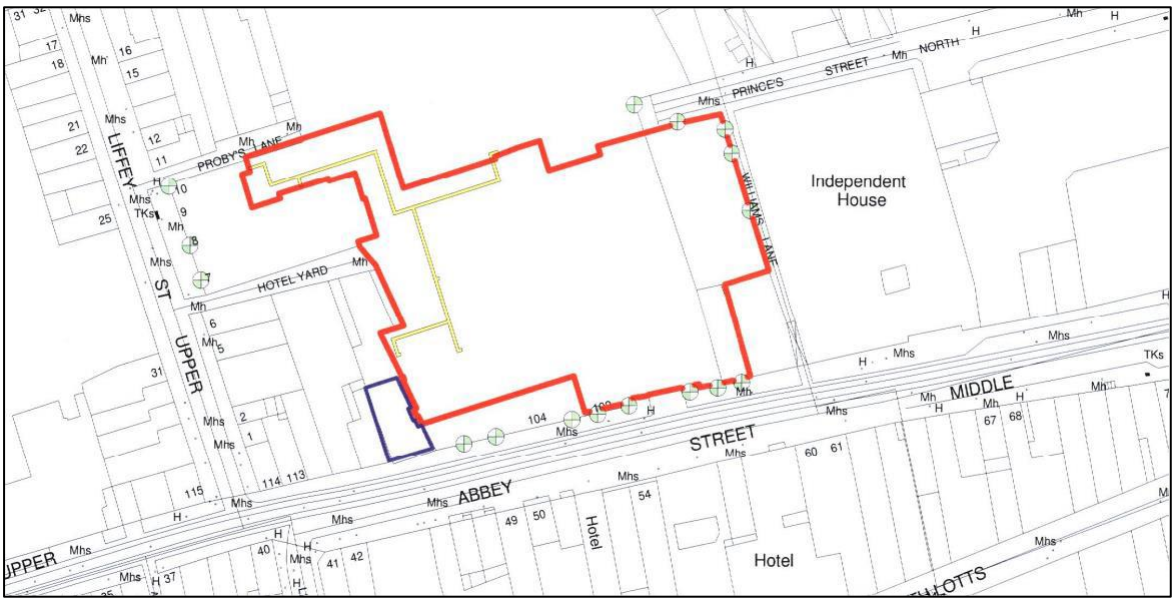


Figure 4.3: Red-Line Boundary of Adjacent Arnotts Site with Independent House located to the east

(Source: Dublin City Council Online Planning Register References: 4880/22 and 3040/22)

4.2.1 DCC Reg. Ref. 4880/22 - Hotel Application at Arnott's

DCC Reg. Ref.	4880/22
Location:	97 Middle Abbey St & 16/17 Prince's Street North, 19/25 Prince's Street North & 98-101 Middle Abbey Street & 102-107 Middle Abbey Steet & 2-3, 4 & 4A Proby's Lane & 7/7A and 8 Liffey Street Upper, Dublin 1.
Applicant:	Fitzwilliam Real Estate Developments Ltd
Application Date:	19th September 2022
Development Description:	The proposed development will consist of a hotel development consisting of the: demolition of the existing 3 No. storey Eircom structure to the rear of No. 97 Middle Abbey Street (c. 2,201 sq m), rooftop stairwell enclosures (c.128 sq m) and of the existing rear extensions No. 97 Middle Abbey Street (second and third floor levels) (c. 11sq m) decommissioning and demolition of the top three open-air levels of the Arnotts' car park (resulting in the removal of 145 no. car parking spaces, with 225 no. car parking spaces remaining); development of a 9 no. storey (with setbacks) over basement element fronting William's Lane, a 3 no. storey (with setbacks) element above Arnotts' car park and 2 no. storey (with setback) element above Arnotts store, to provide hotel (254 no. bedrooms and related ancillary hotel facilities and restaurant uses (including reception area, lobby, public bar, restaurant, cold room, storage areas, administration and staff facilities, plant, refuse area and bicycle parking area) with a total new build gross floor of c. 10,689 sq m (including c. 632 sq m basement, and ESB substation with switchrooms); and the change of use (from basement to fourth floor levels to hotel), refurbishment (internal and external alterations) and extension (to link with the new build hotel in the rear) of No. 97 Middle Abbey Street (total floor area of c. 404 sq m (including c. 124 sq m basement); the continued use of the Arnotts' car park stairs (ground, first, second and their floor levels) and Arnotts' store stairs (ground, first, second, third, fourth and fifth floor levels) (c. 205 sq m and c.142 sq m respectively); associated lighting, pedestrian access via no. 97 Middle Abbey Street and William's Lane; sustainable urban drainage systems (including green roofs and attenuation tanks; associated site servicing (foul and surface water drainage and water supply); associated hard and soft landscaping and all other associated site excavation, infrastructural and site development works above and below ground including changes in level, boundary treatments and associated site servicing (foul and surface water drainage and water supply). The total gross floor area of the overall development is c. 11,440 sq m. The development will also consist of: the erection of no. side-lit signs, 1 no. on the south elevation (entrance to no. 97 Middle Abbey Street) and 1 no. on the east elevation (William's Lane) measuring c.0 49 sq m each.
DCC Decision:	Grant Permission
DCC Decision Date:	22nd May 2023
Final Grant:	30th June 2023

Dublin City Council decided to Grant Permission on 30th June 2023 for a Hotel Development at the Arnotts site, measuring up to 9 No. storeys (see Figure 4.4 below). The scheme comprised the retention of the existing Arnotts Department store and construction over and around the retail unit.

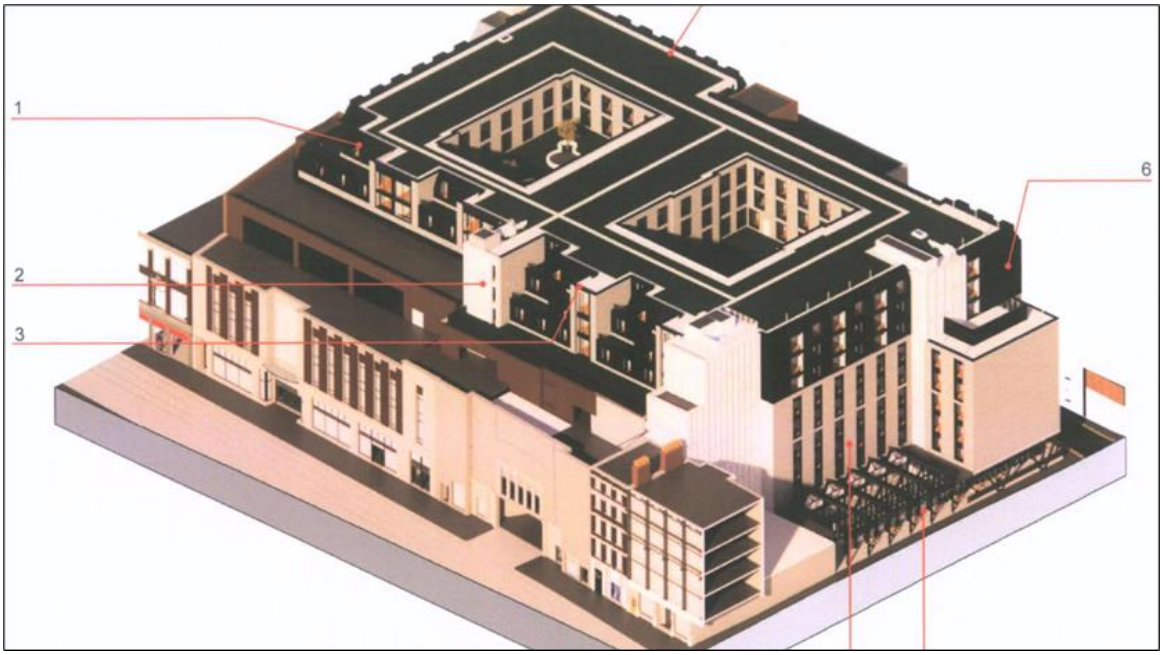


Figure 4.4: 3D Model of Permitted Hotel Development

(Source: Dublin City Council Online Planning Register Reference: 4880/22)

4.2.2 DCC Reg. Ref. 3040/22 – Arnotts Build to Rent Scheme

DCC Reg. Ref.:	**3040/22**
Location:	97 Middle Abbey St & 16/17 Prince's Street North, 19/25 Prince's Street North & 98-101 Middle Abbey Street & 102-107 Middle Abbey Steet & 2-3, 4 & 4A Proby's Lane & 7/7A and 8 Liffey Street Upper, Dublin 1.
Applicant:	Fitzwilliam Real Estate Developments Ltd
Application Date:	12th January 2022
Development Description:	A Build-To-Rent residential development6 consisting of the: demolition of the existing 3 No. storey Eircom structure to the rear of No. 97 Middle Abbey Street (c. 2,201 sq m); decommissioning and demolition of the top three open-air levels of the Arnotts' Car Park (resulting in the removal of 145 No. car parking spaces, with 225 No. car parking spaces remaining); development of a 12 No. storey over basement element fronting William's Lane, a 5 No. storey element above Arnotts' Car Park, and a 2 No. storey element above Arnotts Store, to provide 155 No. apartments (56 No. studio units; 85 No. 1-bed units; and 14 No. 2-bed units). The development will consist of the extension of the opening hours of the existing multi-storey car park ('Arnotts' Car Park) from its current operating hours of: Monday - Wednesday (07:00 - 20:00); Thursday (07:00 - 21:00); Friday - Saturday (07:00- 20:00); and Sunday (09:00 - 20:00) to the operation of the car park on a 24 hours per day, 7 days per week basis for temporary period of 5 years.
DCC Decision:	Refuse Permission
DCC Decision Date:	10th January 2023
ABP Ref.:	PL29N.315716

ABP Decision:	Split Decision (Grant Permission for extension of opening hours only and Refuse Permission for BTR element)
ABP Decision Date:	23rd November 2023

Dublin City Council initially Refused Permission for the scheme for the following reasons: (a) its excessive scale and height, which appear visually incongruous on the skyline when viewed from D'Olier Street and visually obtrusive on the streetscape when viewed from the western end of Middle Abbey Street; (b) daylight/sunlight issues; and (c) the BTR unit mix would not create a sustainable community.

It is noted that DCC invited the Applicant to reduce the height of the 5 No. storey element over the Arnott's carpark at Further Information Stage, but they did not make any changes and defended the proposal as lodged, leading to DCC refusing permission.

Further to a First Party Appeal, whilst the Inspector recommended a grant of permission, An Bord Pleanála refused permission for the following reason:

> It is considered that this element of the proposed development would, due to its excessive scale and height, appear visually incongruous on the skyline when viewed from D'Olier Street and visually obtrusive on the streetscape when viewed from the western end of Middle Abbey Street. As such, and notwithstanding the alternative design option presented to the Board at appeal, the proposed development would seriously injure the historic character of the City and would be contrary to policies SC22, as it relates to Historical Architectural Character, and BHA7, as it relates to Architectural Conservation Areas, of the Dublin City Development Plan 2022-2028. These policies aim to facilitate new development in harmony with the City's historical spaces and structures and to ensure that new development or alteration of a building immediately adjoining an Architectural Conservation Area, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the Architectural Conservation Area. This element of the proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

4.3 Other Relevant Developments

4.3.1 DCC Reg. Ref 3697/17 - Hotel Development at Corner of Middle Abbey Street and Liffey Street Upper

Planning permission was granted in July 2018 under DCC Reg. Ref. 3697/17 for an 8 No. storey (including setbacks) over basement Hotel and retail development on the corner of Middle Abbey Street and Liffey Street, c. 110 metres west of the subject site. As illustrated in Figure 4.5 below, this Hotel has since been constructed and is now operating as Motel One.



Figure 4.5: Middle Abbey Street Elevation of Recently Opened Motel One

(Source: Booking.com)

4.3.2 DCC Reg. Ref 3804/19 / ABP Ref. PL29N.305853 - Hostel Development Upper Abbey Street

In March 2020, planning permission was granted under DCC Reg. Ref 3804/19 / ABP Ref. PL29N.305853 for modifications to a previously permitted development (DCC Reg. Ref. 2971/17/ABP Ref. PL29N.249037, DCC Reg. Ref. 2954/18) at Nos. 35-36 Abbey Street Upper, c. 170 metres west of the subject site. The development permitted was for a hostel development of up to 11 No. storeys over 2 No. basement levels. The hostel is now operational and is known as Clink I Lar (Figure 4.6).

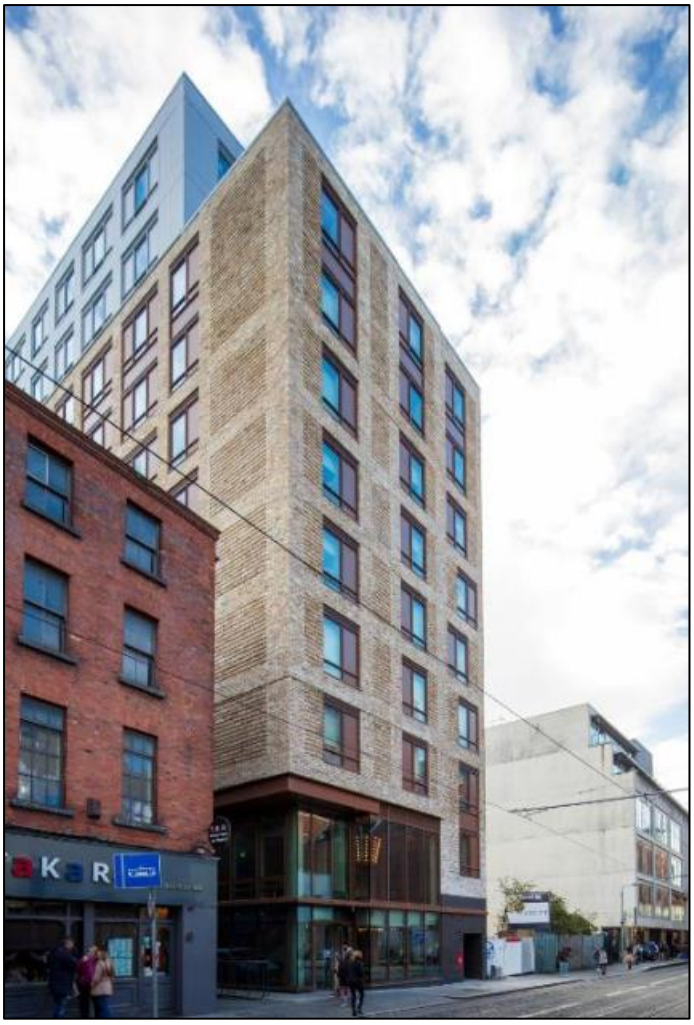


Figure 4.6: Clink I Lar on Upper Abbey Street

(Source: Booking.com)

4.3.3 DCC Reg. Ref. 4009/22 / ABP Ref. PL29N.314298 - Mixed-Use Development on Upper Abbey Street

On 27th October 2023, An Bord Pleanála Granted Permission for the construction of an 11-storey (with 9th and 10th floors set back) over shared basement hotel building fronting Abbey Street (comprising 252 No. bedrooms and ancillary hotel facilities) and a 10-storey (with 7th and 9th floors set back) over shared basement aparthotel block fronting Great Strand Street (comprising 222 No. bedrooms and ancillary aparthotel facilities), together with 2 No. retail units at ground floor level on a site adjacent to the Clink I Lar site.

4.3.4 DCC Reg. Ref. 2479/20 - Jervis Shopping Centre Extension

Planning permission was granted in January 2021 for: the addition of 24 No. Build to Rent residential units located at car park levels 3 and 4 on the Jervis Street and Abbey Street Upper frontages of the building and demolition of existing retail floor area, storage and car parking area and construct a 6-storey building behind the Mary Street frontage, from first floor to car park level 5 for use as a Co-Living Development with 127 No. units as well as additional office floorspace.

4.4 Planning History Summary

It is clear from the above, that Abbey Street is undergoing an urban revival after a number of years of decline. Prominent sites have sought redevelopment either in whole or in part and in doing so, increased densities and heights have been considered to be acceptable by both Dublin City Council and An Bord Pleanála.

5.0 DETAILS OF THE DEVELOPMENT

5.1 Description of Development

The proposed development, as stated in the Statutory Notices, is as follows:

> *"Summix IHD Developments Limited intend to apply to Dublin City Council for a permission for a Large-Scale Residential Development principally comprising Student Accommodation at a c. 0.3 Ha site at Nos. 87-93 Middle Abbey Street, Dublin 1, D01 NH70 (known collectively as 'Independent House'). The site is generally bound by Prince's Street North to the north, William's Lane and Nos. 94-96 Middle Abbey Street to the west, Middle Abbey Street to the south, and Nos. 35-39 O'Connell Street Lower (known as 'Penneys') to the east. The site comprises 6 No. interconnecting, long-standing vacant structures as follows: (a) a principally part 5 No. to part 6 No. storey above basement level building fronting Middle Abbey Street, known as Independent House, with a single storey workshop building to the rear; (b) a 5 No. storey (above basement level) building at the corner of Middle Abbey Street and William's Lane, known as Emerald Chambers; (c) a triple height (at basement level) structure towards the centre of the site, known as the 'Printing Hall'; (d) a 2 No. storey (above basement level) warehouse and office fronting William's Lane; (e) a part 3 No. to part 4 No. storey (above basement level) loading bay and office fronting Prince's Street North; and (f) a 3 No. storey (above basement level) office in the eastern portion of the site, bounded by Penneys. The site includes 2 No. Protected Structures (RPS Ref. Nos. 18 & 8797).*
>
> *The development's surface water and foul water drainage network shall discharge from the site into the existing combined sewer located along Prince's Street North to the north-west of the site. A new pedestrian crossing and upgrade works to the footpath and kerb along Prince's Street North are proposed. Public realm improvements are also proposed to William's Lane. The development site area, drainage works, road works and public realm improvements will provide a total application site area of c. 0.33 Ha.*
>
> *The development will principally consist of: the retention and refurbishment of part of the building façade along Prince's Street North; the demolition of the 3 No. former warehouses and offices (c. 5,270 sq m) and the lowering of part of the basement level thereat; the demolition of part of the adjoining wall to the north-east of the site, bounding the Penneys loading bay; the partial demolition of the Printing Hall (c. 457 sq m) and the rear of Emerald Chambers (c. 150 sq m) and Independent House (c. 100 sq m); the removal of the existing concrete roof slab at Emerald Chambers to facilitate an increase in floor-to-ceiling height at fourth floor level; the lowering of part of the ground floor level in Independent House and Emerald Chambers for universal access; refurbishment works to the Protected Structures including general internal and external works for conservation repairs, maintenance, change of use and upgrading of the buildings; and the construction of a part 1 No. to part 9 No. storey over basement building connecting into the retained structures and principally comprising 316 No. Student Accommodation bedspaces (267 No. standard rooms, 5 No. accessible rooms, 2 No. twin studios (4 No. bedspaces), 10 No. accessible studios and 30 No. single studios) with associated facilities, which will be utilised for short-term let during student holiday periods. The 272 No. standard and accessible rooms are provided in 42 No. clusters ranging in size from 5 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.*

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (c. 644 sq m); 3 No. retail units (c. 216 sq m); a café/restaurant (c. 254 sq m); bicycle stores at basement and ground floor levels; visitor cycle parking spaces; bin stores; ESB substation; hard and soft landscaping; green/blue roofs; new telecommunications infrastructure at roof level, together with all associated equipment; boundary treatments; PV panels; plant; lift overruns; and all associated works above and below ground. The gross floor area of the development is c. 15,413 sq m comprising c. 12,751 sq m above basement level."



Figure 5.1: **CGI of the Proposed Development at the Junction of Prince's Street North and William's Lane, Including the Permitted Arnotts Hotel Development to the West of the Site (Right in the Above CGI)**

(Source: ***Aerials, CGIs and Verified Views*** **by 3D Design Bureau, 2025)**

5.2 Key Statistics

Site Area (Red Line)	0.33 Ha (c. 3,325 sq m)
Main Development Site	0.3 Ha (c. 2,995.26 sq m)
Existing Floor Area	9,627 sq m
Existing Site Coverage	96.35%
Existing Height	Interconnected structures ranging between part 1 No. to part 6 No. storeys above basement level
Demolition Floor Area	5,977 sq m
Retained Floor Area	3,650 sq m

Proposed New Floor Area	11,763 sq m	
Total Floor Area (Retained + Proposed New Build)	15,413 sq m (12,751 sq m above basement level)	
Proposed Site Coverage	91.81%	
Plot Ratio	4.26	
Building Height	Part 1 No. to Part 9 No. storeys above basement level	
Student Accommodation	316 No. bedspaces	
Student Amenity Space	1,834 sq m	Internal: 1,211 sq m
		External: 623 sq m
Retail Floor Area	216 sq m	
Café/Restaurant Floor Area	254 sq m	
Cultural/Community Floor Area	644 sq m	
Bicycle Spaces	408 No. spaces	330 No. long-term spaces
		78 No. short-term spaces

Table 5.1: Key Statistics of the Proposed Development

(Source: Design Proposal by Henry J Lyons, Table Generated by Thornton O'Connor Town Planning, 2025)

5.3 Design & Layout

5.3.1 Demolition & Retention

The gross floor area of the existing structures on site equates to 9,627 sq m. As part of the subject development, it is proposed to demolish a total of 5,977 sq m of floor space. This will include the demolition of the 3 No. former warehouses, loading bay and offices to the rear of Emerald Chambers and Independent House (c. 5,270 sq m); the partial demolition of the Printing Hall (c. 457 sq m) and the rear of Emerald Chambers (c. 150 sq m) and Independent House (c. 100 sq m).

Please refer to the table below for the schedule of floor area to be demolished and in what location/building on site:

	Independent House	Emerald Chambers	Printing Hall	Warehouses, Loading Bay & Offices	Total
Basement	0 sq m	75 sq m	350 sq m	1,256 sq m	**1,690 sq m**
Ground Floor	0 sq m	75 sq m	107 sq m	1,350 sq m	**1,532 sq m**
First Floor	25 sq m	0 sq m	0 sq m	1,460 sq m	**1,485 sq m**
Second Floor	25 sq m	0 sq m	0 sq m	1,060 sq m	**1,085 sq m**
Third Floor	25 sq m	0 sq m	0 sq m	135 sq m	**160 sq m**
Fourth Floor	25 sq m	0 sq m	0 sq m	0 sq m	**25 sq m**
Total	**100 sq m**	**150 sq m**	**457 sq m**	**5,270 sq m**	**5,977 sq m**

Table 5.2: Schedule of Floor Area to be Demolished

(Source: Details Provided by Henry J Lyons and Table Generated by Thornton O'Connor Town Planning, 2025)

The proposed development seeks to retain 3,650 sq m of floor space, which primarily includes Emerald Chambers, Independent House and the eastern part of the Printing Hall. Refurbishment works to the retained structures include general internal and external works for conservation repairs, maintenance, change of use and upgrading of the structures. The 3 No. storey façade with 5-bay windows along Prince's Street North is also proposed to be partly retained and incorporated into the new building on site.

Figure 5.2 illustrates what areas are intended to be retained and what is proposed as part of the subject development at ground floor level.



Figure 5.2: Ground Floor Plan of Areas Intended for Retention and Proposed New Development

(Source: *Architectural Design Statement* by Henry J Lyons, 2025)

Some floor levels are proposed to be altered to ensure sufficient floor-to-ceiling height and insultation are provided. This includes the raising of the concrete roof at Emerald Chambers by c. 245 mm to provide sufficient floor-to-ceiling height at the fourth floor, which is currently only c. 2.3 metres. The entire basement floor slab is also proposed to be removed, reinstated and

upgraded to ensure insulation and damp proof and radon gas membranes are included, and as part of these upgrade works, the floor level will also change in some places to ensure sufficient floor-to-ceiling height is provided.

Please refer to the *Architectural Heritage Impact Assessment*, the *Architectural Design Statement* and the architectural drawings submitted herewith for a full description of the demolition, retention and construction works proposed as part of this development.

5.3.2 Student Accommodation

5.3.2.1 Access & Layout

The proposed development will provide 316 No. student bedspaces across first floor to seventh floor level of the building. Students will be able to access their floor through numerous lifts and staircases at suitably located areas throughout each of the 3 No. cores: Core A, Core B and Core C.

Core A is within the northern and part of the western extent of the building and will be located only metres off Prince's Street North for safe and direct access to the lift and stairs for students. Core A will provide access to 25 No. clusters and 19 No. single occupancy studios, totalling 173 No. bedspaces.

Core B covers Emerald Chambers and part of the western extent of the building whereby students can directly access the stairs and lift for the core via an entrance door along the southern extent of William's Lane. Core B will provide access to 11 No. clusters comprising 76 No. bedspaces. There is an existing metal cage lift shaft and staircase within Core B which is proposed to be retained and refurbished as part of the conservation proposal. Whilst the stairs will act as a secondary means of access, it is intended that the lift shaft is to be refurbished for decorative purposes only and will not be operational. As discussed in the *Architectural Design Statement*, the feasibility of upgrading the lift shaft to meet current building regulations was explored by the Design Team; it was concluded that it would not be viable due to the considerable alteration required which would ultimately detract from its special architectural character.

Core C provides access to the student bedspaces within Independent House and the eastern extent of the building. Students will be able to access the stairs and lift for the core via the main entrance to the building along Middle Abbey Street. Core C will provide access to 7 No. clusters, 21 No. single occupancy studios and 2 No. twin occupancy studios, totalling 67 No. bedspaces. There is an existing lift shaft and staircase within Core C; however, unlike the existing one in Core B, the lift shaft in Core C was a later addition inserted into the stairwell and is not of architectural heritage merit. Therefore, it is proposed to retain and refurbish the staircase only and remove this non-original lift shaft. The refurbished staircase will provide a secondary means of access for Core C.

The main entrance to the Student Accommodation is located along Middle Abbey Street and provides access to the student reception/concierge and various student amenity spaces, as well as a secondary means of access to Cores A & B. Please refer to Section 5.3.1.3 for more details on the communal amenity space accessed via the main entrance to the accommodation.

The location of the 3 No. Cores and the secondary access in Cores B & C are identified in Figure 5.3 overleaf.

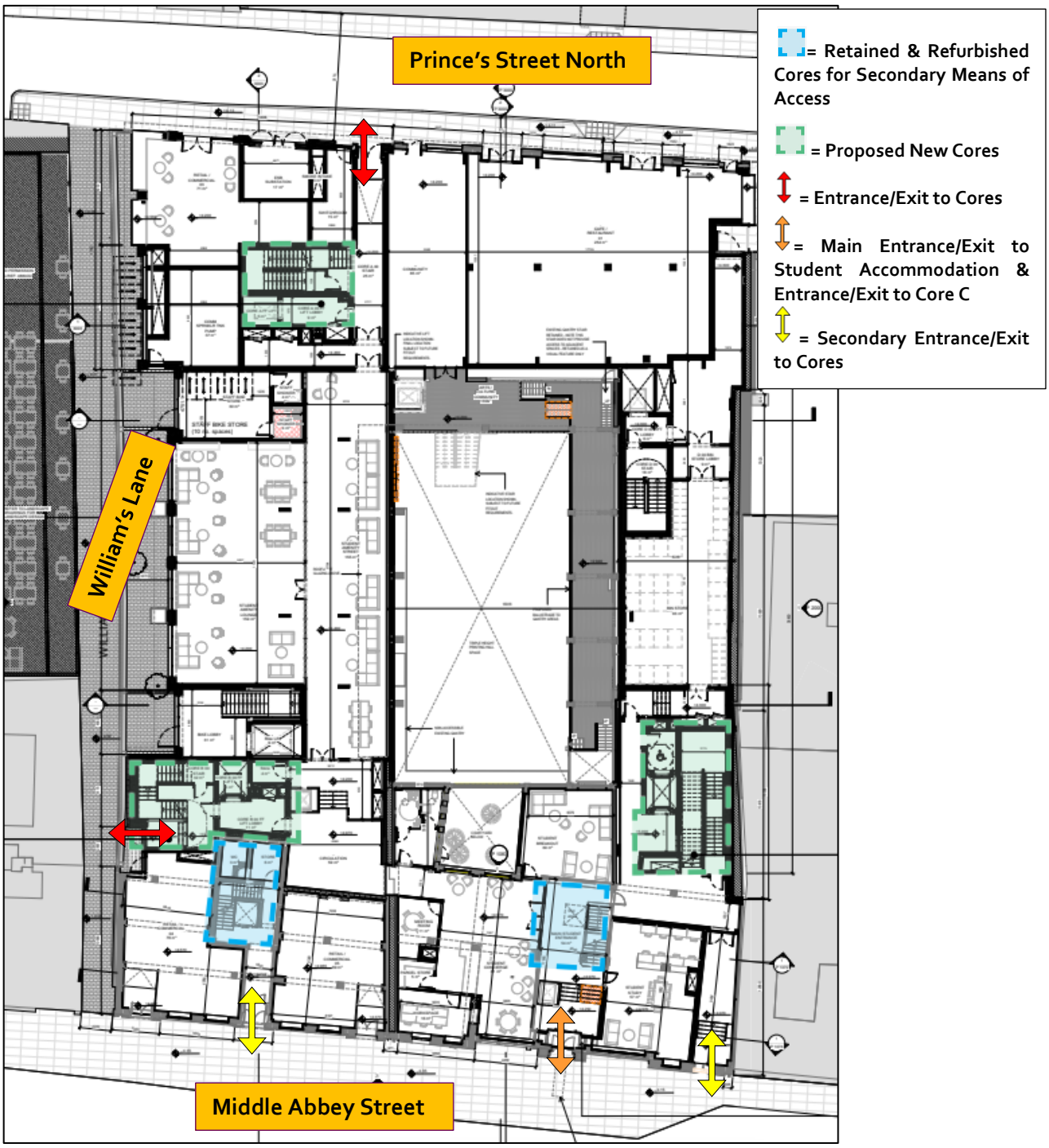


Figure 5.3: **Access Arrangements & Location of Cores for the Proposed Student Accommodation**

(Source: ***Architectural Design Statement*** **by Henry J Lyons, Annotated by Thornton O'Connor Town Planning, 2025)**

5.3.2.2 Clusters & Studios

The Student Accommodation will provide 267 No. standard rooms, 5 No. accessible rooms, 30 No. single occupancy studios, 10 No. accessible studios and 2 No. twin occupancy studios. The proposed cluster type will range is 5 No. students to 8 No. students per cluster (excluding 7 No. student clusters) and varies per floor level, as illustrated in Figure 5.4.

A typical standard room measures 12.8 sq m and will include individual en-suites, an accessible room typically measures 25.4 sq m, single studios typically measure 25 sqm, twin studios typically measure 34.4 sq m and accessible studios typically measure 30 sq m. Each cluster will provide a minimum of 4 sq m per bedspace of kitchen / living space, i.e. a 6 No. person cluster will be provided with a kitchen / living area measuring a minimum of 24 sq m.

CLUSTER & STUDIO AREA SCHEDULE

FLOOR	Cluster Name	GFA (m2)	Capacity (person)
BASEMENT			
GROUND			
FIRST	A 0101	151	6
	A 0102	32	1
	A 0103	142	6
	A 0104	131	5
	A 0105	30	1
	A 0106	167	8
	A 0107	26	1
	B 0101	168	8
	B 0102	131	5
	C 0101	134	6
	C 0102	25	1
	C 0103	27	1
	C 0104	26	1
	C 0105	26	1
	C 0106	25	1
	C 0107	25	1
SECOND	A 0201	150	6
	A 0202	32	1
	A 0203	142	6
	A 0204	130	5
	A 0205	30	1
	A 0206	167	8
	A 0207	25	1
	B 0201	168	8
	B 0202	133	5
	C 0201	134	6
	C 0202	25	1
	C 0203	26	1
	C 0204	25	1
	C 0205	25	1
	C 0206	25	1
	C 0207	26	1
	C 0208	36	2
THIRD	A 0301	151	6
	A 0302	32	1
	A 0303	142	6
	A 0304	131	5
	A 0305	30	1
	A 0306	168	8
	A 0307	25	1
	B 0301	168	8
	B 0302	133	5
	C 0301	134	6
	C 0302	25	1
	C 0303	27	1
	C 0304	25	1
	C 0305	26	1
	C 0306	28	1
	C 0307	25	1
	C 0308	36	2

CLUSTER & STUDIO AREA SCHEDULE

FLOOR	Cluster Name	GFA (m2)	Capacity (person)
FOURTH	A 0401	150	6
	A 0402	32	1
	A 0403	142	6
	A 0404	131	5
	A 0405	30	1
	A 0406	168	8
	A 0407	25	1
	B 0401	168	8
	B 0402	136	5
	C 0401	134	6
	C 0404	28	1
	C 0405	28	1
	C 0406	28	1
FIFTH	A 0501	150	6
	A 0502	32	1
	A 0503	142	6
	A 0504	131	5
	A 0505	30	1
	A 0506	168	8
	A 0507	25	1
	B 0501	168	8
	C 0501	134	6
SIXTH	A 0603	33	1
	A 0604	192	8
	A 0605	26	1
	A 0607	168	8
	B 0601	168	8
	C 0601	134	6
SEVENTH	A 0702	33	1
	A 0704	124	5
	A 0705	27	1
	A 0707	167	8
	B 0701	168	8
	C 0701	133	6
TOTAL	0	7424	316

Figure 5.4: Cluster & Studio Area Schedule

(Source: *Schedule of Accommodation*, Henry J Lyons, 2025)

5.3.2.3 Communal Amenity Space

The proposed development seeks to include 1,834 sq m of communal amenity space, which is 5.8 sq m of communal amenity space per bedspace. This will be provided through 1,211 sq m (66%) of internal amenity space and 623 sq m (34%) of external amenity space. The following table demonstrates the area of the amenity space and at what ground level it will be located:

Floor	Internal (sq m)	External (sq m)
Basement	377	31 sq m
Ground Floor	654	0
First Floor	36	0
Fourth Floor	93	0
Fifth Floor	0	70
Sixth Floor	0	118
Eighth Floor	51	404
Total	1,211	623
Overall Total	**1,834 sq m**	

Table 5.3: Proposed Internal and External Student Amenity Space

(Source: Henry J Lyons, 2025)

The large quantum of internal communal amenity space will provide a cinema and various lounges for students to hangout and socialise with one another, while the study room, workspace room, meeting room and breakout space will provide a quiet space for students to study outside of their bedroom and somewhere suitable for any groupwork. A gym, including a yoga studio, is also provided to promote a healthy lifestyle amongst students.

The external communal amenity space at fifth, sixth and eighth floor level will provide residents with a place to relax and socialise through multiple seating areas, a BBQ/cooking area, an outdoor cinema, and games areas. These spaces will be filled with an abundance of planting and shrubs to create an enclosure of areas, enhance the local biodiversity, and create visually pleasant spaces. It is also noted that additional external amenity space is proposed at eighth floor level; however, it is not counted towards the total quantum of amenity space provided in Table 5.2 above as it is a restricted in space, i.e. too narrow; thus, it is intended to be used as additional amenity space for students, with some outdoor seating and planting provided. The location of the external communal amenity space is located in Figure 5.5 & 5.6 with concept visuals of some of the proposed amenities provided in Figures 5.7 -5.9.

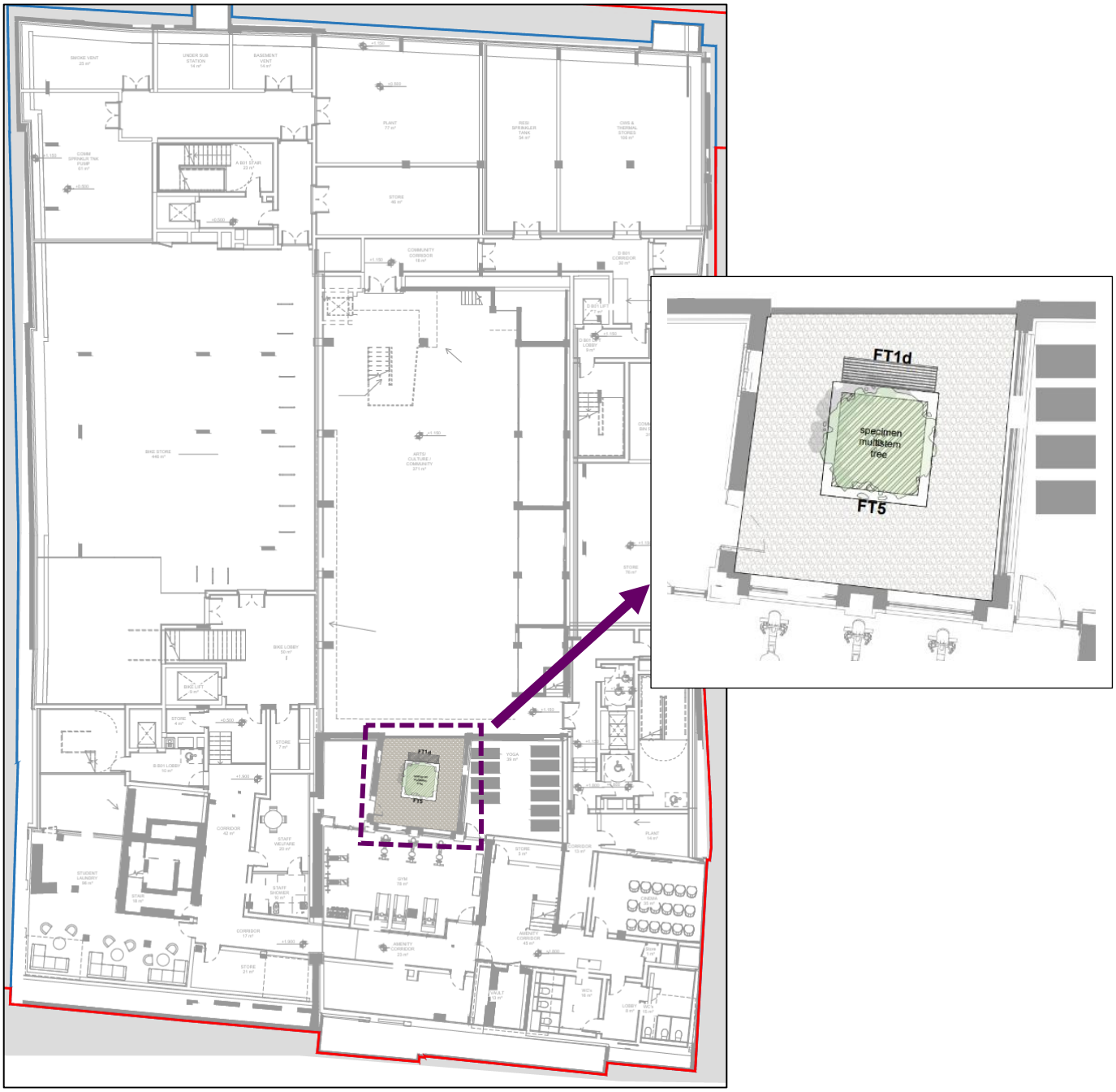


Figure 5.5: **Location & Layout of the Proposed Basement Courtyard to be Retained and Refurbished with New Landscaping for Student Amenity Space**

(Source: **Drawing No. 'C0175-GA-00-1001' by Cameo & Partners, Annotated by Thornton O'Connor Town Planning, 2025)**

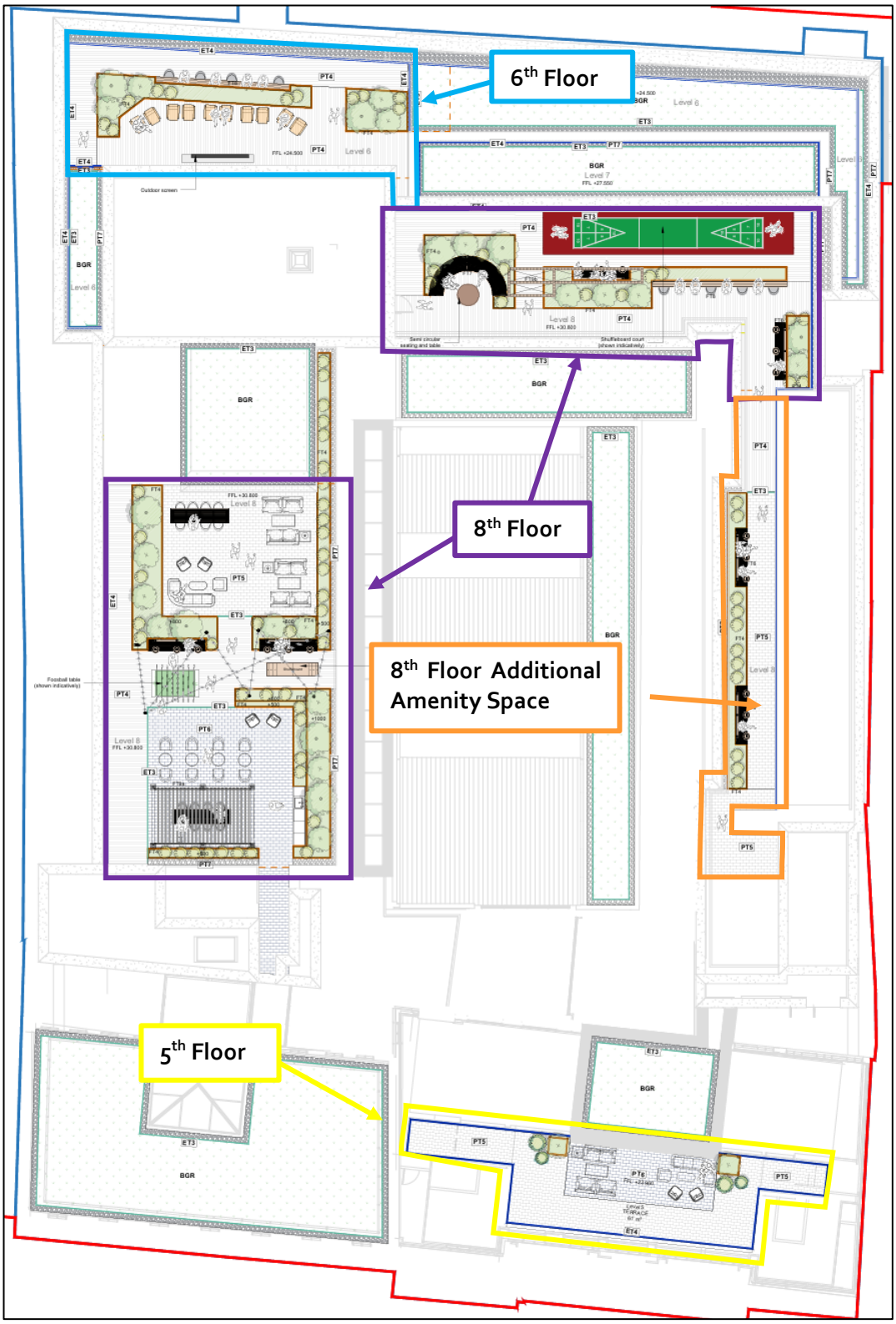


Figure 5.6: **Location of the Proposed External Communal Amenity Space at Fifth, Sixth and Eight Floor Level**

(Source: **Drawing No. 'C0175-GA-ZZ-1010' by Cameo & Partners, Annotated by Thornton O'Connor Town Planning, 2025)**



Figure 5.7: **Concept Visualisation of the Outdoor Cinema and Seating Within the Communal Amenity Terrace at Sixth Floor Level**

(Source: ***Landscape Design Access Statement*** **by Cameo & Partners, 2025)**



Figure 5.8: **Concept Visualisation of the Seating Area, Games Area and BB1/Outdoor Kitchen Within the Communal Amenity Terrace at Eighth Floor Level**

(Source: ***Landscape Design Access Statement*** **by Cameo & Partners, 2025)**



Figure 5.9: Concept Visualisation of the Seating Area and Planting Within the Communal Amenity Terrace at Eighth Floor Level

(Source: *Landscape Design Access Statement* by Cameo & Partners, 2025)

5.3.2.4 Bicycle & Bin Store

As illustrated in Figure 5.10, the bin store to cater for the Student Accommodation will be located within the eastern extent of the building at ground floor level and provides c. 115 sq m of floor space.

The proposed development will include 408 No. bicycle parking spaces, with 384 No. spaces dedicated for the Student Accommodation. There will be 320 No. spaces provided for the long-term use of students and 64 No. spaces provided for people visiting students. The 320 No. long-term spaces for the students will be located in a single bike store at basement level and will comprise 304 No. double stacked type spaces (152 No. stacks) and 8 No. Sheffield type stands (16 No. stands). E-charging facilities are also provided adjacent to the main bike store, which can facilitate the charging of 8 No. e-bikes. The bike store for the visitor parking spaces will be located adjacent to the student bike store and will comprise 64 No. double stacked spaces (32 No. stacks), as illustrated in Figure 5.10.

Residents and visitors will be able to bring their bicycles down to the basement bike stores via the bike lift located in a dedicated bike lobby only a few metres from William's Lane. The entrance to the bike lobby will be accessible for residents and staff of the Student Accommodation only and any visitors will require a resident or member of staff to grant access. Please refer to the *Bicycle Parking Management Plan* prepared by Waterman Moylan for further details of the Student Accommodation bicycle parking.

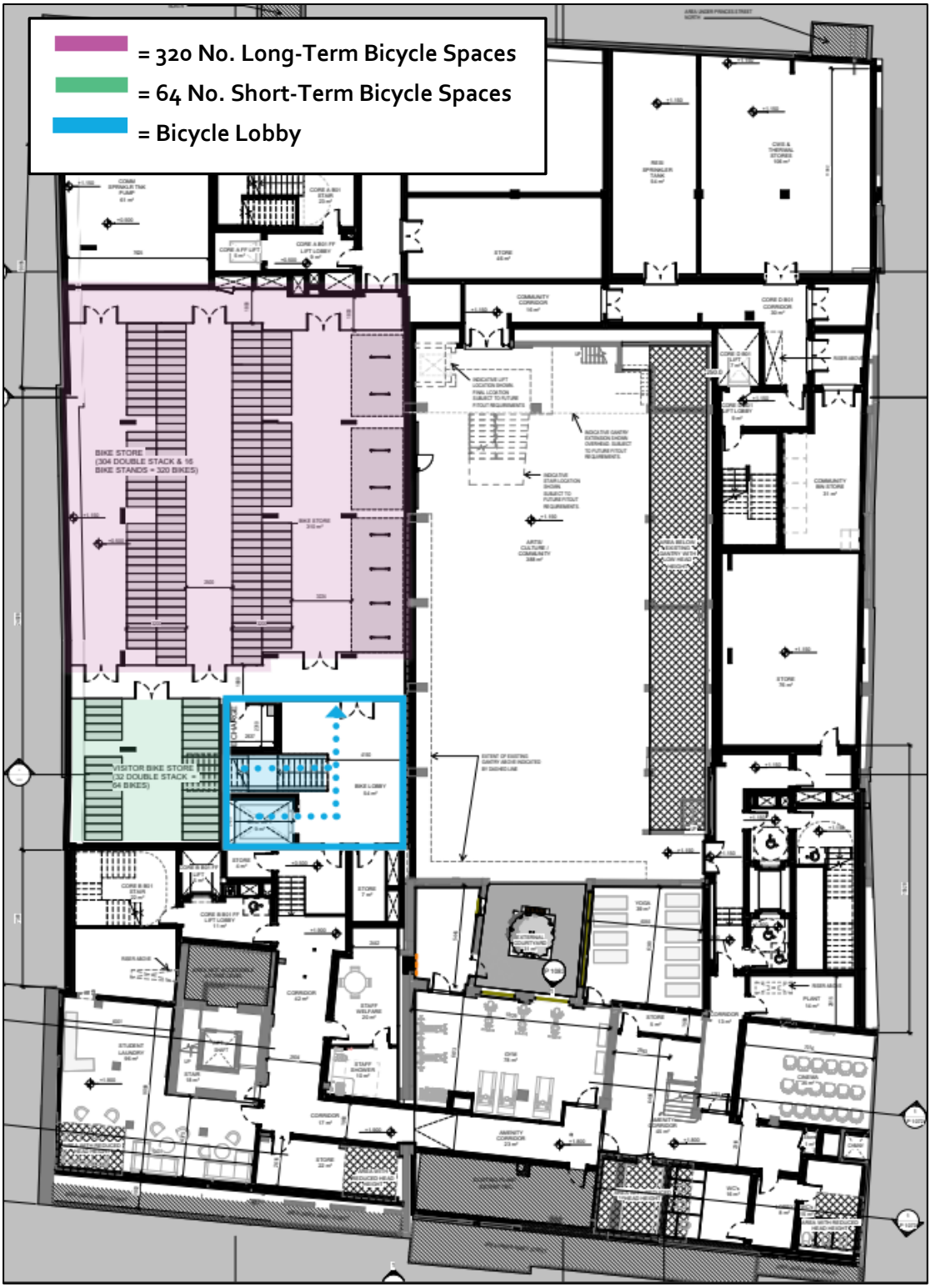


Figure 5.10: **Access Arrangements & Location of Bicycle Stores for the Proposed Student Accommodation**

(Source: ***Architectural Design Statement*** **by Henry J Lyons, Annotated by Thornton O'Connor Town Planning, 2025)**

5.3.3 Height & Massing

The proposed development will provide a part 1 No. to part 9 No. storey building, which is an increase in height from the existing structures on site that range between 1 No. storeys to part 6

No. storeys. However, as illustrated in Figure 5.11 below, the 9 No. storeys covers only a small portion of the building; equating to 230 sq m and representing c. 1.49% of the total gross floor area of the development. The 9 No. storey elements are necessary for the proposed development as they facilitate access to the eighth-floor student amenity space (internal and external) and plant.

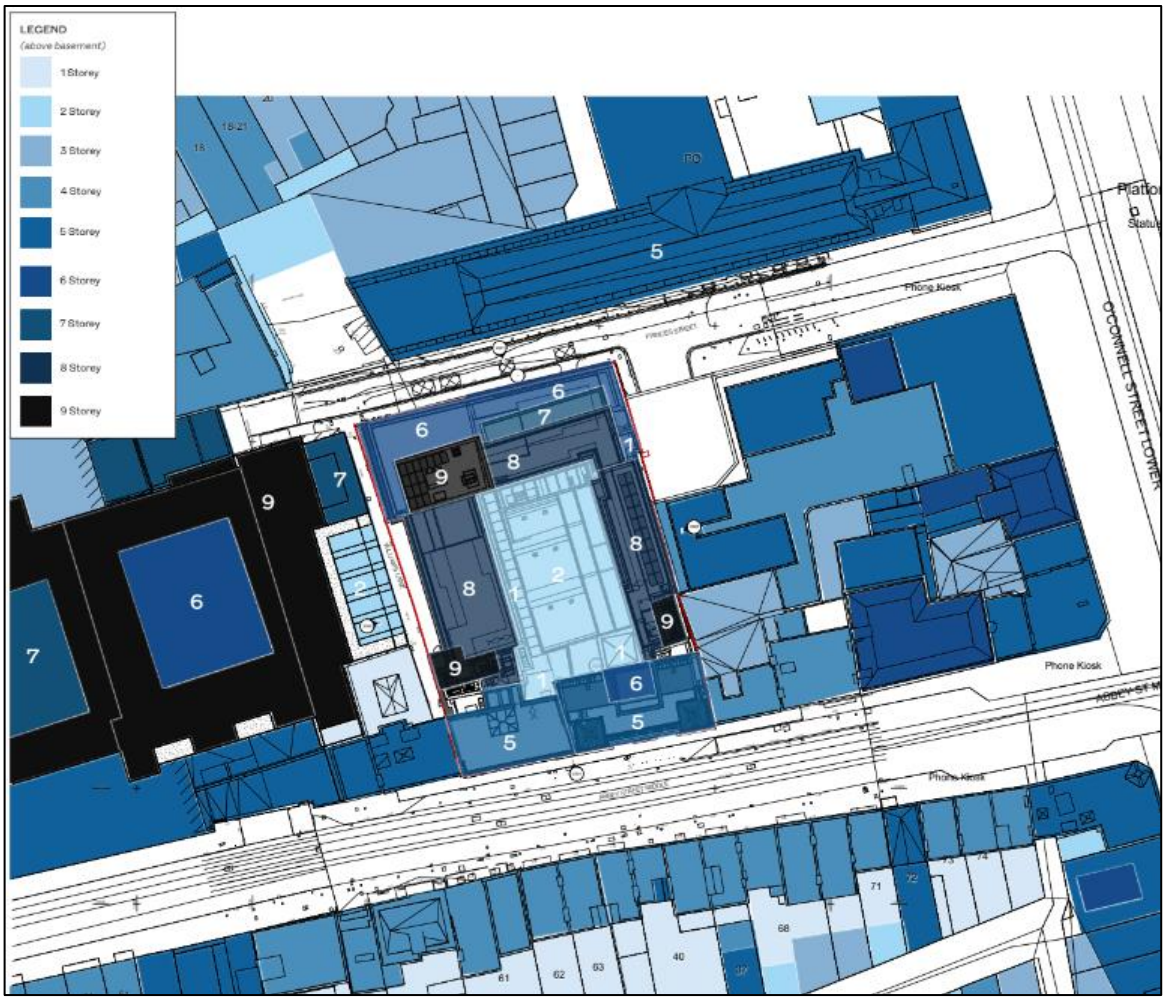


Figure 5.11: Proposed Building Heights (Including Surrounding Existing Properties & Permitted Developments)

(Source: *Architectural Design Statement* by Henry J Lyons, 2025)

5.3.4 Retail & Café/Restaurant

The proposed development will include active street uses through the provision of 3 No. retail units and a café/restaurant unit at ground floor level (Figure 5.12).

The café/restaurant unit will be located at the north-east corner of the building along Prince's Street North and will provide 254 sq m of floor space. The northern façade of the café/restaurant unit will benefit from the retention and refurbishment of the historic and architecturally significant 5-bay Prince's Street North elevation.

The retail units will provide a total of 216 sq m in floor area and are broken down as follows:

- Retail Unit No. 1: this is the smallest of the retail units, measuring 71 sq m, and will be located at the corner of Prince's Street North and William's Lane;

- Retail Unit No. 2: this retail unit will provide 76 sq m of floor space and will be located at the corner of Middle Abbey Street and William's Lane; and

- Retail Unit No. 3: this unit will provide 69 sq m of floor space and will be located along Middle Abbey Street between Unit No. 3 and the main student entrance.

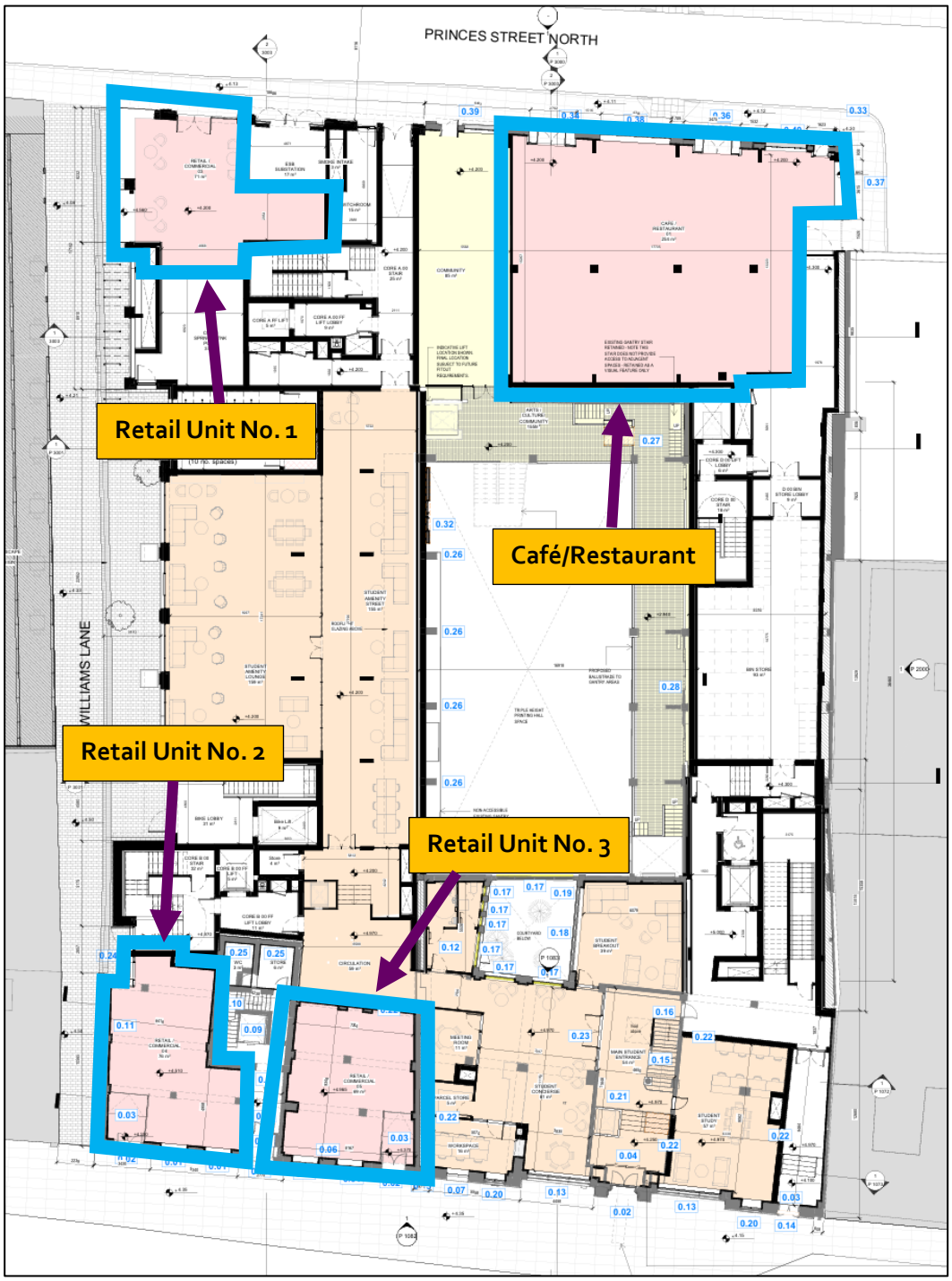


Figure 5.12: **Location of the 3 No. Retail Units and Café/Restaurant on the Ground Floor of the Proposed Development**

(Source: **Drawing No. 'P1010' by Henry J Lyons, Annotated by Thornton O'Connor Town Planning, 2025)**

5.3.5 Cultural/Community

The proposed development seeks to provide 644 sq m of cultural/community space. This is provided principally in the part retained and restored Printing Hall at basement level (c. 404 sq m) with some additional space provided at ground level (c. 240 sq m).

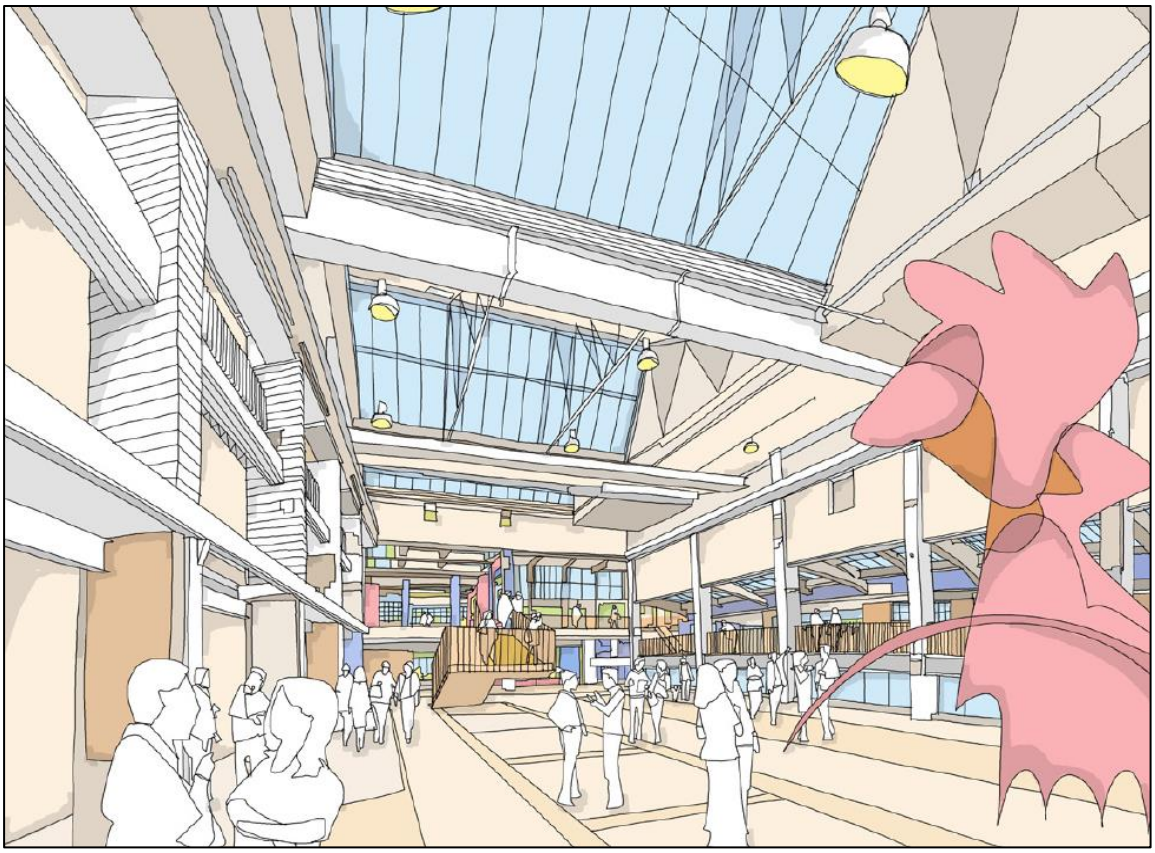


Figure 5.13: Concept Sketch Design of the Proposed Cultural/Community Space

(Source: *Architectural Design Statement* by Henry J Lyons, 2025)

5.3.6 Bicycle Parking

The proposed development seeks to provide a total of 408 No. bicycle parking spaces. The breakdown of the proposed long-term and short-term parking spaces and the number of spaces dedicated to each use of the development is provided in the following table:

Use	Long-Term (students/staff)	Short-Term (visitors)
Student Accommodation	320	64
Student Accommodation (staff only)	2	0
Retail Units	2	2
Café/Restaurant	2	5
Community/Cultural	4	7
Total	**330**	**78**
	408	

Table 5.4: Proposed Bicycle Parking Breakdown

(Source: Details Provided by Henry J Lyons, Table Generated by Thornton O'Connor Town Planning, 2025)

The bicycle parking arrangements for the Student Accommodation have already been discussed in Section 5.3.2.4 above.

The 10 No. long-term spaces for the staff of the Student Accommodation, retail units, café/restaurant, and the cultural/community space will be provided as 5 No. Sheffield type stands located in a dedicated bike store. The bike store will be located within the western extent of the building at ground floor level and is accessed directly from William's Lane. There will be 2 No. shower facilities also provided adjacent to the staff bike store, as well as another shower facility for the staff of the Student Accommodation located at basement level.

The 14 No. short-term spaces for the visitors of the retail units, café/restaurant, and the cultural/community space will be provided as 7 No. Sheffield type stands located along William's Lane.

Please refer to Figure 5.14 for the location of the long-term and short-term spaces for the retail units, café/restaurant, and the cultural/community space (including the Student Accommodation staff spaces).

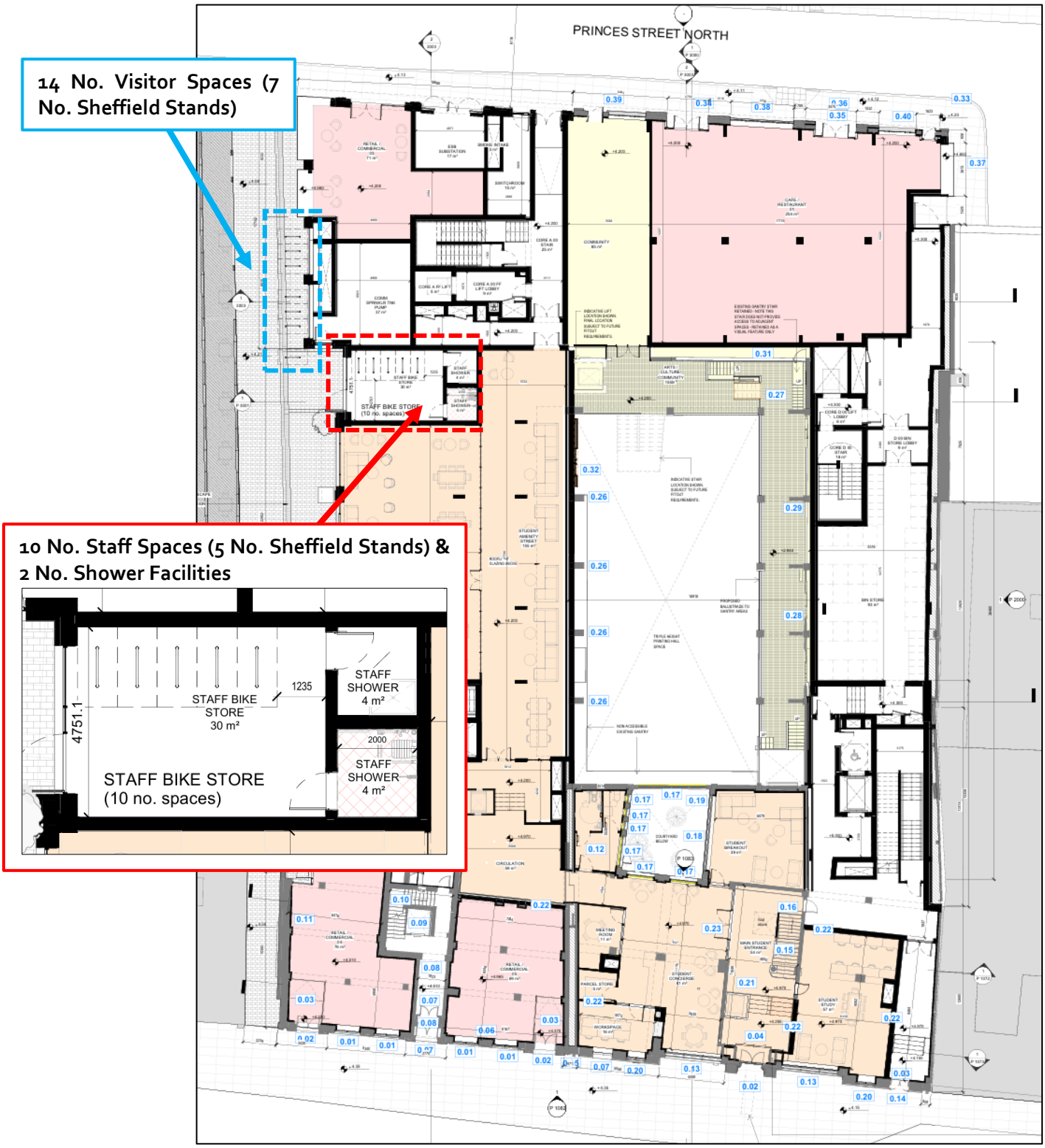


Figure 5.14: Location of the Long-Term & Short-Term Bicycle Parking Spaces for the Proposed Retail Units, Café/Restaurant and Cultural/Community Space (Including the Staff of the Student Accommodation)

Source: Drawing No. 'P 1010' by Henry J Lyons, Annotated by Thornton O'Connor Town Planning, 2025)

6.0 STATEMENT OF CONSISTENCY - NATIONAL POLICY CONTEXT

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

1. *Project Ireland 2040: The National Development Plan 2021-2030;*
2. *Project Ireland 2040: National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
4. *Housing for All – a New Housing Plan for Ireland, September 2021;*
5. *National Student Accommodation Strategy (2017);*
6. *Guidelines on Residential Developments for 3rd Level Students (1999);*
7. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
8. *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024*); and
9. *The Planning System and Flood Risk Management (2009).*

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

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

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

The *NDP* sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in *Housing for All* and will enable a step-change in investment to ameliorate the effects of climate change. The *NDP* underpins the overarching message of the *National Planning Framework.* The *NDP* has 10 No. National Strategic Outcomes (Figure 6.1), with the relevant strategic outcomes and objectives discussed in detail in Section 6.2.2.

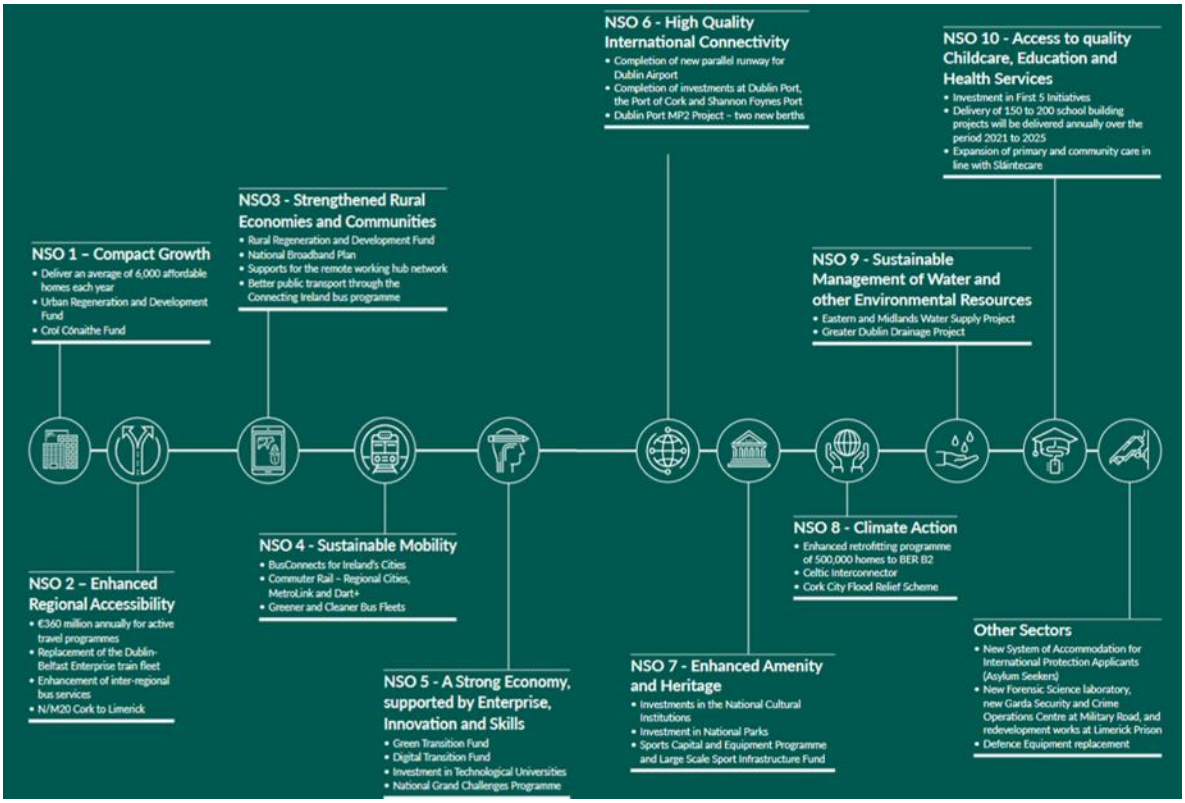


Figure 6.1: Major Investments – National Strategic Outcomes

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

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

6.2.1 Introduction

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

Section 6.6 '*Housing'* in the *NPF* states the following about the supply and demand for Purpose-Built Student Accommodation ('PBSA') in Ireland:

> "*Demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas in particular. In the years ahead, student accommodation pressures are anticipated to increase.* ***The location of purpose built student accommodation needs to be as proximate as possible to the centre of education, as well as being connected to accessible infrastructure such as walking, cycling and public transport***." **[Our Emphasis]**

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

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

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

- "*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."* **[Our Emphasis]**

Therefore, we submit that the redevelopment of a highly underutilised, infill, brownfield site within Dublin City Centre and the restoration of the vacant Independent House to provide some 316 No. student bedspaces, retail units, a café/restaurant, and cultural/community space will contribute to achieving these core principles of the *NPF*.

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

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

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

The acceptability of taller buildings in this location, which has access to the highest quality public transport has already been deemed acceptable with a part 9 No. storey development already granted permission directly adjacent to the subject site (DCC Reg. Ref. 4880/22).

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

6.2.2 National Strategic Outcomes and Objectives

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

1) Compact Growth;
2) Enhanced Regional Accessibility;
3) Strengthened Rural Economies and Communities;
4) Sustainable Mobility;
5) A strong Economy supported by Enterprise, Innovation and Skills;
6) High Quality International Connectivity;

7) Enhanced Amenity and Heritage;
8) Transition to a Low Carbon and Climate Resilient Society;
9) Sustainable Management of Water, Waste and other Environmental Resources; and
10) Access to Quality Childcare, Education and Health Services.

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

No.	Objective:	How it is Addressed by this Development:	Does it meet the criteria:
1	Compact Growth	Sustainable and efficient use of an underutilised, infill and brownfield site in an existing urban area to provide a Student Accommodation scheme which will contribute positively towards addressing the acknowledged deficit in PBSA.	Yes
2	Enhanced Regional Accessibility	Located within comfortable walking distance to a variety of high-quality public transport options that provides services across Dublin City and beyond.	Yes
3	Strengthened Rural Economies and Communities	N/A – Urban Area	N/A
4	Sustainable Mobility	The site is located within comfortable walking distance to a variety of Third-Level Education Institutions, such as Trinity College Dublin and Griffith College. The location of the site also benefits from its proximity to numerous public transport options such as the Green & Red Line Luas, multiple bus stops along O'Connell Street and Connolly and Tara Street Stations. There are 408 No. bicycle spaces proposed for the development to encourage students, staff and visitors to cycle to and from the site.	Yes
5	A Strong Economy supported by Enterprise, Innovation, and Skills	The proposed development will strengthen the local economy through the provision of 3 No. retail units and a café/restaurant unit. The development will also see the employment of staff required to run the Student Accommodation. The future students will also likely secure part-time jobs in the local area, contributing further to the local economy.	Yes

6	High Quality International Connectivity	N/A – Relates to Ports and Airports	N/A
7	Enhanced Amenity and Heritage	Communal spaces will be provided in the form of internal and external amenity space for students of the accommodation to utilise and enjoy. There will be a total of 1,834 sq m of amenity space dispersed across basement level, ground floor, fourth floor, fifth floor, sixth floor and eighth floor. The proposed development also seeks to enhance the public realm through the reimagination of William's Lane. The laneway will experience an increase of passive surveillance with the main student amenity lounge area orientated to address William's Lane. Independent House is of architectural heritage significance comprising 2 No. Protected Structures on site (RPS No. 18 & 8797). Currently, as evidenced in Section 2.2 of this Report, the subject structures have experienced significant damage and deterioration throughout the years due to the long-term vacancy and little intervention to prevent further damage. The proposed development will not only provide retail units, a café/restaurant, cultural/community space and much needed PBSA bedspaces, but will also enhance the Protected Structures through careful restoration works. The *Architectural Heritage Impact Assessment* prepared by Molloy & Associates Conservation Architects and submitted herewith concludes that "*Without intervention, this prominent landmark building range will continue to decay*" and that the "*proposed adaptive reuse of the building range is considered a viable strategy to reoccupy the site while simultaneously safeguarding the external character of the early 20th century grouping*".	Yes
8	Transition to a Low Carbon and Climate Resilient Society	The proposed development has been subject to detailed design which prioritises the energy performance of the building. A *Climate Action, Energy & Sustainability Report* prepared by OCSC details the strategy to address various climate mitigation measures in the built environment.	Yes

		The proposed development has been designed in line with the principles of the energy hierarchy – Be Lean, Be Clean & Be Green. This ensures the development prioritises passive measures which reduces carbon, balances high quality daylight while ensuring thermal comfort is maintained year-round via mixed mode ventilation and passive fabric specification. Due to the location of the site to high quality public transport options, services, facilities and amenities, and Third-Level Education Institutions, the proposed level of cycle parking (408 No. spaces), and the zero level of car parking provided reduces carbon dioxide emissions associated with private car usage.	
9	Sustainable Management of Water, Waste and other Environmental Resources	Please see enclosed the *Operational Waste Management Plan* prepared by Enviroguide Consulting and the *Climate Action, Energy & Sustainability Report* prepared by OCSC. Sustainable management of energy use, management of water use and waste output are detailed in the accompanying reports. Sustainable modes of transport are encouraged by providing a car free development.	Yes
10	Access to Quality Childcare, Education, and Health Services	There are numerous Third-Level Education Institutions located within a kilometre walking distance of the site, as detailed in the accompanying *Social Infrastructure Audit*. The location of the site to high quality public transport options also provides access to Third-Level Education Institutions that are located further out of the City Centre. As demonstrated in the *Social Infrastructure Audit* prepared by Turley, there are sufficient healthcare services, including GP's, dental surgeries and pharmacies located within proximity to the site.	Yes

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

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

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;
- Scale, Massing and Design;
- Justification and Housing Need;
- Waste and Environmental Issues; and
- Implementing the National Planning Framework.

6.2.2.1 Population Growth and Employment

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

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

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

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

- **National Policy Objective 3b** aims to deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

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

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

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

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

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

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

The proposed development is located on an underutilised, infill, and brownfield site in the core of Dublin City. The subject site is eminently suitable for retail/commercial use due to its proximity to some of the main shopping streets in the City Centre, including O'Connell Street and Henry Street. Given the proximity of the site to public transport options for students to travel to multiple Third-Level Education Institutions as well as being located within a comfortable walking distance to various Third-Level Education Institutions, such as Trinity College Dublin and Griffith College, the proposed PBSA development is indubitably suitable for such use.

Although the scheme is mainly Student Accommodation, it is our opinion that the proposed development is consistent with NPOs 2a, 3a and 3b which aim to provide for 50% of future population and employment growth within the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints. The provision of PBSA will increase the quantum of available private rented accommodation in the City. The development will also increase employment opportunities in the City through the 3 No. retail units and café/restaurant located in proximity to some of the main shopping streets in Dublin, such as O'Connell Street and Henry Street.

The scheme will include communal amenity spaces for the students to utilise and socialise amongst each other. The proposed public realm improvements along William's Lane will significantly improve the useability and enjoyability of the laneway, which is in desperate need of revitalisation. These high quality, attractive and liveable spaces will ensure the residents and the wider public have the opportunity to interact with each other and create an integrated community within the scheme in accordance with NPO 4. The proposed development will also introduce a diverse student population into the area in accordance with NPO 4.

The scheme will appropriately densify the subject site in accordance with NPO 5 which aims to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

The addition of 316 No. student bedspaces, retail units, a café/restaurant and cultural/community space constitutes a significant investment in an underutilised, infill and brownfield site within the existing built-up area. Rather than continuing the sprawl of city development, the subject scheme adds student bedspaces in close proximity to multiple public transport options and Third-Level Education Institutions and has been designed to ensure an appropriate densification of a brownfield site, in accordance with the preferred approach of the *NPF*. The proposed development is consistent with the NPOs set out within this Section.

6.2.2.2 Current Trends in Tenure and Household Formation in Ireland

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

In Section 6.5 of the *NPF* the following is stated under the heading *'Education'* in relation to investment in Higher Education Institutions/Third-Level Institutions:

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

As the State and Third-Level Education Institutions understand that investment must be made to expand their campus facilities to meet future changes in the economy and increased demand for Student Accommodation, similarly the private sector is expected to provide for the additional capacity in existing and new Student Accommodation. The location of off-campus PBSAs therefore benefits from strong site selection and proximity to Third-Level Education Institutions, employment, and strong urban settlements with the infrastructure, amenities and social infrastructure to support additional population.

National Policy Objective 31 states the following:

"Prioritise the alignment of targeted and planned population and employment growth with investment in:

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

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

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

Due to the number of Third-Level Education Institutions located in Dublin City Centre, there is an eminent demand to provide PBSA where there is suitable infrastructure to support it. In turn this can aid in consolidating population density and catering to the specific lifecycle needs of students within supportive environments and established communities. Therefore, the provision of 316 No. Student Accommodation bedspaces within a suitable location to Third-Level Education Institutions and public transport options is in line with the objectives of the *NPF*.

National Policy Objective 35 states the following:

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

The proposed development is in accordance with NPO 35 as it: proposes to restore the Protected Structures and other historic structures on site that have been left vacant for over 20 No. years; represents site-based regeneration of an underutilised, infill site; and provides increased building heights and densities.

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

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

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

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

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

In accordance with NPOs 6,11 and 32, the proposed development will rejuvenate this site and will provide much needed PBSA in Dublin City. As one of the 5 No. centres of growth within the *NPF*, the Dublin City region is also a location for significant investment in higher education and highly skilled parts of the economy which co-locate with Universities and Colleges. The further expansion of Third-Level Education Institutions within Dublin will require a quantum of off-campus Student Accommodation which can provide additional supply to compliment this growth. Therefore, the proposed additional 316 No. bedspaces is in line with National Planning Objectives of the NPF which recognises the changing role and function of settlements.

6.2.2.3 Sustainable Modes of Transport

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

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

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

The subject site is bounded to the south by Middle Abbey Street, to the north by Prince's Street North and to the west by William's Lane, providing safe and direct pedestrian links to local services and facilities. There are numerous Third-Level Education Institutions within comfortable walking distance from the subject site, such as Trinity College Dublin located only c. 550 metres / 8-minute walk south-east of the site.

As the subject site is located in close proximity to O'Connell Street, there is a plentiful supply of bus stops with services providing numerous routes throughout the City and beyond. The subject site has the benefit of both the Green and Red Line Luas services with the nearest Green Line Luas stop located at O'Connell Street to the north-east and the nearest Red Line Luas stops located at Abbey Street to the east and Jervis to the west.

As the proposed development will be a car free scheme, residents, staff and visitors will be encouraged to either walk, cycle or use public transport options nearby. The proposed 408 No. cycle spaces will contribute to this initiative for active travel and sustainable modes of transport.

Currently there is dead frontage along Middle Abbey Street and Prince's Street North which discourages people from traveling through the highly underutilised William's Lane. The refurbishment works to the retained structures and facades and the proposed new build elements, along with the proposed uses at ground floor, will attract and increase the level of pedestrians utilising the reimagined William's Lane.

The strategic location of the subject site provides for an accessible and well-connected location which helps to support sustainable transport patterns. The proposed development is consistent with NPOs 26 and 27 as set out above.

6.2.2.4 Scale, Massing and Design

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

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

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

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

The proposed scheme seeks to provide an increased density in an appropriate location adjacent to a range of services and facilities. The scheme will result in a high-quality architectural design,

which has been informed by the surrounding existing context, and appropriately densifying an underutilised, vacant, infill and brownfield site.

The subject site currently ranges in height between part 1 No. storey to part 6 No. storeys. The proposed development seeks to appropriately densify the subject site through increased height and scale. The height of the proposed development will provide heights of part 1 No. to part 9 No. storeys above basement level, which has been designed in the context of the surrounding height of permitted development (built out or granted permission). The subject scheme has been designed to ensure there is limited impact on the amenity of surrounding properties, acknowledging that the site is located within the core area of Dublin City Centre where some impacts will occur.

It has been demonstrated in the accompanying documentation that the proposed development will not cause a significant negative impact on the surrounding area, despite the increase of height on site. The *Townscape and Visual Impact Assessment* concludes the following:

> "*In conclusion, the assessment has found that **the site is well suited for intensification of land use** through increased building height, as the new built form can be positioned on the site to avoid significant townscape and visual effects except on the immediate environs – specifically Prince's Street North and William's Lane. These elements of the townscape are both currently in poor condition and would benefit significantly from the proposed development.*
>
> *The assessment of the design (in Section 4), and the potential visual effects (in Section 5) indicates that **the proposal represents a carefully considered response to both the opportunity presented by the site and the many sensitivities in the area**. Importantly, the development would have no negative effect on any of the local sensitive receptors such as the GPO, the O'Connell Street ACA, the Moore Street National Monument, or the many protected structures on Middle Abbey Street and elsewhere in the vicinity.*
>
> *The proposed development's effects on the townscape – in terms of its character, environmental quality, visual amenity and function (especially in relation to pedestrian permeability and activity) – would be **overwhelmingly positive**.*" **[Our Emphasis]**

The *Daylight and Sunlight Assessment Report* concludes the following:

> "*It is the opinion of 3DDB that **a balance has been achieved in delivering an appropriately dense development** that will provide much-needed bedspaces for students within the city centre. Care was taken to minimize any unreasonable impact on neighbouring properties, with particular consideration given to the GPO, due to its historical and cultural significance*." **[Our Emphasis]**
>
> "*In conclusion, urban regeneration in the heart of the capital is challenging to achieve without some degree of non-compliance with the BRE Guidelines for daylight and sunlight. However, the proposed development strikes a favourable balance, performing well in both overall scheme quality and its impact on neighbouring properties. This sustainable design makes effective use of an underutilized city-centre site.*"

The *Acoustic Design Statement* concludes the following:

> "*Following **the noise mitigation recommendations in this report, the construction phase is expected to meet the requirements** of BS 5228 based on the information provided to WDA*." **[Author's Emphasis]**

"*An operational noise impact assessment has been undertaken considering the noise generated in the communal amenity space, and the plant and equipment on the rooftop.* ***It is predicted that the development will not cause a negative noise impact on the nearby noise sensitive locations***." **[Author's Emphasis]**

The proposed development is consistent with NPOs 13, 33 and 35 as set out above.

6.2.2.5 Waste and Environmental Issues

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

- **National Policy Objective 52** sets out that the planning system must respond to the environmental challenges and have regard for to relevant environmental legislation.
- **National Policy Objective 54** aims to reduce the nations carbon footprint by integrating climate action into the planning system.
- **National Policy Objective 56** sets out the intentions for sustainably managing waste.
- **National Objective 57** identifies specific objectives to enhance water quality and resource management.
- **National Policy Objective 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective 60** outlines the importance to appropriately conserve and enhance the natural and cultural heritage of Ireland.
- **National Policy Objective 63** is in regard to the management and conservation of water resources and water services infrastructures.
- **National Policy Objective 64** sets out to "*Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions."*
- **National Policy Objective 65** supports the aims of the Environmental Noise Regulations.
- **National Policy Objective 75** stipulates that "*all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.*"

The proposed scheme has had regard to relevant environmental legislation as set out in the enclosed reports in accordance with NPO 52. The redevelopment of the subject site will provide

a population in close proximity to Third-Level Education Institutions and public transport and will encourage walking, cycling, and use of public transport in accordance with NPO 54 and NPO 64 which sets out to improve air quality through promoting development that facilitates sustainable modes of transport.

The redevelopment of the site will also enhance the streetscape along Middle Abbey Street, William's Lane and Prince's Street North which will positively contribute to the surrounding area by enhancing passive surveillance and legibility for the area. The development will also contribute to the green infrastructure of the city by providing high-quality landscaping within the redevelopment (NPO 58) including green roofs which will provide significant biodiverse improvements to the site.

The scheme does not propose any car parking spaces due its central location in proximity to public transport options, Third-Level Education Institutions, services, facilities and amenities. By providing no car parking, the subject scheme encourages future residents to either walk, cycle or use public transport to travel. There will be 408 No. bicycle parking spaces provided that will encourage residents, staff and visitors to cycle. Therefore, the subject scheme will contribute to consolidated growth and the reduction in carbon emissions. The proposed scheme will promote sustainable modes of transport resulting in a lower carbon footprint and will be consistent with NPO 54.

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

- *Appropriate Assessment Screening Report* prepared by Enviroguide Consulting;
- *Climate Action, Energy & Sustainability Statement* prepared by OCSC;
- *Operational Waste Management Plan* prepared by Enviroguide Consulting;
- *Resource Waste Management Plan* prepared by Waterman Moylan Engineering Consultants;
- *Construction Environmental Management Plan* prepared by AWN;
- *Travel Plan* prepared by Waterman Moylan Engineering Consultants;
- *Bicycle Parking Management Plan* prepared by Waterman Moylan Engineering Consultants; and
- *Landscape Design Access Statement* prepared by Cameo & Partners.

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

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

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

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

Pillar No. 1 – Address Homelessness;
Pillar No. 2 – Accelerate Social Housing;
Pillar No. 3 – Build More Homes;
Pillar No. 4 – Improve the Rental Sector; and
Pillar No. 5 – Utilise Existing Housing.

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

> **Pillar No. 3**: Build More Homes – Increase the output of private housing to meet demand at affordable prices.

> **Pillar No. 4**: Improve the Rental Sector – Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents. Support greater provision of Student Accommodation.

Rebuilding Ireland notes that the student population is projected to grow by around 20,000 students (or 15%) to approximately 193,000 No. students by 2024. *Rebuilding Ireland* also notes that the *'Report on Student Accommodation: Demand and Supply'* (2015) by the Higher Education Authority estimates that approximately 25,000 No. student bedspaces will be required nationally to meet the increase in demand resulting from the growth of the student population. As noted in the extracts from the 2025 Lisney Report in Section 3.1 above, there were almost 266,000 students enrolled in Higher Education Institutions during the 2023/2024 academic year, which significantly exceeds the anticipated growth as stated in *Rebuilding Ireland.*

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

Key Action No. 4.7

Key Action No. 4.7 states that *Rebuilding Ireland* will:

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

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

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

Key Action No. 4.8

Key Action No. 4.8 states that *Rebuilding Ireland*:

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

The stated objective for key action No. 4.8 is:

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

Key Action No. 4.10

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

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

The stated objective for key action No. 4.10 is:

"To assist students in finding appropriate accommodation."

Key Action No. 4.13

Key Action No. 4.13 outlines the intention to:

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

The stated objective for Key Action No. 4.13 is:

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

All of these proposed Key Actions and a commitment to the production of the *National Student Accommodation Strategy* have contributed to the growth and continuing delivery of PBSAs to the economy, with the majority taking place in the Greater Dublin Area. Please refer to Section 6.5 for details of the *National Student Accommodation Strategy*.

The proposed Student Accommodation would provide for affordable accommodation in an urban area of high demand in close proximity to Third-Level Education Institutions and public transport. The 316 No. new bedspaces will help to directly address the evident housing need, responding proportionately to the pillars as set out above. With less students requiring accommodation in the private market, this will result in additional availability of properties for other renters.

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

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

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

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

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

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

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

6.5 *National Student Accommodation Strategy* (2017)

The *National Student Accommodation Strategy* (2017) was designed to ensure that there is an increased level of supply of PBSA to reduce the demand for accommodation in the private rental sector by both domestic and international students attending our Third-Level Education Institutions.

Section 2 of the Strategy notes the importance of providing PBSA in proximity to Third-Level Education Institutions and particularly on sites capable of regeneration:

> "*Appropriately located high-quality, purpose-built and professionally managed student accommodation, can make educational institutions more attractive to students from Ireland and abroad, and can also become a revitalising force for regeneration areas.*"

Section No. 6 of the *National Student Accommodation Strategy* highlights the role of the private sector in developing PBSA's. The report states:

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

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

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

Below is an extract from the *National Student Accommodation Strategy* outlining the demand for Student Accommodation in 2019 and the projected supply and demand for PBSA's in Dublin up to 2024:

Current and Projected Supply and Demand

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

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

Therefore, the provision of 316 No. student bedspaces at this redevelopment site in Dublin City Centre, will contribute to the overall supply for Student Accommodation in Dublin.

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

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

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

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

The subject scheme has been largely designed in accordance with the floor area parameters outlined in the *1999 Student Guidelines,* as demonstrated below:

CLUSTER & STUDIO AREA SCHEDULE			
FLOOR	Cluster Name	GFA (m2)	Capacity (person)
BASEMENT			
GROUND			
FIRST	A 0101	151	6
	A 0102	32	1
	A 0103	142	6
	A 0104	131	5
	A 0105	30	1
	A 0106	167	8
	A 0107	26	1
	B 0101	168	8
	B 0102	131	5
	C 0101	134	6
	C 0102	25	1
	C 0103	27	1
	C 0104	26	1
	C 0105	26	1
	C 0106	25	1
	C 0107	25	1
SECOND	A 0201	150	6
	A 0202	32	1
	A 0203	142	6
	A 0204	130	5
	A 0205	30	1
	A 0206	167	8
	A 0207	25	1
	B 0201	168	8
	B 0202	133	5
	C 0201	134	6
	C 0202	25	1
	C 0203	26	1
	C 0204	25	1
	C 0205	25	1
	C 0206	25	1
	C 0207	26	1
	C 0208	36	2
THIRD	A 0301	151	6
	A 0302	32	1
	A 0303	142	6
	A 0304	131	5
	A 0305	30	1
	A 0306	168	8
	A 0307	25	1
	B 0301	168	8
	B 0302	133	5
	C 0301	134	6
	C 0302	25	1
	C 0303	27	1
	C 0304	25	1
	C 0305	26	1
	C 0306	28	1
	C 0307	25	1
	C 0308	36	2

CLUSTER & STUDIO AREA SCHEDULE			
FLOOR	Cluster Name	GFA (m2)	Capacity (person)
FOURTH	A 0401	150	6
	A 0402	32	1
	A 0403	142	6
	A 0404	131	5
	A 0405	30	1
	A 0406	168	8
	A 0407	25	1
	B 0401	168	8
	B 0402	136	5
	C 0401	134	6
	C 0404	28	1
	C 0405	28	1
	C 0406	28	1
FIFTH	A 0501	150	6
	A 0502	32	1
	A 0503	142	6
	A 0504	131	5
	A 0505	30	1
	A 0506	168	8
	A 0507	25	1
	B 0501	168	8
	C 0501	134	6
SIXTH	A 0603	33	1
	A 0604	192	8
	A 0605	26	1
	A 0607	168	8
	B 0601	168	8
	C 0601	134	6
SEVENTH	A 0702	33	1
	A 0704	124	5
	A 0705	27	1
	A 0707	167	8
	B 0701	168	8
	C 0701	133	6
TOTAL	0	7424	316

Figure 6.2: Cluster & Studio Area Schedule

(Source: *Schedule of Accommodation*, Henry J Lyons, 2025)

We note that some of the clusters exceed the maximum gross floor area of 160 sq m with the exceedance being as a result of the circulation space of the clusters, the fact that the standard bedrooms are slightly bigger than the minimum standards, due to the fact that the larger accessible rooms are provided in clusters for integration, and the location of some of the clusters within the retained Independent House and Emerald Chambers, which are Protected Structures. The larger clusters are considered a positive element of the subject scheme.

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

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

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

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

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

Out of the 316 No. bedspaces within the proposed development, there are 5 No. accessible rooms and 10 No. accessible studios for future residents. This equates to almost 1 out of every 21 No. bedspaces and therefore exceeds the requirement of the guidelines.

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

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

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

Although there is no specific guidance in relation to the level of provision of amenity spaces outlined in the *Guidelines on Residential Developments for 3rd Level Students* (1999), Section 16.10.7 of the *Dublin City Development Plan 2022-2028* (discussed in more detail in Section 8.0 below) states that:

> *"Adequate external open space of suitable orientation should be provided within developments for the amenity of students. Generally ground floor courtyards that achieve appropriate daylighting and sun lighting will be required. In certain circumstances, terraces and roof gardens will be considered but only in addition to appropriate ground level amenity provision……All proposed must provide appropriate indoor and outdoor communal and recreational facilities for students at* ***a combined level of at least 5-7 sq. m. per bedspace****."*
> **[Our Emphasis]**

For the purpose of designing the subject scheme, the above standard has been applied and some 5.8 sq m per bedspace has been provided.

The subject scheme includes the provision of 1,211 sq m internal dedicated amenity space and 623 sq m of high quality external amenity space for future residents to enjoy. The total quantum of external and internal communal amenity space equates to 1,834 sq m or 5.8 sq m of amenity space per resident, in excess of the Dublin City Council standard.

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

The *Urban Development and Building Heights Guidelines for Planning Authorities* ('*Building Height Guidelines*') were adopted in December 2018 under Section 28 of the *Planning and Development Act 2000* (as amended). An Bord Pleanála and Planning Authorities must have regard to these Guidelines and, in particular, compliance with the Specific Planning Policy Requirements (SPPRs) is mandatory (see Section 28(1)(C) of the *Planning and Development Act 2000* (as amended)).

The *Building Height Guidelines* were prepared to work in concert with the objectives of the *NPF* and other national standards for the delivery of sustainable development and compact growth. The *Building Height Guidelines* set out that a key objective of the *NPF* is to significantly increase the building heights and overall density of developments. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The *Building Height Guidelines* are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards.

The *Building Height Guidelines* state that the:

> "*Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes,* ***by building up and consolidating the development of our existing urban areas.***" **[Our Emphasis]**

The *Building Height Guidelines* further note that:

> "***A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development*** *is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.*" **[Our Emphasis]**

The *Building Height Guidelines* also emphasises that increasing prevailing building heights have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and it notes that the planning process must actively address how this objective will be secured. The *Building Height Guidelines* expressly seek increased building heights in urban locations:

> "*In relation to the assessment of individual planning applications and appeals, it is Government policy that* ***building heights must be generally increased in appropriate urban locations.*** *There is therefore a presumption in favour of buildings of* ***increased height in our town/city cores and in other urban locations with good public transport accessibility****."* **[Our Emphasis]**

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

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

In accordance with SPPR1, the *Dublin City Development Plan 2022-2028* identified a series of areas within which additional height would be supported, with 'City Centre and within the Canal Ring (inner suburbs)' and 'Public Transport Corridors' considered to be applicable to the subject site. Accordingly, the *Dublin City Development Plan 2022-2028* prescribes a series 10 No. objectives and associated criteria in Table 3 of Appendix 3 which development of increased height exceeding the prevailing context must meet. These are responded to in Section 8.2.4.2 further in this Report, demonstrating how the proposed development complies with them and can support the delivery of sustainable development.

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

6.8 *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)*

The recently adopted *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024*) ('*Compact Settlement Guidelines*') replaces the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) ('Sustainable Residential Development Guidelines 2009')*.

The *Compact Settlement Guidelines* primarily relates to standardised forms of residential development such as apartments and houses, rather than multi-occupational units etc. The only mention of Student Accommodation is in Footnote No. 3 in Section 3.2 of the Report which relates to how the density of Student Accommodation is calculated:

> "*When calculating net densities for shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling.*"

Based on the 316 No. bedspaces proposed for the development, the equivalent number of dwellings equates to 79 No. units.

Policy and Objective 3.1 of the *Compact Settlement Guidelines* states the following:

[11] SPPR 3: "*It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise…*"

"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate."

Establishing the density range for sites is based on its settlement size and area type set out in Tables 3.1 – 3.7 of the *Compact Settlement Guidelines.* As the subject site is located in 'Dublin City & Suburbs', the *Compact Settlement Guidelines* set out 3 No. areas and density ranges for the area:

City - Centre

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

City - Urban Neighbourhoods

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

City - Suburban/Urban Extension

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

Figure 6.3: Density Ranges for Sites Located in 'Dublin City & Suburbs'

(Source: *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)*)

The subject site is considered to fall within the categorisation of 'City – Centre' and for such locations, the *Compact Guidelines* state that **densities in the range of 100-300 dwellings per hectare (dph) shall be applied**.

Using the density calculation provided in Appendix B of the *Compact Settlement Guidelines* and the equivalent quantum of residential units proposed for the development (79 No. units), the density of the proposed development is 289 dph. Please refer to the last page of the *Schedule of Accommodation* prepared by Henry J Lyons for the density calculation as per Appendix B of the *Compact Settlement Guidelines.* The 289 dph is within the density range generally applied to the subject site above.

The *Compact Settlement Guidelines* provide further guidance relating to 'Refining Density' to take account of specific characteristics and constraints of individual sites. This additional requirement is intended to incorporate the nuances of individual sites, pushing their densities up and down within the ranges set by the *Compact Settlement Guidelines*. 'Refining Density' is principally (but not solely) comprised of 2 No. steps, which require consideration of: (1) accessibility; and (2) character, amenity and natural environment.

STEP 1: ACCESSIBILITY

Table 3.8 of the *Compact Guidelines* sets out the definitions for terms used to define accessibility:

High Capacity Public Transport Node or Interchange

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

Accessible Location

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

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.

Figure 6.4: Terms Used to Define Accessibility

(Source: *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)*)

A 'Transport Node or Interchange' is defined in Appendix A of the *Compact Settlement Guidelines* as "*Places of convergence and interchange between different forms of transportation*".

Many of the public transport options discussed in Section 2.3 of this Report, i.e. the Abbey Street Lower Red Line Luas and O'Connell Street Green Line Luas stops, are considered to fall within the definition of a 'Transport Node or Interchange' due to the short walking distance between the Red and Green Line stops and to the multitude of bus stops nearby. Additionally, Tara Street Station (DART Station) and Connolly Station (Railway Station) are located within a kilometre of the site and also offer a change in public transport option or destination. Therefore, in accordance with the parameters set out in Table 3.8, the subject site is most akin to a 'High Capacity Transport Node or Interchange' location.

Step 2: Impact of Development to the Character, Amenity and Natural Environment

Consideration is given to the impact of the proposed development on the character, amenity and natural environment of the area surrounding the subject site. Section 3.4.2 of the *Compact Settlement Guidelines* state that:

> "*While considerations of centrality and accessibility will have a significant bearing on density, it is also necessary to ensure that the quantum and scale of development at all locations can integrate successfully into the receiving environment. New development should respond to the receiving environment in a positive way and should not result in a significant negative impact on character (including historic character), amenity or the natural environment.*"

1) Character

As discussed throughout this Report, the character of the surrounding area is mixed-use and historic.

Located along Middle Abbey Street, the subject site forms part of an elegant, terraced streetscape that is diversely treated yet cohesive. With a range of uses located along here, such as residential, tourism, restaurant and shops, the street has suffered with high vacancy and dereliction rates, including the structures at the subject site. This has led to dead frontage and deterioration to many historic and Protected Structures.

Prince's Street North to the north of the subject site is "*almost indiscernible to the animation of O'Connell Street*", as stated in the *Architectural Heritage Impact Assessment*, with the blank façade of the adjacent Penneys building and the impervious gable treatment of the GPO lending a "*benign, anonymous character to the street*". The GPO arcade, which is positioned opposite the subject site to the north, has a strong presence at the western extent of the street, whilst the eastern extent of the street is located within the O'Connell Street Architectural Conservation Area.

William's Lane to the west of the subject site is enclosed by the existing, blank-faced structures at the subject site and adjoining Arnott's site to the west. The narrowness and lack of passive surveillance of the laneway lends itself to an oppressive and unwelcoming character.

The subject site is also located in proximity to O'Connell Street; the nation's primary shopping street, which is characterised by tall, terraced structures on either side.

There have been numerous high density developments Granted Permission in the immediate area that continue to contribute to the mixed-use nature of the area, whilst respecting the historic context (refer to Section 4.0 above). Careful consideration and analysis have been undertaken for the overall architectural design of the proposal to ensure the architectural and historic character of the Protected Structures on site, the O'Connell Street Architectural

Conservation Area bounding the north-east of the site, and the mixed-use character of the surrounding area is retained, respected and enhanced.

Furthermore, a *Townscape and Visual Impact Assessment* was prepared by ModelWorks, which assessed the visual impact of the development on the surrounding area when viewed from various important locations nearby the subject site. It was concluded that:

> "*In conclusion, the assessment has found that the site is well suited for intensification of land use through increased building height, as the new built form can be positioned on the site to avoid significant townscape and visual effects except on the immediate environs – specifically Prince's Street North and William's Lane. These elements of the townscape are both currently in poor condition and* ***would benefit significantly from the proposed development****.*
>
> *The assessment of the design (in Section 4), and the potential visual effects (in Section 5) indicates that the proposal represents a carefully considered response to both the opportunity presented by the site and the many sensitivities in the area. Importantly, the development would have no negative effect on any of the local sensitive receptors such as the GPO, the O'Connell Street ACA, the Moore Street National Monument, or the many protected structures on Middle Abbey Street and elsewhere in the vicinity.*
>
> ***The proposed development's effects on the townscape – in terms of its character****, environmental quality, visual amenity and function (especially in relation to pedestrian permeability and activity) –* ***would be overwhelmingly positive****."* **[Our Emphasis]**

We further note the following taken from the *Architectural Heritage Impact Assessment*:

> "*The proposed adaptive reuse of the building range is considered a viable strategy to reoccupy the site* ***while simultaneously safeguarding the external character of the early 20th century grouping*** *from its primary ACA viewpoints*." **[Our Emphasis]**

The proposed development at the subject site would result in some degree of change in the visual environment; however, as noted above, the impact of this would be "*overwhelmingly positive*" and would safeguard the external character of the Protected Structures. Therefore, in our opinion, the proposed development at the subject site would not negatively alter the existing mixed-use and historic character of the local area.

2) Amenity

A *Daylight and Sunlight Assessment Report* has been prepared by 3D Design Bureau and is submitted herewith. The report assesses whether there would be any effect from the proposed development on the level of daylight and sunlight received by neighbouring properties/environment. The following properties were assessed:

a) General Post Office (GPO), windows facing Prince's Street North;
b) Rear of Arnotts;
c) Permitted Hotel Development (Ref. 4880/22) adjacent to the subject site;
d) Nos. 94-96 Middle Abbey Street, facing William's Lane; and
e) Properties east of the subject site:
    i. Nos. 35-39 O'Connell Street;
    ii. No. 84 Middle Abbey Street; and
    iii. Nos. 79-82 Middle Abbey Street.

Figure 6.5 below provides the summary of the impact assessment results on the abovementioned properties:

Impact Assessment Results Overview - Neighbouring Properties:

Effect to Daylight - Vertical Sky Component (VSC) :

Effect to Vertical Sky Component (VSC)		
	Residential Properties	Commercial Premises
Windows/Rooms Assessed	41	138
Negligible	40	35
Minor Adverse	0	35
Moderate Adverse	1	59
Major Adverse	0	9
Beneficial Impact*	0	0
n.a.**	0	0

Effect to Sunlight - Annual Probable Sunlight Hours (APSH):

Effect to Annual Probable Sunlight Hours (APSH)		
	Residential Properties	Commercial Premises
Windows/Rooms Assessed	8	70
Negligible	3	52
Minor Adverse	2	10
Moderate Adverse	1	8
Major Adverse	1	0
Beneficial Impact*	0	0
n.a.**	1	0

Effect to Sunlight - Winter Probable Sunlight Hours (WPSH):

Effect to Winter Probable Sunlight Hours (WPSH)		
	Residential Properties	Commercial Premises
Windows/Rooms Assessed	8	70
Negligible	3	34
Minor Adverse	0	4
Moderate Adverse	0	2
Major Adverse	0	22
Beneficial Impact*	0	0
n.a.**	5	8

Figure 6.5: Summary of the Impact Assessment Results on Neighbouring Properties of the Subject Site

(Source: *Daylight and Sunlight Assessment Report* by 3D Design Bureau, 2025)

Majority of the minor, moderate or major adverse effects to daylight and sunlight of neighbouring properties are associated with windows serving commercial premises rather than residential ones, as illustrated in the table in Figure 6.5 above. In this regard, the following is noted from the *Daylight and Sunlight Assessment Report* regarding the effect to daylight and sunlight in commercial premises:

> "*...it should be taken into consideration that* ***sunlight access is less important in a commercial premises than it is in a residential property****. In an office,* ***excessive sunlight can be considered a negative****, particularly during the winter months, when it can lead to unwanted screen glare.*" **[Our Emphasis]**

As evidenced in Figure 6.5 above, windows of neighbouring properties would experience some degree of impact in terms of daylight and sunlight received, with some experiencing a moderate or major adverse impact; however, the Report notes that "*some level of impact is inevitable if the subject site is to be developed in a viable manner*" and that some of the "*baseline values are*

relatively low" already. Section 5.1.2 of the Report notes the following in relation to a particular window that has been categorised as having a major adverse effect on Winter Probable Sunlight Hours, despite having an extremely low baseline value (at 1.32%):

> "*The effect on this window is considered 'major adverse' but it must be stressed that this does not represent a significant reduction to sunlight access, but is a consequence of a reduction to an already heavily constrained window.*"

Please refer to Appendix A of the *Daylight and Sunlight Assessment Report* for the full results of the Impact Assessment as well as Section 5.0 for an analysis of these results, however, we note the conclusion of the Impact Assessment as follows:

> "*The relationship between the proposed development and the GPO was a key consideration in the design of the proposed development. The primary focus of the daylight and sunlight assessment was to ensure a measured approach was taken regarding the potential impact on the GPO.*
>
> *It is the opinion of 3DDB that* ***a balance has been achieved in delivering an appropriately dense development that will provide much-needed bedspaces*** *for students within the city centre.* ***Care was taken to minimize any unreasonable impact on neighbouring properties****, with particular consideration given to the GPO, due to its historical and cultural significance*." **[Our Emphasis]**

Having regard to the above, it is therefore considered that the proposed development at the subject site would not negatively impact the amenity of existing neighbouring properties.

3) Natural Environment

The following reports have been prepared by Enviroguide Consulting and are submitted herewith, with their conclusions provided below:

a) Appropriate Assessment Screening Report

> "*In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that* ***the possibility may be excluded that the Proposed Development will have a significant effect on any of the European sites*** *listed below:*
>
> - *North Dublin Bay SAC (000206).*
> - *South Dublin Bay SAC (000210).*
> - *North Bull Island SPA (004006).*
> - *South Dublin Bay and River Tolka Estuary SPA (004024).*
> - *North-West Irish Sea SPA (004236).*
>
> *In carrying out this AA screening, any targeted ecological mitigation measures and/or measures intended or included for the purposes of avoiding adverse effects arising as a result of the Proposed Development on any European site have not been taken into account.*
>
> *On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus,* ***there is no requirement to proceed to***

Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required. **[Our Emphasis]**

b) Ecological Impact Assessment Report

"It is considered that, provided the mitigation measures proposed within this report together with all best practice development standards as outlined in the CEMP are carried out in full, ***there will be no significant negative impact to any KER habitat, species group or biodiversity as a result of the Proposed Development****.*

Diligent, best practice surface water protection measures and effective use of SuDS at the Proposed Development have been incorporated into plans and designs, and provide sufficient mitigation against any potential negative effects on surrounding habitats or designated sites.

The targeted ecological surveys allowed for the identification of an active nesting Herring Gull, an amber listed species at the Site, as well as a sufficient understanding of Bat Activity and utilisation of the Site, and, through careful evaluation of the potential impacts ***it is considered that a proportionate and effective solution to mitigate the negative impacts from harming these species from the Site has been achieved.***

Additionally, the landscaping plan for the Proposed Development was designed to ***increase natural habitat variety at the Site that will result from the Proposed Development****."* **[Our Emphasis]**

c) Bat Report

"No buildings or structures on Site were found to contain roosting bats during any survey which suggests that bats are not utilising the stable buildings for roosting.

Based on the findings of this report, no effects on roosting bats are expected as a result of the Proposed Development."

d) EIA Screening Report

"Based on the assessment carried out in the appropriate sections of this Screening Report, it can be concluded that ***the Proposed Development will not have significant effects on the environment during both the Construction and Operational Phases****.*

Having regard to the nature and scale of the Proposed Development on an urban site served by public infrastructure, and the absence of any significant environmental sensitivities in the area, ***it is concluded that, by reason of the nature, scale and location of the subject site, the Proposed Development would not be likely to have significant effects on the environment and a mandatory Environmental Impact Assessment Report (EIAR) is not required for the Proposed Development****."* **[Our Emphasis]**

e) Statement in accordance with Article 103(1A)a of the Planning and Development Regulations 2001, as amended.

"This Statement in accordance with Article 103(1A) a of the Planning and Development Regulations 2001, as amended, details how the available results of all relevant assessments

of the effects on the environment from the Proposed Development have been carried out pursuant to relevant European Legislation.

This Statement, in conjunction with the EIA Screening, has determined that, ***by reason of the nature, scale and location of the Proposed Development site, and the proposed mitigation measures outlined in the other assessments completed for this planning application, the Proposed Development does not require a mandatory Environmental Impact Assessment Report (EIAR)****."* **[Our Emphasis]**

As is evident by the above conclusions of the accompanying environmental and ecological assessments, there will be no negative impact on the natural environment.

Concluding Remarks on Refining the Density Range for the Subject Site

Due to the site's location in the heart of Dublin City Centre where a multitude of public transport options, services, facilities and amenities are available, it is considered that the subject site is in a highly accessible location that is suitable to absorb a higher density development. Furthermore, the subject site will be able to absorb the proposed scale of development whilst not causing any negative impacts on the surrounding character, amenity, or natural environment, as demonstrated in the accompanying plans and assessments.

Having complete the two-step density refining process, we are of the opinion that a residential density range of between 100 dph to 300 dph is appropriate for the subject site and therefore, the proposed density of 289 dph is in accordance with Policy and Objective 3.1 of the *Compact Settlement Guidelines*.

6.9 The Planning System and Flood Risk Management (2009)

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

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The Flood Risk Assessment carried out by Waterman Moylan Consulting Engineers concludes the following:

"*The subject lands have been analysed for risks from flooding from the Irish Sea, fluvial flooding, pluvial flooding, ground water and failures of mechanical systems. Through careful design and appropriate mitigation measures* ***the risks and consequences of flooding have been mitigated across the development****.*

Surface water runoff from the site is limited to Greenfield runoff and does not impact on developments upstream or downstream of the subject site." **[Our Emphasis]**

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

6.10 National Planning Policy Conclusion

The proposed development seeks to provide Purpose-Built Student Accommodation in a suitable location that is within reasonable walking distance to Third-Level Education Institutions, well serviced by public transport, has efficient and safe infrastructure surrounding the subject site for walking or cycling, and is in close proximity to local services, amenities and facilities. The location of the subject site at the epicentre of Dublin City Centre means that the needs of future students will be met. This site-based regeneration seeks to restore and enhance the Protected Structures on site, respond positively to the surrounding context, and seek to provide an overall enhances public realm and streetscape for members of the public to enjoy.

The proposed 316 No. student bedspaces will contribute to the well-needed supply of PBSA in Dublin as the demand for PBSA's currently outstrips the supply. To address this current issue surrounding the supply of PBSA's, the proposed development seeks to fully maximise the potential of the subject site by building upward, creating a high-density style development. The proposed height of up to 9 No. storeys (above basement level) will enable suitable compact growth on a suitable plot of underutilised land in line with the various National Planning Policy documents above.

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

7.0 STATEMENT OF CONSISTENCY – REGIONAL PLANNING POLICY

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

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

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

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

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



Figure 7.1: Regional Assembly Areas of Ireland

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

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

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

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

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

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

The proposed development seeks to provide 316 No. student bedspaces in a suitable location that is in close proximity to various public transport options. The provision of these units will ultimately provide much-needed PBSA, which in turn will relieve some of the pressure the rental sector in Dublin is facing by freeing up residential units that could be used by the rest of the general population.

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

No.	Objective:	How it is Addressed by this Development:	Does it meet the criteria:
1	Sustainable Settlement Patterns	Sustainable and efficient use of underutilised, vacant, infill and brownfield lands in an existing urban area to provide a Student Accommodation scheme which will contribute positively towards addressing the deficit in PBSA. The surrounding area of the subject site is characterised by a variety of uses. The proposed mixed-use development will contribute positively to the mix of uses in the City Centre through the provision of 316 No. student bedspaces and amenity space, 3 No. retail units, a café/restaurant and cultural/community space.	Yes
2	Compact Growth and Urban Regeneration	The proposed development makes better use of an underutilised site which has been vacant and left in despair for over 20 No. years. Currently there is dead frontage along Middle Abbey Street and Prince's Street North which discourages people from traveling through the highly underutilised William's Lane. The refurbishment works to the retained structures and facades, the proposed new build elements, the proposed uses at ground floor, and the landscape and public realm improvements along the laneway will improve the streetscape and attract people towards the site and the newly animated William's Lane. There are a number of longstanding vacant units along Middle Abbey Street, including the	Yes

		subject site, and Lower Abbey Street; however, the surrounding context of the site is undergoing regeneration with redevelopment of underutilised sites evidenced at Motel One at the corner of Middle Abbey Street and Liffey Street (DCC Reg. Ref 3697/17) and future plans to redevelop the adjacent Arnotts site (above and around the department store) as a Hotel (DCC Reg. Ref. 4880/22). Therefore, the proposed redevelopment of the subject site is fully in keeping with the surrounding area. The proposed scheme would see the partial demolition of the structures on site (5,977 sq m), refurbishment works to the Protected Structures, and the construction of a part 1 No. to part 9 No. storey over basement building connecting into the retained structures to provide 316 No. Student Accommodation bedspaces, 3 No. retail units, a café/restaurant, cultural/community space and student amenity space. This creates high-density housing while still providing substantial commercial, cultural/community and amenity spaces, as well as green infrastructure and biodiversity gains at rooftop level. Because of the sites location in proximity to Third-Level Education Institutions and the Luas and bus stops, the proposed density is considered an acceptable form of compact growth.	
3	Rural Communities	N/A – Urban Area	N/A
4	Healthy Communities	The location of the site to high quality public transport options and Third-Level Education Institutions, the proposed level of cycle parking (408 No. spaces), and the zero level of car parking provided creates a healthy environment for students, staff and visitors with less carbon emissions released. A gym is proposed at basement level as part of the proposed student amenity space. This space, which includes a yoga studio, will promote a healthy lifestyle amongst students.	Yes
5	Creative Places	Cultural/community spaces will be provided on-site, providing 644 sq m of floor space. Although an exact end user has not yet been identified, the *Cultural Infrastructure (impact) Assessment* narrows down the use of the space into: 1) a theatre or dance rehearsal space; 2) a	Yes

		dedicated cultural venue; or 3) a fully commercial cultural/natural heritage attraction. These potential uses will facilitate the creativity of people by providing a space for them to express themselves.	
6	Integrated Transport and Land Use	Due to the proximity of the subject site to the O'Connell Street Green Line Luas stop, Abbey Street Red Line Luas stop, and Jervis Red Line Luas Stop, as well as the multitude of bus stops along O'Connell Street, the site is in an appropriate location for development of this type. The central location of the subject site at will provide students with a place to live that is within easy walking distance to Third-Level Education Institutions, such as Trinity College Dublin located c. 550 metres/8-minute walk from the site.	Yes
7	Sustainable Management of Water, Waste and other Environmental	Please see enclosed the *Climate Action, Energy & Sustainability Statement* prepared by OCSC Consulting; *Operational Waste Management Plan* prepared by Enviroguide Consulting; *Resource & Waste Management Plan* prepared by Waterman Moylan Engineering Consultants; *Construction Environmental Management Plan* prepared by AWN; and *Engineering Assessment Report* prepared by Waterman Moylan Engineering Consultants for further details. Sustainable management of energy use, management of water use and waste output are detailed in the accompanying reports. Sustainable modes of transport are encouraged.	Yes
8	Build Climate Resilience	As specified in the *Flood Risk Assessment* carried out by Waterman Moylan Consulting Engineers: "*Through careful design and appropriate mitigation measures the risks and consequences of flooding have been mitigated across the development.*"	Yes
9	Support the Transition to Low Carbon and Clean Energy	The proposed development will be subject to detailed design which prioritises the energy performance of the building. The proposed quantity of bicycle parking (408 No. spaces), as well as providing zero car parking, will contribute encourage active travel as sustainable modes of travelling to	Yes

		destinations. As the subject site is located at the epicentre of public transport in Dublin City Centre, students, visitors and staff will have a plethora of sustainable public transport options, negating the need for private car usage.	
10	Enhanced Green Infrastructure	There is currently no green infrastructure on site due to the hardstanding nature of the current use and a site coverage of approximately 96.35%. The proposed development seeks to provide green roofs, landscaping within the external amenity spaces and planting along William's Lane to improve the green infrastructure on site.	Yes
11	Biodiversity and Natural Heritage	The proposed green roofs, landscaping within the student amenity spaces and planting along William's Lane are employed to ensure there is a net biodiversity gain on the subject site that currently does not provide such green infrastructure. The biodiverse roofs will incorporate wildflower and meadow-type vegetation which will create a rich environment that attracts pollinators, invertebrates, and the fauna that depend on them. Features such as pollinator-friendly plants and invertebrate habitats will be integrated to sustain this ecosystem, fostering biodiversity in an urban setting.	Yes
12	A Strong Economy Supported by Enterprise and Innovation	The proposed development will strengthen the local economy through the provision of 3 No. retail units and a café/restaurant. The development will also see the employment of staff required to run the Student Accommodation. The future students will also likely secure part-time jobs in the local area, contributing further to the local economy.	Yes
	Improve Education Skills and Social Inclusion	Communal spaces will be provided in the form of amenity space for students of the accommodation to utilise and enjoy. There will be a total of 1,834 sq m of amenity space dispersed across basement level, ground floor, fourth floor, fifth floor, sixth floor and eighth floor. These spaces will enable students to interact with each other and provide safe spaces for people to meet one another. The proposed development also seeks to enhance the public realm through the	Yes

13		reimagination of William's Lane. The proposed improvements to the lane would encourage (or no longer discourage) pedestrian movement through the lane. Safe and high-quality Student Accommodation with easy access to their Third-Level Education Institutions will also facilitate improved education skills as students of Independent House will be alleviated of the concern as to where they can stay whilst attending higher education.	
14	Global City Region	N/A – International Connectivity through Ports and Airports.	N/A
15	Enhanced Strategic Connectivity	Currently William's Lane is uninviting and appears unsafe for people to use with little passive surveillance or public lighting. The subject proposal will help to increase footfall in the area by creating an attractive and inviting pedestrian route between Middle Abbey Street, Prince's Street North, Henry Street (via the GPO Arcade) and O'Connell Street. The proposed ground floor uses will also increase passive surveillance along the laneway which will provide a safe environment for people passing by. Furthermore, locating Student Accommodation at the subject site in proximity to Third-Level Education Institutions will improve the connection between where students live and where they study.	Yes
16	Collaboration Platform	The provision of Student Accommodation by private developers will provide Student Accommodation with no requirement for investment by the Government, potentially allowing funds to be utilised elsewhere.	Yes

Overall, as demonstrated throughout this section, the proposed scheme is consistent with the 16 No. Regional Strategic Outcomes of the *Regional Spatial & Economic Strategy (2019-2031).*

7.1.1 Dublin Metropolitan Area Strategic Plan

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

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

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

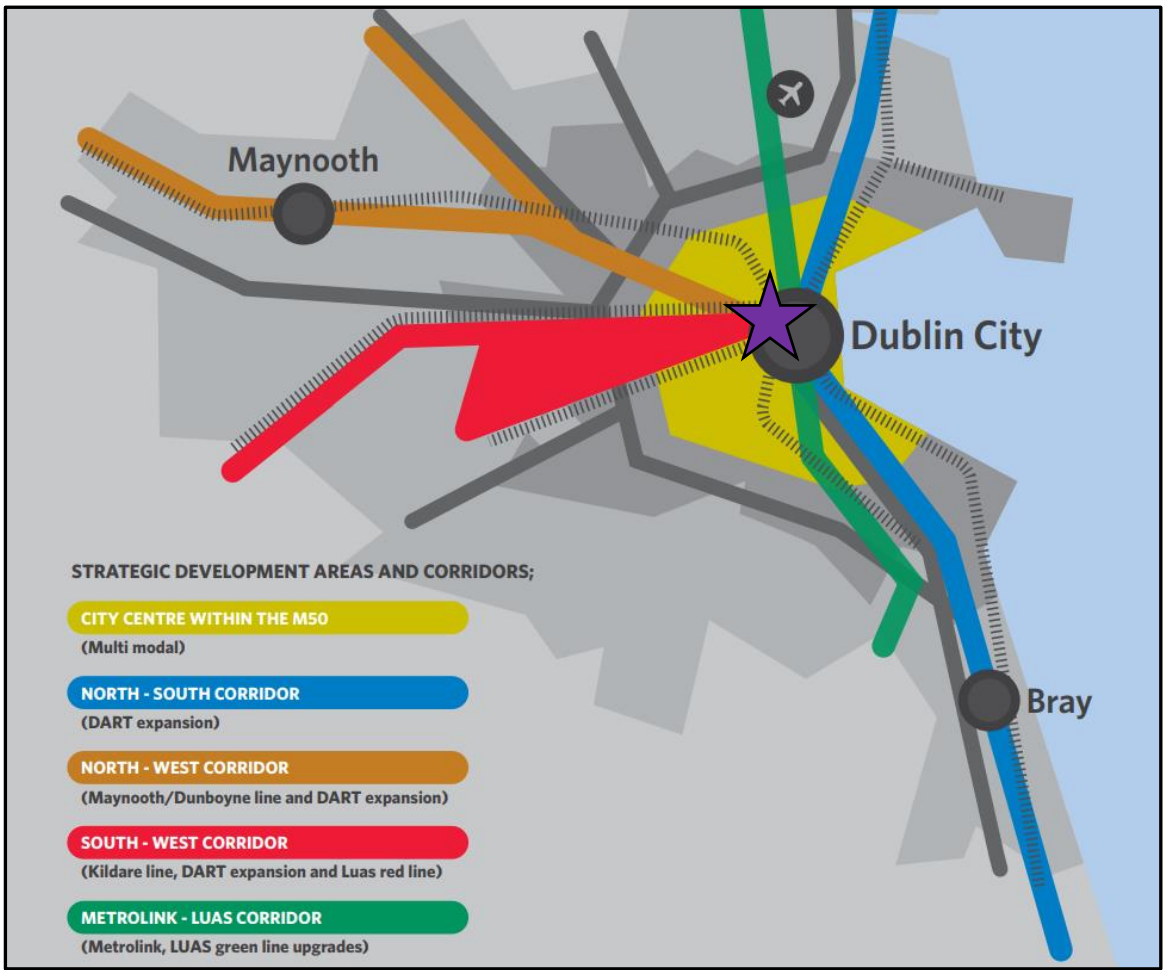


Figure 7.2 Strategic Development Area and Corridors (Indicative Location of the Subject Site Identified by a Purple Star)

(Source: *Regional Spatial and Economic Strategy* (Eastern and Midlands Region), Annotated by Thornton O'Connor Town Planning, 2025)

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

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

The proposed redevelopment of the highly underutilised, vacant site that was previously in use as an office and industrial space for the Independent Newspapers Group, will significantly improve the quality of the built-environment and will provide much needed Student Accommodation within Dublin City Centre along with vibrant and active uses at ground floor level on Middle Abbey Street, William's Lane and Prince's Street North. The proposed development therefore accords with the vision of the 'City Centre within the M50' Corridor set out in the *MASP.*

8.0 STATEMENT OF CONSISTENCY - LOCAL POLICY CONTEXT

This Section will demonstrate that the proposed development has been designed in accordance with Local Policy and with due regard to the objectives and guidance as set out within the *Dublin City Development Plan 2022-2028* ('*Development Plan*'), which is the statutory plan for the area and guides development relating to the subject site.

8.1 Zoning – 'Z5'

The subject site is zoned 'Z5 – City Centre' where the objective is "*To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity.*".



Figure 8.1: DCC Zoning Map E with the Subject Site Indicatively Outlined in Yellow

(Source: *Dublin City Development Plan 2022-2028*, annotated by Thornton O'Connor Town Planning, 2025)

In relation to 'Z5' areas, the *Development Plan* states that:

> *"The primary purpose of this use zone is to sustain life within the centre of the city through intensive mixed-use development (see also Chapters 6, 7, and 15 for policies, objectives and standards). The strategy is to provide a dynamic mix of uses which interact with each other, help create a sense of community, and which sustain the vitality of the inner city both by day and night. As a balance, and in recognition of the growing residential communities in the city centre, adequate noise reduction measures must be incorporated into development, especially mixed-use development, and regard should be given to the hours of operation (see also Chapter 15: Development Standards).*
>
> *Ideally, a mix of uses should occur both vertically through the floors of buildings as well as horizontally along the street frontage. A general mix of uses, e.g. retail, commercial, residential, will be desirable throughout the area and active, vibrant ground floor uses promoted."*

The proposed mixed-use Student Accommodation led development is considered acceptable as Student Accommodation is a permissible use under the 'Z5' zoning, along with cultural/community and multiple retail/commercial uses, a mix of which will be provided at basement and ground floor level. The proposal will create interaction and vibrancy at street level through the proposed active uses at ground floor level.

8.2 Relevant Policies within the *Dublin City Development Plan 2022 – 2028*

8.2.1 Student Accommodation

The Development Plan states the following regarding the provision of Student Accommodation in the city:

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

> "*As identified by the National Student Accommodation Strategy, by developing and utilising an appropriate Management Plan for PBSA, the managers of PBSA can minimise any potential negative impacts from the PBSA developments and their occupants on surrounding properties and neighbourhoods and can create a positive and safe living environment for students and develop and enhance the neighbourhoods in which they are situated for the betterment of the whole community.*"

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

As set out in Section 8.16 of the accompanying *Social Infrastructure Audit* prepared by Turley:

> "*The site falls* ***within 750 m of 13 no. third-level and adult education institutions****. These include Dublin Business School, Trinity College and TUI Dublin.* ***Within 1 km, 10 no. additional third-level and adult education institutions exist****. These include the Royal College Of Physicians Of Ireland, Trinity Business School, Faculty Of Health Sciences, Trinity College and the Centre For Deaf Studies.* ***Within 2 km, 18 no. additional third-level and adult education institutions exist****. These include the Royal College of Surgeons, the University of Notre Dame, TCD Geochemistry, TUI Grangegorman Main Campus, the National College of Ireland and the National College of Art and Design*." **[Our Emphasis]**

As discussed in Section 3.0 of this Report, despite there being a strong demand for PBSA, there is a significant lack of such to cater for the growing student population, especially in Dublin City where there is a large quantum of the country's Third-Level Education Institutions. The subject site is located within a 2-kilometre radius of 41 No. 'third-level and adult education institutions', demonstrating the suitability of the site to provide much needed PBSA in Dublin.

The subject site is also located in close proximity to a multitude of public transport options for future students at the site to travel easily and frequently in and around the City Centre to additional Third-Level Education Institutions not identified in the *Social Infrastructure Audit*. Therefore, it is considered that the proposed development for Student Accommodation is wholly in accordance with the requirements set out in Policy QHSN45 of the *Development Plan.*

Overconcentration of Student Accommodation

The following Policy of the *Development Plan* is of relevance regarding the over-proliferation of Student Accommodation developments:

Policy	***Build to Rent / Student Accommodation / Co-living Development***
QHSN44	*"It is the policy of DCC to avoid the proliferation and concentration of clusters of build to rent/student accommodation/co-living development in any area of the city."*

In assessing proposals for Student Accommodation, Section 15.13.1.1 of the *Development Plan* states that:

> *"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 1km of a proposal."*

Thornton O'Connor Town Planning has undertaken an analysis of the existing, proposed and under construction Student Accommodation development within a 1-kilometre radius of the subject site, the findings of which are illustrated in Figure 8.2 and presented in Table 8.1. As of April 2025 (when this analysis was undertaken), there are 10 No. existing Student Accommodations[12] and 3 No. small-scale Student Accommodation planning applications which are either pending a decision or have been Granted Permission but not yet commenced construction. The 13 No. existing, future and proposed Student Accommodations provide c. 3,404 No. student bedspaces[13].

Whilst there is a large number of student bedspaces within the 1-kilometre radius, c. 900 No. of these are located on Trinity College Campus and Goldsmith Hall (owned and operated by Trinity College). Given the large quantum of 'third-level and adult education institutions' within the 1-kilometre radius of the site (23 No. according to the *Social Infrastructure Audit*), c. 3,404 No.

[12] Some individual townhouses and apartments were identified as providing student accommodation bedspaces; however, these were not included in the overconcentration analysis due their immaterial contribution to the overall quantum of bedspaces. Operators such as International Student Accommodation and Leevin Ireland provide such units.

[13] The number of bedspaces in existing student accommodation was estimated based on available online sources such as Dublin City Council Online Planning Register and any operator websites.

bedspaces, in our opinion, is insufficient to cater for students attending these institutions who need a place to live.

Despite the subject site's central location in Dublin City Centre, where a large number of Third-Level Education Institutions are located, there are only 2 No. other known Student Accommodations within c. 500 metres of the subject site, one of which is part of the on-campus accommodation at Trinity College.

Having regard to the number of existing, future and proposed Student Accommodations, and their associated quantum of bedspaces provided, in proportion to the multitude of Third-Level Education Institutions located within the same area, Thornton O'Connor Town Planning are of the opinion that there is not an overconcentration of Student Accommodation within a 1-kilometre radius of the subject site, and in fact, there is the possibility of an undersupply of such use. Therefore, the provision of 316 No. student bedspaces as part of the proposed Mixed-Use Student Accommodation Development at Independent House is acceptable and in accordance with Policy QHSN44 and Section 15.13.1.1 of the *Development Plan.*

We further note the Planner's Report accompanying the LRD Opinion issued as part of this proposal which highlights that the subject site is appropriate to provide Student Accommodation:

> "*It is also considered an* ***excellent location to provide student accommodation*** *in terms of accessibility positioned so centrally within the city centre proximate to city centre campuses such as Trinity College, the technical universities and close to public transport links.*
>
> *In terms of the concentration of existing student accommodation it is noted that the presence of only 2 other known student accommodations are within c. 500metres from the subject site, where one of which is part of the on-campus accommodation at Trinity College.* ***There would not be an over concentration of student accommodation within a 1 km radius of the subject site***." **[Our Emphasis]**

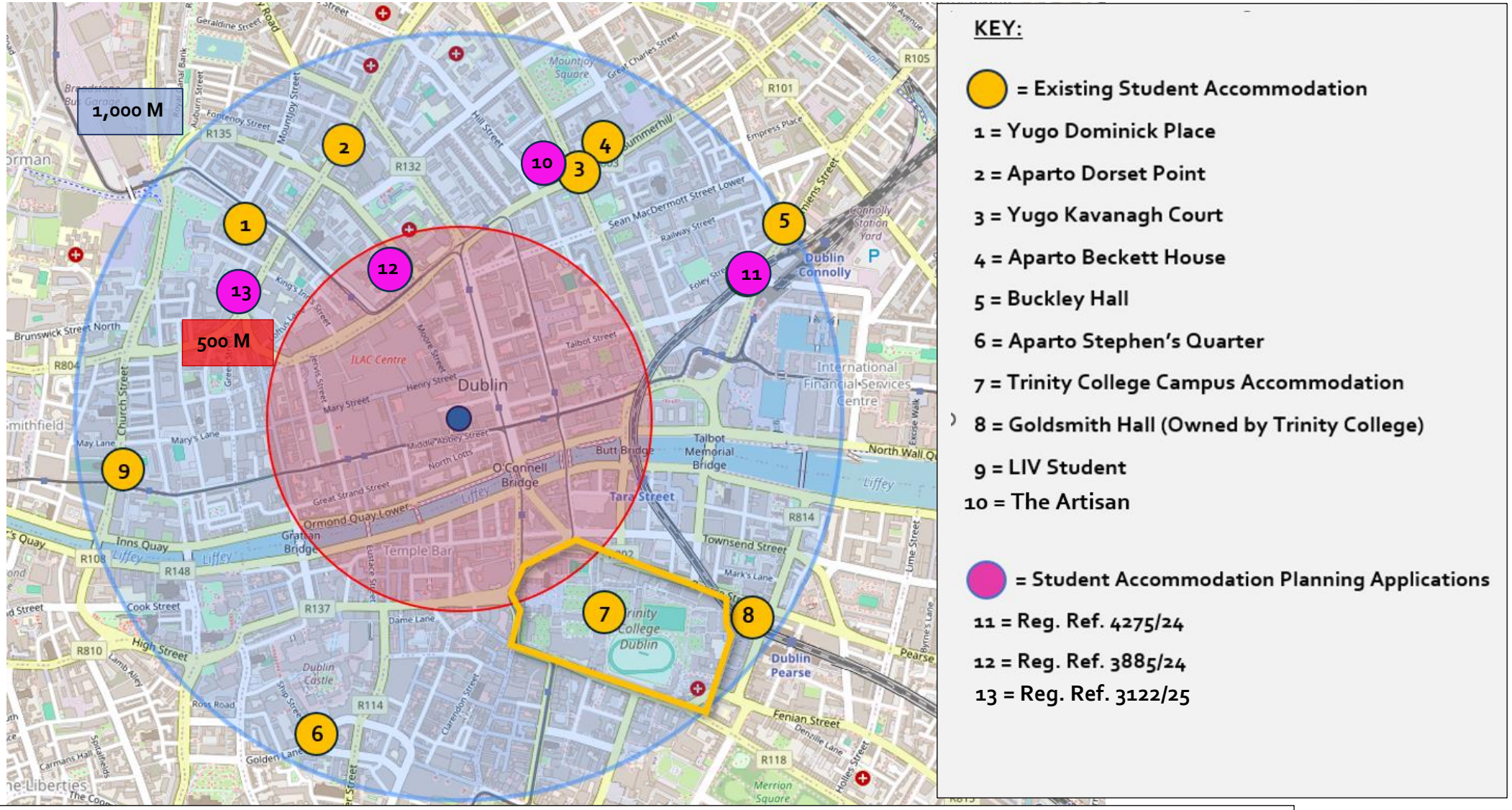


Figure 8.2: Map Showing the Existing, Future and Proposed Student Accommodations (as of April 2025) within a 500-Metre Radius (Red Circle) and 1-Kilometre Radius (Blue Circle) of the Subject Site

(Source: maps.ie and Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)

Map No.	Name	Address	No. of Bedspaces	Approximate Distance from Subject Site[14]
Existing Student Accommodation				
1.	Yugo Dominick Place	No. 58-64 Dominick Street Upper, D07 TEV2	243	790 metres
2.	Aparto Dorset Point	No. 107 Dorset Street Upper, D01 F6F8	447	780 metres
3.	Yugo Kavanagh Court	Gardiner Pl, Mountjoy, D01 V2P9	491	670 metres
4.	Aparto Beckett House	No. 123 Summerhill, Mountjoy, D01 TY46	393	780 metres
5.	Buckley Hall	Nos. 27-30 Buckingham Street Lower, Mountjoy, D01 YA44	106	940 metres
6.	Aparto Stephen's Quarter	No. 6 Stephen Street Upper, Dublin, D08 CH2H	298	890 metres
7.	Trinity College on Campus Accommodation		900+ [15]	450-800 metres
8.	Goldsmith Hall (owned by Trinity College)	No. 2 Westland Row, Dublin 2		1,000 metres
9.	LIV Student Dublin	Nos. 27-31 Church St, D07 RR82	216	850 metres
10.	The Artisan	Nos. 124 – 126 Parnell Street, Dublin 1, D01 F3C4	249	620 metres
Proposed/Permitted Student Accommodation Developments				
11.	Reg. Ref. 4275/24	Nos. 47-48 Talbot Street, Dublin 1, D01 H798	11	800 metres
12.	Reg. Ref. 3885/24	No. 56 Parnell Square West, Dublin, D01 K8Y8	19	400 metres
13.	Reg. Ref. 3122/25	Rear of Edel House, Nos. 51/52 Bolton Street, Dublin 1	31	600 metres
Total Bedspaces within 1Km = Approximately 3,404 No. Bedspaces				

Table 8.1: Quantity and Location of Student Accommodation within a 1km Radius of the Subject Site

(Source: Thornton O'Connor Town Planning, 2025)

[14] Measured distance is 'as the crow flies'.

[15] This is the only figure available via the Trinity College website: www.tcd.ie/accommodation

Unit Mix

Section 15.13.1.1 of the *Development Plan* describes Student Accommodation to be of:

> *"a 'cluster' type model comprising of a group of bedrooms and a shared kitchen / living/ dining space. A minimum of 3 bed spaces with an overall minimum gross floor area of 55 sq. m. up to a maximum of 8 bed spaces and a maximum gross floor area of 160 sq. m. shall be provided in any 'cluster' of student accommodation units….Bathrooms must be provided en-suite within each bedroom unit…. An alternative 'studio' model may also be considered in certain circumstances within a larger student accommodation scheme. These studio units can accommodate single or double occupancy and shall comprise of en-suite bathroom facilities and private kitchenettes/cooking facilities. These studio units shall provide a minimum of 25 sq. m. and a maximum gross floor area of 35 sq. m."*

Minimum bedroom sizes for Student Accommodation clusters are as the following:

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

The proposed development will see the delivery of 267 No. standard rooms, 5 No. accessible rooms, 30 No. single occupancy and standard studios, 10 No. accessible studios and 2 No. twin studios. Each standard room will be a minimum of 12 sq m and each accessible room and studio type will be a minimum of 25 sq m. All bedrooms will have their own en-suite. The proposed cluster type will range is 5 No. students to 8 No. students per cluster (excluding 7 No. student clusters) and varies per floor level, as illustrated in Figure 8.3.

CLUSTER AREA SCHEDULE			
FLOOR	Cluster Name	Area (m2)	Capacity (person)
BASEMENT			
GROUND			
FIRST	A 0101	151	6
	A 0102	32	1
	A 0103	146	6
	A 0104	132	5
	A 0105	30	1
	A 0106	167	8
	A 0107	26	1
	B 0101	168	8
	B 0102	136	5
	C 0101	134	6
	C 0102	26	1
	C 0103	26	1
	C 0104	28	1
	C 0105	27	1
	C 0106	25	1
	C 0107	35	2
SECOND	A 0201	151	6
	A 0202	32	1
	A 0203	142	6
	A 0204	131	5
	A 0205	30	1
	A 0206	167	8
	A 0207	25	1
	B 0201	168	8
	B 0202	139	5
	C 0201	134	6
	C 0202	26	1
	C 0203	26	1
	C 0204	28	1
	C 0205	25	1
	C 0206	27	1
	C 0207	35	2
	C 0208	28	1
THIRD	A 0301	151	6
	A 0302	32	1
	A 0303	142	6
	A 0304	131	5
	A 0305	30	1
	A 0306	168	8
	A 0307	25	1
	B 0301	168	8
	B 0302	139	5
	C 0301	134	6
	C 0302	26	1
	C 0303	26	1
	C 0304	27	1
	C 0305	26	1
	C 0306	29	1
	C 0307	35	2
	C 0308	27	1

CLUSTER AREA SCHEDULE			
FLOOR	Cluster Name	Area (m2)	Capacity (person)
FOURTH	A 0401	151	6
	A 0402	32	1
	A 0403	142	6
	A 0404	131	5
	A 0405	30	1
	A 0406	168	8
	A 0407	25	1
	B 0401	168	8
	B 0402	142	5
	C 0401	134	6
	C 0404	33	1
	C 0405	29	1
	C 0406	30	1
FIFTH	A 0501	151	6
	A 0502	32	1
	A 0503	146	6
	A 0504	132	5
	A 0505	30	1
	A 0506	168	8
	A 0507	25	1
	B 0501	168	8
	B 0502	25	1
	B 0503	32	1
	C 0501	134	6
SIXTH	A 0603	34	1
	A 0604	189	8
	A 0605	26	1
	A 0607	168	8
	B 0601	168	8
	C 0601	134	6
SEVENTH	A 0702	34	1
	A 0704	132	5
	A 0705	29	1
	A 0707	168	8
	B 0701	168	8
	C 0701	134	6
TOTAL	0	7561	319

Figure 8.3: Cluster & Studio Area Schedule

(Source: *Schedule of Accommodation*, Henry J Lyons, 2025)

We note that some of the clusters exceed the maximum gross floor area of 160 sq m with the exceedance being as a result of the circulation space of the clusters, the fact that the standard bedrooms are slightly bigger than the minimum standards, due to the fact that the larger accessible rooms are provided in clusters for integration, and the location of some of the clusters within the retained Independent House and Emerald Chambers. The larger clusters are considered a positive element of the subject scheme.

Daylight and Sunlight

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

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

In regard to the proposed development, the accompanying *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau demonstrates that c. 95% of the scheme complies with the BR 209 Criteria for Spatial Daylight Autonomy (with and without trees included) and c. 80% complies with the BR 209 Criteria for Sunlight Exposure (with and without trees included). The following conclusion is made within the *Daylight and Sunlight Assessment Report*:

> "*The scheme performance assessment for this report has quantified the level of daylight and sunlight within the proposed development.*
>
> *Notwithstanding the relatively small number of rooms that have not achieved the recommended levels of daylight and sunlight access, the overall provision of daylight and sunlight in the proposed development is commendable, particularly given the highly constrained nature of the site.*
>
> *Additionally, the development offers strong sunlight access in its exterior amenity areas, including multiple roof terraces with excellent sunlight potential.*
>
> *In conclusion, urban regeneration in the heart of the capital is challenging to achieve without some degree of non-compliance with the BRE Guidelines for daylight and sunlight. However, the proposed development strikes a favourable balance, performing well in both overall scheme quality and its impact on neighbouring properties. This sustainable design makes effective use of an underutilized city-centre site*."

Communal Facilities

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

Communal Requirement	Area
Indoor / Outdoor	5-7 sq m per bedspace
Kitchen / Living / Dining	4 sq m per bedspace
Total	9-13[16] sq m per bedspace

The proposed development seeks to include 1,834 sq m of communal amenity space. This will be provided through 1,211 sq m (66%) of internal amenity space and 623 sq m (34%) of external amenity space. The following table demonstrates the area of the amenity space and at what floor level it will be located:

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

Floor	Internal (sq m)	External (sq m)
Basement	377	31
Ground Floor	654	0
First Floor	36	0
Fourth Floor	93	0
Fifth Floor	0	70
Sixth Floor	0	118
Eighth Floor	51	404
Total	1,211	623
Overall Total	**1,834 sq m**	

Table 8.2: Proposed Internal and External Student Amenity Space

(Source: Henry J Lyons, 2025)

The proposed development provides 1,834 sq m of combined internal and external communal space, equating to 5.8 sq m of communal space per bedspace, as well as exceeding the minimum requirement of 4 sq m per bedspace of kitchen / living / dining space in each cluster and studio. Please refer to the *Housing Quality Assessment* prepared by Henry J Lyons for further details. This brings the total communal space for the proposed development to a minimum of 9.8 sq m per bedspace, which is fully in accordance with the requirements of the *Development Plan.*

Car Parking / Bicycle Parking

Section 15.13.1.4 of the *Development Plan* states that car parking provision will not be supported in Student Accommodation developments within Dublin City. As stated in Appendix 5 of the *Development Plan:*

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

The proposed development seeks to utilise the nearby public transport options as well as to promote cycling and walking rather than using personal cars. In order to reduce carbon emissions both on-site and in the surrounding area, the proposed development will not provide any car parking spaces. The provision of zero car parking is considered acceptable as students will be attending various Third-Level Education Institutions that are located within a short walking distance from the subject site, Luas stops, and bus stops, and students will be able to cycle or walk to nearby facilities and services located in the vicinity. This also applies to staff of the retail units, café/restaurant and Student Accommodation.

Table 1 in Appendix 5 of the *Development Plan* sets out the bicycle parking standards for Student Accommodation whereby 1 No. long-term space per bedroom and 1 No. short-term space per 5 No. bedrooms is required. Based on the provision of 272 No. student bedrooms and 42 No. studios, the proposed development would generate a requirement of 314 No. long-term spaces and 63 No. short-term spaces to cater for the Student Accommodation.

The proposed development will provide 408 No. bicycle spaces. Out of this total, there will be 320 No. long-term spaces dedicated to residents of the Student Accommodation and will be located within a bike store at basement level. Another bike store is provided at basement level and will cater for 64 No. short-term spaces for visitors of the Student Accommodation. The

remaining 24 No. spaces are to cater for the retail units, café/restaurant unit, cultural/community use, and staff of the Student Accommodation.

Students and staff of the accommodation will be the only people with access to the basement bike stores and any visitors will need a student to let them in. Access to the bike stores is via a dedicated bicycle lift and staircase located within the western portion of the building along William's Lane.

The access arrangements to the bicycle store at basement level has been designed to be universally accessible. The bicycle lift has been sized appropriately to accommodate universally designed vehicles and the lobby to the lift has been designed so that a universally designed vehicle can manoeuvre from William's Lane to the designated bike store.

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

8.2.2 Residential Development

The proposed mixed-use residential development will consist of 316 No. Student Accommodation bedspaces on suitably zoned land for regeneration. The following policies and objectives in the *Development Plan* are of most relevance to the proposed development:

Objective / Policy	It is an Objective / the Policy of Dublin City Council:
CSO7	**Promote Delivery of Residential Development and Compact Growth** *"To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas."*
QHSN10	**Urban Density** *"To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area."*
SC11	**Compact Growth** *"In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:* • *enhance the urban form and spatial structure of the city;* • *be appropriate to their context and respect the established character of the area;* • *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;* • *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;* • *and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture."*

SC12	**Housing Mix** "*To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive*."
SC13	**Green Infrastructure** "*To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces*."
QHSN11	**15-Minute City** "*To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible*."

The proposed development is located within land zoned as 'Z5' where the objective is "*To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity*". In this regard, the principle of development of regenerating an underutilised site and restoring and upgrading the Protected Structures at Independent House to provide 316 No. Student Accommodation bedspaces is considered fully compliant with Objective CSO7.

The proposed scheme seeks to provide an increased density in an appropriate location adjacent to a range of services and facilities. The scheme will result in a high-quality architectural design, which has been informed by the surrounding existing context, and appropriately densifying an underutilised, vacant, infill and brownfield site. The subject scheme has been designed to ensure limited impact on the amenity of surrounding properties, acknowledging that the site is located within the core area of Dublin City Centre where some impacts will occur.

The design of the proposed scheme has been extensively considered with regard to the surrounding context. The area surrounding the subject site is under intense regeneration with the character subsequently moving from former industrial land to mixed-use residential, albeit principally apartment developments rather than units of multiple occupation. In response to the redevelopment and enhancement of sites in the surrounding area, the proposed scheme seeks to provide well-designed and high-quality architecture that will integrate well with the mix of uses nearby. The proposed Student Accommodation will contribute to the mix of uses in the area and provide a different housing mix in the area in accordance with Policy SC12.

Private communal amenity space will be provided for students of the accommodation to enjoy, as well as public realm improvements along William's Lane. The proposed planting and landscaping along William's Lane, the external student amenity space, and the numerous green roofs will provide new biodiversity and visual amenity to the site. This will provide a vast range of green infrastructure and biodiversity on site where there is currently little to no such elements fully in accordance with Policy SC13. The provision of communal amenity space will allow students to interact with each other, creating a sense of place for them to socialise. The public realm enhancements along William's Lane will also provide a space for members of the public to socialise or relax.

The concept of the 15-minute city is highly relevant to the proposed development as the scheme has been designed to a high standard, incorporating a sense of healthy placemaking through the provision of accessible, safe and inclusive spaces. The location of the subject site in the core of Dublin City Centre offers students, staff and visitors of the proposed development with numerous high-quality public transport options (Luas & bus stops and train stations) and active travel infrastructure. The central location of the site provides easy access to a multitude of locations and destinations frequently. The proposed development is therefore considered relevant under the concept of Policy QHSN11.

8.2.3 Regeneration

Section 15.5.1 of the *Development Plan* sets out the following considerations to be incorporated into large-scale, regeneration, brownfield developments:

- *"To encourage innovative, high quality urban design and architectural detail in all new development proposals.*
- *To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.*
- *To respect and enhance existing natural features of interest.*
- *To contribute to the streetscape creating active and vibrant public realm.*
- *To create animation and create activity at street level and vertically throughout the building.*
- *To provide for appropriate materials and finishes in the context of the surrounding buildings.*
- *To ensure land contamination is appropriately dealt with and mitigated against.*
- *To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.*
- *To create new compositions and points of interest.*
- *To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area.*
- *To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.*
- *To prioritise pedestrian and cycle movements in connection with public transport infrastructure.*
- *To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes.*
- *To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.*
  Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood."

Furthermore, Policy CEE20 of the *Development Plan* seeks to address the re-use of existing buildings:

Policy	It is the Policy of Dublin City Council:
CEE20	**Vacant Sites** *(i) "To engage in the 'active land management' of vacant sites and properties including those owned by Dublin City Council.*

	(ii) To engage proactively with land-owners, potential developers and investors with the objective of encouraging the early and high quality re development of such vacant sites. *(iii) To encourage and facilitate the rehabilitation and use of vacant and under-utilised buildings, including their upper floors.* *(iv) To promote and facilitate the use, including the temporary use, of vacant commercial space and vacant sites, for a wide range of enterprise including cultural uses."*

The proposed large-scale development at Independent House seeks to regenerate the brownfield site that has been left vacant for over 20 No. years, bring life and a viable use back into degraded Protected Structures and has been designed to incorporate the measures set out in Section 15.5.1, which is demonstrated in the accompanying application documentation. In summary, the scheme:

- Has a high quality architectural design;
- Is in keeping with the character of the surrounding area which has undergone, and is continuing to undergo, regeneration of vacant or underutilised sites;
- Creates a new streetscape along William's Lane and restores and enhances the existing façade along Middle Abbey Street and part of the façade along Prince's Street North;
- Proposes active uses at ground floor level through the provision of 3 No. retail units and a café/restaurant, as well as the provision of 644 sq m of cultural/community space at basement and ground floor level;
- Proposes public realm improvements along William's Lane to create a vibrant and active laneway which will encourage more footfall to the area and increase the level of connectivity into the surrounding streets;
- Incorporates appropriate materials to respect and enhance the Protected Structures;
- Includes a mix of uses such as retail, café/restaurant, cultural/community, and Student Accommodation which in itself comprises student amenity space of various uses; and
- Priorities pedestrian and cycle movement through the provision of 408 No. cycle spaces and a zero-level provision of car parking to encourage walking, cycling and the utilisation of nearby high-quality public transport options.

8.2.4 Density and Building Height

Development management standards and thresholds relating to site coverage, plot ratio and height work in conjunction with each other to define the bulk and scale of a development. This is then articulated and defined to distribute the massing as an appropriate and attractive built form. Generally, when particular site coverage and plot ratio standards are set, they inform the height of a development.

8.2.4.1 Site Coverage and Plot Ratio

The site coverages and plot ratios set by the *Development Plan* is set out in Table 8.3 and are noted as being 'indicative', thereby indicating flexibility with respect to their applicability and should be read in conjunction with other development management parameters.

Parameter	Site Coverage	Plot Ratio
Development Plan	60-90%	2.5-3.0
Proposed Development	91.81%	4.26

Table 8.3: Site Coverage and Plot Ratio of the *Development Plan* and the Proposed Development

(Source: *Dublin City Development Plan 2022-2028* and Henry J Lyons Design Proposal, 2025)

With regard to Site Coverage, we note that the existing buildings cover 96.35% of the subject site, which is already above the *Development Plan's* Site Coverage range of 60-90% for the site. Therefore, it is considered that the proposed reduction in Site Coverage to 91.81% is acceptable.

Whilst the proposed Plot Ratio very slightly exceeds the indicative Plot Ratio guidance, Appendix 3 of the *Development Plan* notes that higher Plot Ratios can be supported in a number of circumstances including the following, which are relevant to the subject site:

1) **Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed.**

Response*:* As discussed throughout this Report, the subject site is located along a high-quality public transport corridor (Luas & buses). There is a plethora of high-quality public transport options in proximity to the subject site which offer frequent and various route services, as listed in Section 2.3 above. The proposed development will provide a mix of uses including retail units, a café/restaurant, cultural/community space and student reception and amenity space at ground floor level (space also provided at basement level) to provide passive surveillance and an increase in footfall to the area, whilst the upper floor levels and part of basement level will provide much needed Student Accommodation bedspaces on this highly underutilised and appropriately located site.

2) **To facilitate comprehensive re-development in areas in need of urban renewal.**

Response*:* There are a number of longstanding vacant units along Middle Abbey Street (including the subject site) and Lower Abbey Street. The surrounding context of the site is under intense regeneration to bring the numerous vacant sites back into a viable use. The redevelopment of underutilised sites evidenced at Motel One at the corner of Middle Abbey Street and Liffey Street (DCC Reg. Ref 3697/17) and future plans to redevelop the adjacent Arnotts site (above and around the department store) as a Hotel (DCC Reg. Ref. 4880/22). The proposed redevelopment of the subject vacant site that was previously in use as an office and industrial space for the Independent Newspapers Group, will significantly improve the quality of the built environment.

3) **To maintain existing streetscape profiles.**

Response*:* Having regard to the requirement to maintain the existing streetscape along Middle Abbey Street through the retention, refurbishment and enhancement of Independent House and Emerald Chambers, the development has sought to increase building height to the rear of the Protected Structures to allow the viable redevelopment of the subject site. This will change the existing streetscape along William's Lane and Prince's Street North; however, the design, scale and rhythm of the built form makes the scheme a highly legible proposition and will significantly improve this stretch of streetscape. The carefully considered fenestration,

enhancement of façade treatments, activation of street frontages and setting back of upper floors all combine to define the scheme's legibility.

We note that there are many examples of Plot Ratios in this area exceeding the indicative guidance, including:

- Motel One Hotel located at the corner of Middle Abbey Street and Liffey Street – permitted Plot Ratio of 5.39;
- Clink I Lár Hostel located at Nos. 35-36 Upper Abbey Street - permitted Plot Ratio of 7.8;
- Hotel Development adjacent to Clink I Lár at Nos. 31-34 Upper Abbey Street – permitted Plot Ratio of 6.46; and
- Jervis Shopping Centre Extension – permitted Plot Ratio of 10.1[17].

Section 2.7 of the *Architectural Design Statement* sets out various uses considered for the existing structures on site, which would also retain the existing Plot Ratio of 2.3. It was found that the retention of some structures on site and the construction of new build elements to provide Student Accommodation with some commercial uses would secure a viable use for the site. The increase in floor area through the new build element, which subsequently increases the Plot Ratio to 4.26, is required if the subject site is ever to be viably redeveloped.

The proposed development, therefore, is considered to be of an appropriate scale and is firmly asserted as being a prime example of a development that capable of providing a high-density scheme whilst respecting and enhancing the architectural heritage of the site. It is supported by policy which seeks to efficiently and sustainably use well-connected and well-serviced land within existing settlements. We also note that the proposed development, at 289 dph, is within the density range of 100 dph to 300 dph prescribed for the subject site in the *Compact Settlement Guidelines*, as demonstrated and calculated in Section 6.8 above.

8.2.4.2 Building Height

The proposed development will consist of part 1 No. storeys to 9 No. storeys as per Figure 8.4 below. This is an increase in height from the existing structures on site that range between 1 No. storeys and part 6 No. storeys. Figures 8.5 & 8.6 provide aerial images of the subject site and surrounding area in its existing and proposed form as well as the proposed development in the context of the permitted adjacent hotel development (Reg. Ref. 4880/22) and the nearby permitted Dublin Central schemes.

[17] We note that the Jervis Shopping Centre site already had a higher Plot Ratio at 8.1.

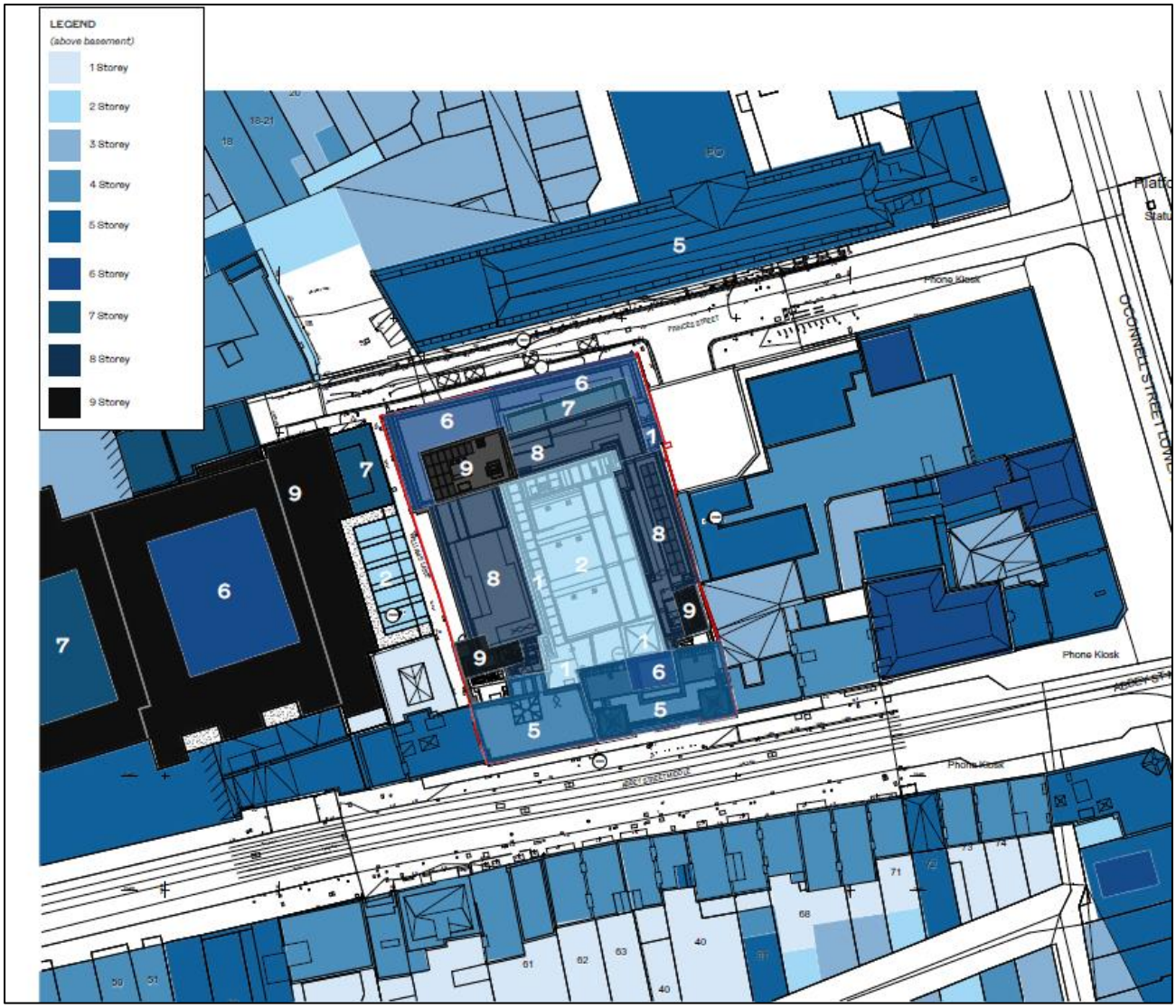


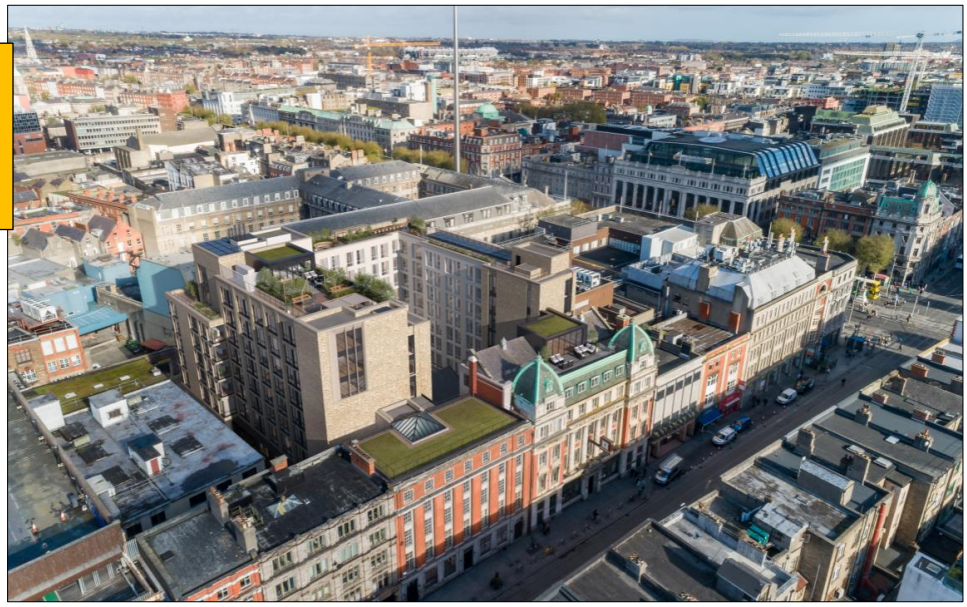
Figure 8.4: **Proposed Building Heights (Including Surrounding Existing/Permitted)**

(Source: ***Architectural Design Statement*** **by Henry J Lyons, 2025)**

1. Existing Context of the Area Surrounding the Subject Site



2. Proposed Development in the Context of the Area Surrounding the Subject Site



3. Proposed Development & Adjacent/Nearby Permitted Development in the Context of the Area Surrounding the Subject Site

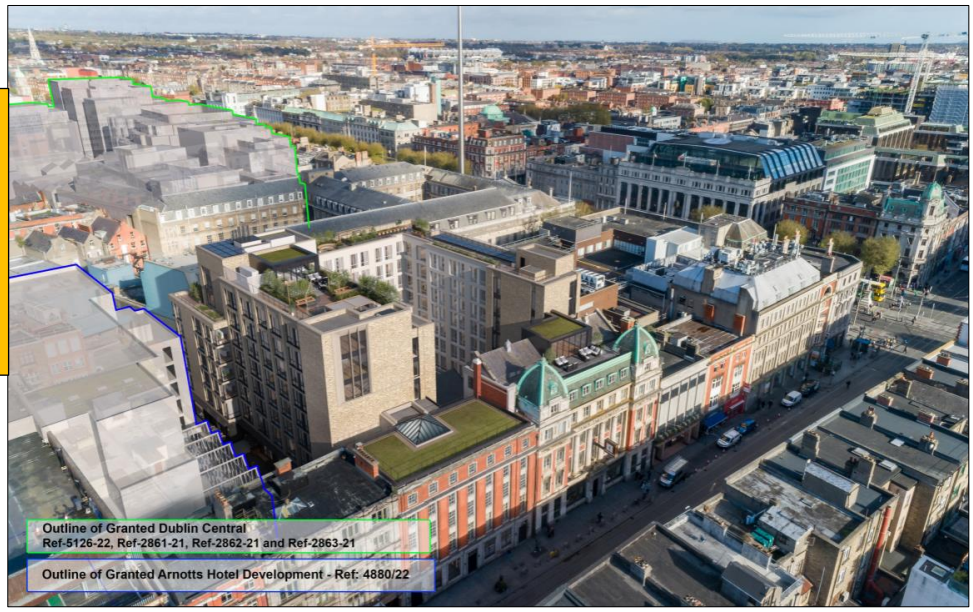
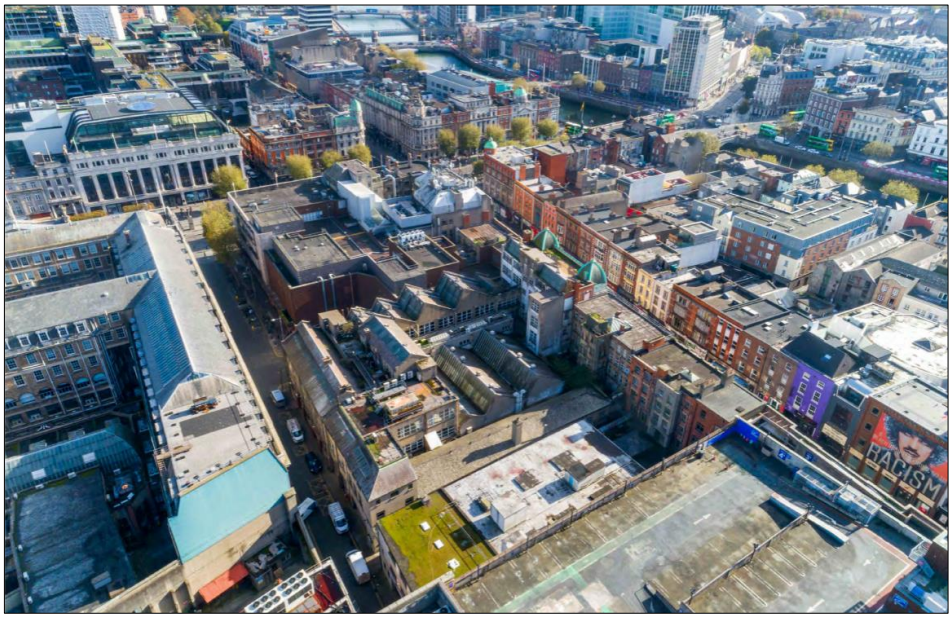


Figure 8.5: Existing & Proposed Height of the Subject Site in the Context of the Surrounding Area (Aerial Image Taken to the South-West of the Subject Site)

(Source: *Aerials, CGIs and Verified Views* by 3D Design Bureau, 2025)

1. Existing Context of the Area Surrounding the Subject Site



2. Proposed Development in the Context of the Area Surrounding the Subject Site



3. Proposed Development & Adjacent Permitted Hotel Development in the Context of the Area Surrounding the Subject Site



Figure 8.6: Existing & Proposed Height of the Subject Site in the Context of the Surrounding Area (Aerial Image Taken to the North-West of the Subject Site)

(Source: *Aerials, CGIs and Verified Views* by 3D Design Bureau, 2025)

The following policies of the *Development Plan* are most relevant regarding the height of buildings in Dublin City:

Policy/ Section	It is the Policy of Dublin City Council:
SC15	**Building Height Uses** "*To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.*"
SC16	**Building Height Locations** *"To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area."*
SC17	**Building Height** "*To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:* • *follow a design led approach;* • *include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3);* • *make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;* • *deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced;* • *Do not affect the safety of aircraft operations at Dublin Airport (including cranage); and* • *have regard to the performance-based criteria set out in Appendix 3.* *All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.*"

Section 4.1 in Appendix 3 of the *Development Plan* details that increased density and height in development are supported in the City Centre and areas close to high frequency public transport options. Section 3.1 in Appendix 3 of the *Development Plan* states that the key determining factors when considering building heights is the need to create exemplar development that provides attractive and legible streets, spaces and public areas, active uses at ground floor level, and appropriate surveillance, whilst ensuring the protection of the amenity of neighbouring properties. Section 3.1 further details the need to protect the historic character of Dublin City when considering building heights:

> "*At a strategic level, Dublin City has an intrinsic quality as a predominantly low rise city. There is a recognised need to protect conservation areas and the architectural character of*

existing buildings, streets and spaces of artistic, civic or historic importance. In particular, development proposals must be sensitive to the historic city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic squares and the canals. It is important to protect the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city and create opportunities for place making and identity. ***Opportunities for height will be promoted*** *on sites identified in section 4 below and* ***in accordance with the performance criteria set out in Tables 3 and 4.*** **[Our Emphasis]**

Similarly, Section 4.1 states that:

"*As a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below.* ***Greater heights may be considered in certain circumstances depending on the site's location and context and subject to assessment against the performance based criteria set out in Table 3.***" **[Our Emphasis]**

The *Development Plan* reflects National Policy in respect of building height as detailed in the *Building Height Guidelines.* The *Development Plan* has sought to accommodate a more flexible and pragmatic approach to the attainment of height given its recency and having been directed by SPPR1 of the *Building Height Guidelines*, which states:

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

In accordance with SPPR1, the *Development Plan* identified a series of areas within which additional height would be supported, with 'City Centre and within the Canal Ring (inner suburbs)' and 'Public Transport Corridors' considered to be applicable to the subject site. Accordingly, the *Development Plan* prescribes a series 10 No. objectives and associated criteria in Table 3 of Appendix 3 whereby proposals for developments of increased height and density must demonstrate how they will comply with such objectives and criteria.

In accordance with Policy SC16 & SC17 and Sections 3.1 and 4.1 of Appendix 3, the proposed development has been assessed against the 10 No. objectives and criteria set out in Table 3 of Appendix 3 and is presented in the following table:

Objective	Criteria	Proposed Development
1 - To promote development with a sense of place and character	Respect and / or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints.	The proposed development has been designed to the highest quality to respond positively to the surrounding area, including the sensitivities of the receiving environment. The proposed scheme seeks to integrate contextually within its immediate surroundings by providing buildings of similar heights and scale of recently constructed / permitted development, whilst limiting the visual impact to the Protected

		Structures at the site and surrounding sensitive environment. Specifically, the three small areas that expand to 9 No. storeys reflects the height of the adjacent Hotel Development permitted at the Arnott's site. We note that a greater portion of the adjacent Hotel Development, as illustrated in Figure 8.4 above, extends to 9 No. storeys, whereas the proposed 9 No. storey elements of the building is limited in terms of floor space and is necessary to provide internal student amenity space, plant and to facilitate access to the eighth-floor student amenity terrace and rooftop plant. The gross floor area permitted for the Hotel Development was 11,438 sq m and the eighth floor (9 No. storeys) represents c. 21.7% of the total gross floor area at 2,481.8 sq m. The 9 No. storey element of the proposed development will only provide 230 sq m of gross floor space, which represents c. 1.49% of the total gross floor space of the proposed development and is significantly less than that permitted for the adjacent Hotel Development. The proposed modulation in height contributes to a broken and dynamic skyline with the various range in heights along Middle Abbey Street and reduces the perceived bulk of the buildings. This subsequently avoids blanket building extensions which can result in a monotonous urban realm. The accompanying *Townscape and Visual Impact Assessment* assessed the townscape and visual impact of the proposed development and its height on nearby sensitive receptors. The Assessment concluded that there would be "***no negative effect on any of the local sensitive receptors*** *such as the GPO, the O'Connell Street ACA, the Moore Street National Monument, or the many protected structures on Middle Abbey Street and elsewhere in the vicinity.*" **[Our Emphasis]** It was further concluded that in terms of the impact of the proposed development on the receiving character, environmental quality,

		visual amenity and function (especially in relation to pedestrian permeability and activity), the townscape impact would, in fact, be "*overwhelmingly positive*". The approach to the design has clearly sought to respond to the surrounding heights of recently permitted/constructed developments and respect the nearby sensitive receptors.
	Have a positive impact on the local community and environment and contribute to 'healthy placemaking'.	The subject site's longstanding vacancy has created a stretch of dead frontage to the front of the site along Middle Abbey Street, with all ground floor windows boarded up. Currently William's Lane and Prince's Street North are uninviting and lacks activation and passive surveillance. The proposed development will have a positive impact on the local community via the public realm improvements along William's Lane and the various façade treatments and enhancements to the existing site frontage along Middle Abbey Street and part of Prince's Street North. The ground floor retail units and café/restaurant will create an active frontage on all sides of the building. The development also provides a cultural/ community space that will be available to the local community. The proposed scheme incorporates a sense of healthy placemaking through the provision of accessible, safe and inclusive spaces within the proposed building and along the re-imagined William's Lane. The proposed development will result in the redevelopment and regeneration of a highly underutilised and vacant site, thereby enhancing the public realm and healthy placemaking through the creation of a more attractive and desirable environment.
	Create a distinctive design and add to and enhance the quality design of the area.	The proposed design is detailed in Henry J Lyons accompanying documentation. The development will significantly improve the built-form and design at the site which has experienced deterioration throughout the years due to its long-standing vacancy. The carefully designed, shaped and modulated

		development creates an attractive proposition at this central site in Dublin City Centre. As concluded in the accompanying *Townscape and Visual Impact Assessment*, the design of the scheme "*represents a carefully considered response to both the opportunity presented by the site and the many sensitivities in the area*" and that the immediate environs, specifically Prince's Street North and William's Lane which are both currently in poor condition, "*would benefit significantly from the proposed development*".
	Be appropriately located in highly accessible places of greater activity and land use intensity.	The subject site is located at the core of Dublin City Centre where a plethora of public transport options and active infrastructure is available (see Section 2.3 above). This includes the O'Connell Street, Jervis, and Abbey Street Luas stops located within a c. 4-6 No. minutes' walk of the site, as well as the abundance of bus stops along O'Connell Street and Lower Abbey Street. The development will, in its own right, increase the activity and land-use intensity at this location by way of its mix of uses and activation of the ground floor level.
	Have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area.	Variation in height, scale and form have been detailed in response to the first criterion above. The approach has sought to respond to the surrounding existing and permitted building heights, with developments granted permission for up to 9 No. and 11 No. storeys along the Middle and Upper Abbey Street. Regard has been had to the possible impact of the proposed development on the nearby GPO building which is of significant historic importance. The northern portion of the building provides various setbacks between sixth and eighth floor level. The closest part of the proposed building to the GPO is c. 2.7 metres lower than the maximum height of the GPO. The proposed building then steps back at sixth floor level, where it is generally the same height of the GPO building, before stepping back further at seventh floor level where the height of the building is c. 4 metres

		higher than the GPO and further again at eighth floor level where the height of the building is c. 6.8 metres higher than the GPO. The stepped approach of the buildings heights transitions positively to the adjacent GPO building so as not to cause any overbearing impacts. Notably, the *Townscape and Visual Impact Assessment* concludes that "***the development would have no negative effect on any of the local sensitive receptors such as the GPO***" **[Our Emphasis]**. Furthermore, the *Architectural Heritage Impact Assessment* notes that: "*While the scale of the proposed new buildings on William's Lane and Prince's Street North is large, relative to the existing, the impacts arising are generally respectful of the existing urban context.*" Section 5.1.1 of the *Daylight and Sunlight Assessment Report* also states that: "*The relationship between the proposed development and the GPO was a key consideration in the design of the proposed development. The primary focus of the daylight and sunlight assessment was to ensure a measured approach was taken regarding the potential impact on the GPO.* *It is the opinion of 3DDB that a balance has been achieved in delivering an appropriately dense development that will provide much-needed bedspaces for students within the city centre. Care was taken to minimize any unreasonable impact on neighbouring properties, with particular consideration given to the GPO, due to its historical and cultural significance.*"
	Not be monolithic and should have a well considered design response that avoids long slab blocks.	The proposed development is not monolithic in its design, with no long stretches of block that are not fenestrated or articulated. The proposed buildings have been designed by a highly experienced Design Team, taking into consideration the sensitive character of the surrounding area, and how the proposed building will create new, active frontage on all sides of the building.

		The modulation of the building ensures that the proposed development will break down the mass of the building. The modulation effect breaks up larger elements of the building by providing different materials and textures and re-using and restoring existing historic fabric. Please refer to the *Architectural Design Statement* prepared by Henry J Lyons submitted herewith for more details.
	Ensure that set back floors are appropriately scaled and designed.	The setting back of upper levels is proposed as a means to gradually increase heights, while respecting the surrounding heights and sensitivities of buildings in the area.
2- To provide appropriate legibility	Make a positive contribution to legibility in an area in a cohesive manner.	The improved streetscape along Middle Abbey Street, Prince's Street North and particularly William's Lane will enhance passive surveillance and legibility for the area. The design, scale and rhythm of the built-form makes the scheme a highly legible proposition. Carefully considered fenestration, enhancement of façade treatments, activation of street frontages and setting back of upper floors all combine to define the scheme's legibility. The Design Team have comprehensively considered the scheme layout and modulation in order to ensure that the development improves legibility in the area and will integrate into the surrounding context.
	Reflect and reinforce the role and function of streets and places and enhance permeability.	The narrowness and lack of passive surveillance of the William's Lane lends itself to an oppressive and unwelcoming character. The subject proposal will reinforce the laneway as an attractive and inviting pedestrian route between Middle Abbey Street, Prince's Street North, Henry Street (via the GPO Arcade) and O'Connell Street, through the widening of the laneway, the provision of seating and planting along the laneway, and active ground floor uses and student amenity space which will increase levels of passive surveillance. As stated in the *Architectural Heritage Impact Assessment*, the "*addition of active facades along William's Lane and promoting this historic route as a*

		safe pedestrian connection would be a positive development."
3 - To provide appropriate continuity and enclosure of streets and spaces	Enhance the urban design context for public spaces and key thoroughfares.	William's Lane is an important thoroughfare as a pedestrian link between Henry Street, O'Connell Street and Middle Abbey Street. However, the laneway is seldom used due to its uninviting appearance and lack of passive surveillance. The proposed public realm improvements along William's Lane will enhance the thoroughfare, increase footfall to the area, and undoubtedly transform this part of the City.
	Provide appropriate level of enclosure to streets and spaces.	The proposed development seeks to improve the level of enclosure experienced by William's Lane through setting back the existing building line further eastwards into the subject site, resulting in a wider laneway for a safer pedestrian route and enlivened public realm.
	Not produce canyons of excessive scale and overbearing of streets and spaces.	Although the tallest element of the proposed development is 9 No. storeys (above basement level), it is limited in terms of floor space and is only provided to allow access to the rooftop plant and eighth-floor student amenity terrace and plant. Additionally, the modulation and variation in heights across the building is such that it ranges from 1 No. storeys to 9 No. storeys (above basement). Permissions have been granted for buildings of similar heights and taller to that proposed (adjacent Arnott's Hotel Development and Clink I Lár further west for example). The avoidance of monolithic built-form that fails to connect to the context has been a priority of the Design Team.
	Generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3.	The concept of pursuing a scheme that is perceived as being of human scale has been applied in the design. Heights vary throughout the scheme by way of modulation and setbacks. Therefore, in our opinion, they don't appear excessive or overbearing. The approach to materials, which include the retained facades of Independent House, Emerald Chambers and part of the Prince's Street North façade, make the scheme visually accessible and intriguing. Brick has been selected as the

		predominant street facing material complementing the existing pallet of materials in the surrounding area and promoting durability as well as ensuring a good visual appearance over time.
	Provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.	Due to the narrowness of William's Lane and the dead frontage provided on all sides of the site as a result of the structures long-standing vacancy, there is currently a lack of passive surveillance onto the streets which creates an unwelcoming presence and results in unwanted anti-social behaviour. The proposed development creates a safe public realm with high levels of passive surveillance provided from the ground floor student amenity space within the building and the active frontage provided by the 3 No. retails units and café/restaurant. The proposal to bring the vacant site back into use and the proposed mix of uses will also increase the number of people at, visiting, or passing by the site which will inevitably result in more 'eyes on the street' and a safer environment. There are multiple entrance points along all sides of the building, ensuring a highly enlivened building.
4 - To provide well connected, high quality and active public and communal spaces	Integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport.	The proposed improvements to William's Lane will create a permeable and legible public realm and will experience a significant increase in movement between Middle Abbey Street and Prince's Street and further onto O'Connell Street to the east and Henry Street via the GPO Arcade to the north of the site. The scheme prioritises cyclists by providing 408 No. cycle spaces and a zero-level provision of car parking due to the central location of the site in close proximity to a number of public transport options, services, facilities, amenities and Third-Level Education Institutions.
	Be appropriately scaled and distanced to provide appropriate enclosure / exposure to public and communal spaces, particularly to residential courtyards.	Due to the subject's site limited site area and the need to retain the sawtooth roof of the Printing Hall, it was considered appropriate to provide the external communal amenity space at the fifth, sixth and eighth floor level to feel less enclosed, with additional amenity

		space provided within the basement level courtyard.
	Ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities.	Please see the accompanying *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau for full details of the compliance rates of the proposed development with the BRE 209 and the I.S. EN 17037 Criterion. With regard to the external student amenity space, the *Daylight and Sunlight Assessment Report* concluded that "*the development offers strong sunlight access in its exterior amenity areas, including multiple roof terraces with* ***excellent sunlight potential***." **[Our Emphasis]**
	Ensure the use of the perimeter block is not compromised and that it [is] utilised as an important typology that can include courtyards for residential development.	The perimeter block has been retained in the proposal but with the retention of Protected Structures on site, it has not been possible to provide courtyards at ground level. However, adequate communal amenity space is provided elsewhere throughout the scheme, including a courtyard at basement level.
	Ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated.	The potential for negative microclimatic effects as a result of the proposed development has been assessed in the accompanying *Wind & Microclimate Study* prepared by OCSC. The Report concludes the following: "*A conscious effort was made by the design team during the design stages to mitigate the risk of localised increased wind speed conditions due to the proposed development. The introduction of mitigation measures such as the corridor spaces between buildings, building line, façade protrusions, solid balcony balustrades, as well as the strategic location of extensive landscaping, all assist in reducing the potential development of local increased wind speed and the negative impact on local climatic conditions.* *Based on the CFD modelling results, the proposed development will be a comfortable environment for occupants. Certain areas have been highlighted as experiencing minor discomfort for a limited period of time, such as certain areas at ground floor level. However,*

		these concerns have been largely addressed through the incorporation of detailed landscaping which will mitigate excessive wind speeds in these areas. *Overall,* ***the proposed development may be classified as a high-quality, comfortable environment for occupants throughout the year****."* **[Our Emphasis]**
	Provide for people friendly streets and spaces.	The proposed communal amenity spaces have been designed to encourage integration and socialisation with one another. These spaces are intended to reduce the refinement of students to the bedroom and instead create an inviting space where students can get to know one another, thus creating people friendly spaces. The proposed public realm enhancements at William's Lane will include seating for members of the public or students in the accommodation to use, promoting social interaction between the community.
5- To provide high quality, attractive and useable private spaces	Not compromise the provision of high quality private outdoor space.	This is not considered relevant for, or applicable to, the proposed development as there is no requirement for private amenity space to be provided for in PBSA. Nevertheless, there is 623 sq m of external communal amenity space for students of the accommodation to enjoy.
	Ensure that private space is usable, safe, accessible and inviting.	The contemporary design of the proposed scheme provides for versatile private units with a shared communal living / kitchen / dining room within each cluster as well as some larger studio units. All accessible rooms and studios are fully wheelchair accessible and are located near circulation cores for ease of access. There is sufficient space for disabled users in all circulation spaces and communal areas.
	Ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards.	As detailed in the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau, "*Notwithstanding the relatively small number of rooms that have not achieved the recommended levels of daylight and sunlight access,* ***the overall provision of daylight and sunlight in the proposed development is***

		***commendable, particularly given the highly constrained nature of the site.*" [Our Emphasis]**
	Assess the microclimatic effects to mitigate and avoid negative impacts.	As detailed in the accompanying *Wind & Microclimate Study* prepared by OCSC, "*the proposed development may be classified as a high-quality, comfortable environment for occupants throughout the year.*"
	Retain reasonable levels of overlooking and privacy in residential and mixed-use development.	Inappropriate levels of overlooking have been avoided as part of the proposed development's design, with a balance struck between protecting privacy and residential amenity and ensuring adequate passive surveillance is secured. It is noted that Student Accommodation does not provide balconies which are more overbearing than a bedroom window.
6 - To promote mix of use and diversity of activities	Promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure.	The proposed development is inherently mixed-use in nature given the existing mixed-use character of the surrounding area. Whilst the Student Accommodation is the primary use, retail units, a café/restaurant and cultural/community space are also proposed. The retail units and café/restaurant will serve the development's future students as well as existing and future residents in the area and people working in the City Centre, in support of the '15-minute city' concept.
	Contribute positively to the formation of a 'sustainable urban neighbourhood'.	The proposed Student Accommodation will provide a tenure diversity and mix, with the students bringing a different population cohort into the area, who can work in and utilise the retail facilities provided in the subject application and in the surrounding area, thus contributing positively to the formation of a 'sustainable urban neighbourhood'.
	Include a mix of building and dwelling typologies in the neighbourhood.	As the proposed development is the only Student Accommodation proposed in the immediate area, the scheme will contribute to the mix of building typologies in the surrounding area.
	Provide for residential development, with a range of housing typologies	At a site-specific level, this is not considered relevant for, or applicable to, the proposed development. Nevertheless, there are 10 No.

	suited to different stages of the life cycle.	accessible studios and 5 No. accessible rooms proposed to cater for students with additional needs. These studios and rooms are fully wheelchair accessible and are equipped with large en-suites.
7 - To ensure high quality and environmentally sustainable buildings	Be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light.	The modulation of height, which varies from 1 No. to 9 No. storeys ensures that the proposed development is not monolithic in its built-form, with its scale and massing distributed appropriately. Shifted height and massing allow for natural ventilation to be achieved, with no long and unbroken section of building proposed. Please see the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau for a detailed analysis of daylight and sunlight.
	Not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain.	Please see the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau for a detailed analysis of natural daylight and sunlight. The Report concludes the following: "*It is the opinion of 3DDB that a balance has been achieved in delivering an appropriately dense development that will provide much-needed bedspaces for students within the city centre.* ***Care was taken to minimize any unreasonable impact on neighbouring properties****, with particular consideration given to the GPO, due to its historical and cultural significance.*" **[Our Emphasis]**
	Ensure a degree of physical building adaptability as well as internal flexibility in design and layout.	The proposed retention of, and restoration of, the historic buildings on site will undergo a degree of change to the internal layout to cater for the proposed uses. This includes part of the removal of the existing concrete roof slab at Emerald Chambers to facilitate an increase in floor to ceiling height at fourth floor level and the lowering of part of the ground floor level in Independent House and Emerald Chambers for universal access. Regarding the student bedspaces, a range of options are provided from 5 No. – 8 No. bedspace clusters to studios to accessible rooms.

	Ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive.	Henry J Lyons have sought to minimise rooftop plant and infrastructure, as demonstrated in their submitted architectural materials, as well as the CGIs and Verified Views prepared by 3D Design Bureau and the *Townscape and Visual Impact Assessment* prepared by ModelWorks. The inclusion of parapets or screening hides some of these features. For example, the 2.5-metre high generator within the western extent of the building, at eighth floor level, is suitably enclosed by a 3-metre high mesh screen to the west and south, the student breakout space to the east, and the circulation space for Core A to the north.
	Maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage.	Out of the 42 No. clusters and 42 No. studios (standard, accessible and twin) proposed, 50 No. are dual aspect in their design, equivalent to 60%. Given the requirement for dual aspect units is relaxed for Student Accommodation (as stated in Section 15.13.1.2 of the *Development Plan*), this is a high rate of provision.
	Be constructed of the highest quality materials and robust construction methodologies.	This design principle has been applied in the proposed development. Robust materials that require low maintenance and upkeep will be used. The existing materials and approach to the proposed materials, which include different colours and textures, make the scheme visually accessible and intriguing. As stated in the accompanying *Architectural Heritage Impact Assessment*, "*The new elements have been designed in a contemporary manner, to distinguish them from the retained historic structures. The elevation treatment is restrained and ordered, so as not to detract from the historic façades. The proposed finishes have been carefully selected to complement the existing palette of materials on site.*"
	Incorporate appropriate sustainable technologies, be energy efficient and climate resilient.	Public lighting will be provided from LED fittings which will reduce energy consumption and prolong the life of materials and fixtures. Full details of the intended sustainable technologies, energy efficiencies and climate resilience are

		detailed in the accompanying *Climate Action, Energy and Sustainability Statement* prepared by OCSC.
	Have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sun lighting proposals. Where appropriate, satisfactory, alternative compensatory design solutions should be provided for a failure to meet reasonable daylighting provisions, in the context of a constrained site or securing wider objectives such as comprehensive urban regeneration or an effective urban design and streetscape solution.	Please see the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau for a detailed analysis of daylight and sunlight. In terms of the scheme's performance, the Report concludes: "*Notwithstanding the relatively small number of rooms that have not achieved the recommended levels of daylight and sunlight access,* ***the overall provision of daylight and sunlight in the proposed development is commendable, particularly given the highly constrained nature of the site****.* *Additionally, the development offers strong sunlight access in its exterior amenity areas, including multiple roof terraces with excellent sunlight potential*." **[Our Emphasis]**
	Incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place.	Sustainable Urban Drainage systems (SUDS) and reduction of surface water run-off have been incorporated into the design of the proposed development. The proposed development seeks to provide green and blue roofs on all available flat roof space. Blue roofs will provide attenuation of rainwater at roof level and will reduce the size of the underground storage tank. Green and blue roofs will reduce surface water runoff and encourage biodiversity. It is proposed that the roof water from the development draining to surface level via rainwater downpipes will be connected to a proposed rainwater harvesting tank which can be utilised for reuse within the development. Please refer to the *Engineering Assessment Report* and *Storm Water Management Plan* prepared by Waterman Moylan Consulting Engineers for further details.
	Include a flood risk assessment.	A *Flood Risk Assessment* has been prepared by Waterman Moylan Consulting Engineers and is included under a separate cover. The assessment concluded the following: "*Through careful design and appropriate mitigation measures the risks and*

		consequences of flooding have been mitigated across the development. Surface water runoff from the site is limited to Greenfield runoff and does not impact on developments upstream or downstream of the subject site."
8 - To secure sustainable density, intensity at locations of high accessibility	Be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport.	The subject site is located in a very sustainable location in terms of public transport options as the O'Connell Street, Jervis, and Abbey Street Luas stops are located within a c. 4-6-minute walk from the site, as well a plethora of bus stop with various routes located along O'Connell Street and Abbey Street. Please see Section 2.3 for a list of nearby public transport options. With the high frequency of the Red Line and Green Line Luas and the nearby bus routes made available in proximity to the subject site, the future students occupying the accommodation will be able to access various facilities, services, amenities, and Third-Level Education Institutions, as well as the staff and visitors of the retail units, café/restaurant, Student Accommodation and cultural/community space.
	Look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.	The aim of the proposed development is to make use of an underutilised site to provide high-quality and higher-density accommodation for students. With regard to Site Coverage (building footprint), we note that the existing buildings cover 96.35% of the subject site, which is above the *Development Plan's* Site Coverage range of 60-90% for the site. It is proposed to reduce the Site Coverage to 91.89% to facilitate the widening of William's Lane for public realm improvements. As a higher Site Coverage has already been established on site, it is therefore considered that the proposed Site Coverage is acceptable.
9 - To protect historic environments from insensitive development	Not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and	The accompanying *Architectural Heritage Impact Assessment* concludes: "*Without intervention, this prominent landmark building range will continue to decay as a consequence of the loss of its original purpose and challenges at adaptation.*

	their curtilage and National Monuments.	*The proposed adaptive reuse of the building range is considered a viable strategy to reoccupy the site while simultaneously safeguarding the external character of the early 20th century grouping from its primary ACA viewpoints."* *"It is proposed to respect this special interest and to interweave contemporary forms as a means of reviving a functional use on the site, rendering the development strategy sustainable in terms of its architectural heritage approach."* In terms of impact to the character or setting of the National Monument on Moore Street, the *Townscape and Visual Impact Assessment* notes that "*the development would have no impact on the National Monument*" as the subject development would not be visible from Moore Street (see Viewpoint No. 20).
	Be accompanied by a detailed assessment to establish the sensitives of the existing environment and its capacity to absorb the extent of development proposed.	Please refer to the *Townscape and Visual Impact Assessment* prepared by ModelWorks for a detailed assessment of the impact of the proposed development on the existing sensitive environment.
	Assess potential impacts on keys views and vistas related to the historic environment.	Please refer to the *Townscape and Visual Impact Assessment* prepared by ModelWorks for details of the impact of the proposed development on the identified key views. We note that the assessment concluded that "*the proposal represents a carefully considered response to both the opportunity presented by the site and the many sensitivities in the area. Importantly, the development would have no negative effect on any of the local sensitive receptors such as the GPO, the O'Connell Street ACA, the Moore Street National Monument, or the many protected structures on Middle Abbey Street and elsewhere in the vicinity*."
10 - To ensure appropriate management and maintenance	Include an appropriate management plan to address matters of security, management of public/communal areas,	The following reports have been prepared to guide the maintenance and management of the proposed development at construction and operational stage: • *Operational Waste Management Plan;*

	waste management, servicing etc.	• *Construction Environmental Management Plan;* • *Delivery & Service Management Plan;* • *Bicycle Parking Management Plan;* • *Travel Plan;* • *Storm Water Management Plan;* • *Landscape Design Access Statement; and* • *Student Management Plan* Given the extent of detail included in each, the Council is respectfully directed to read these individually for full details.

Having regard to the above, it is firmly contended that there is strong merit in supporting the principle of part 1 No. to part 9 No. storey (above basement level) building as part of the redevelopment of the subject site. The proposal has sought to provide a development that both adheres to local planning policy and exceed minimum policy requirements whilst also assimilating into its receiving environment and ensuring the protection and enhancement of the Protected Structures and surrounding historic character. It is considered that the design response ensures that the development potential of a strategically positioned underutilised plot is maximised without impacting adversely on the amenity of adjacent properties and the surrounding area.

Having due regard for the policy and objectives set out in the *Development Plan* and *Building Heights Guidelines*, the proposed height of the buildings is considered to be fully acceptable. To reiterate, the conclusion made in the *Townscape and Visual Impact Assessment* is as follows:

> "*In conclusion, the assessment has found that the site is* ***well suited for intensification of land use through increased building height****, as the new built form can be positioned on the site to avoid significant townscape and visual effects except on the immediate environs – specifically Prince's Street North and William's Lane. These elements of the townscape are both currently in poor condition and would benefit significantly from the proposed development.*
>
> *The assessment of the design (in Section 4), and the potential visual effects (in Section 5) indicates that the* ***proposal represents a carefully considered response to both the opportunity presented by the site and the many sensitivities in the area****. Importantly, the development would have no negative effect on any of the local sensitive receptors such as the GPO, the O'Connell Street ACA, the Moore Street National Monument, or the many protected structures on Middle Abbey Street and elsewhere in the vicinity.*
>
> ***The proposed development's effects on the townscape*** *– in terms of its character, environmental quality, visual amenity and function (especially in relation to pedestrian permeability and activity) –* ***would be overwhelmingly positive****."* **[Our Emphasis]**

8.2.5 Conservation & Archaeology

As previously described, the subject buildings are listed as Protected Structures (RPS No. 18 and RPS 8797) in the *Development Plan* as described below:

RPS No.	Address	Description
18	87-90, Abbey Street Middle, Dublin 1	Independent House, including roof and roof pavilions
8797	91-92*, Abbey Street Middle, Dublin 1	Independent House

**We note the Record of Protected Structures has not included No. 93 Middle Abbey Street as part of the building grouping.*

The main subject site is not located within an Architectural Conservation Area (ACA); however, the north-east corner of the site abuts a section of the *O'Connell Street and Environs ACA* along Prince's Street North, as demonstrated in Figure 8.1.

The following policies and objectives in the *Development Plan* are of most relevance to the proposed development:

Objective / Policy	It is an Objective / the Policy of Dublin City Council:
SC22	**Historical Architectural Character** *"To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures."*
BHA2	**Development of Protected Structures** *"That development will conserve and enhance protected structures and their curtilage and will:* *(a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.* *(b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.* *(c) Ensure that works are carried out in line with* ***best conservation practice*** *as advised by a suitably qualified person with expertise in architectural conservation.* *(d) Ensure that* ***any development, modification, alteration, or extension affecting a protected structure and / or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials****.* *(c) Ensure that the* ***form and structural integrity of the protected structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the protected structure****.*

	(d) ***Respect the historic fabric and the special interest of the interior****, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.* *(e) Ensure that* ***new and adapted uses are compatible*** *with the architectural character and special interest(s) of the protected structure.* *(f)* ***Protect and retain important elements of built heritage*** *including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.* *(g) Ensure historic landscapes, gardens and trees (in good condition) associated with protected structures are protected from inappropriate development.* *(h) Have regard to ecological considerations for example, protected of species such as bats."* **[Our Emphasis]**
BHA3	**Loss of Protected Structures** *"That the City Council will resist the total or substantial loss of protected structures in all but exceptional circumstances."*
BHA5	**Demolition of Regional Rated Building on NIAH** *"That there is a presumption against the demolition or substantial loss of any building or other structure assigned a 'Regional' rating or higher by the National Inventory of Architectural Heritage (NIAH), unless it is clearly justified in a written conservation assessment that the building has no special interest and is not suitable for addition to the City Council's Record of Protected Structures (RPS); having regard to the provisions of Section 51, Part IV of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011)."*
BHA6	**Buildings on Historic Maps** *"That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report this it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011)."*
BHA11	**Rehabilitation and Reuse of Existing Older Buildings** *(a) "To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment.* *(b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.* *(c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric."*
BHA15	**Twentieth Century Buildings and Structures** *(a) "To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.*

	(b) To encourage the retention and reinstatement of internal and external features, that contribute to the character of exemplar twentieth century buildings, such as roofscapes, boundary treatments, fenestration pattern, materials, and other features, fixtures and fittings (including furniture and art work), considered worthy of retention." *(c)*
BHA16	**Industrial Heritage** *"To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans and the assessment of planning applications. To review the DCHIR in accordance with Ministerial Recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City."*
BHA18	**Historic Ground Surfaces, Street Furniture and Public Realm** *(a) "To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including stone kerbs, pavement flags and setts, and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character, having regard to the national Advice Series on Paving: The Conservation of Historic Ground Surfaces (2015).* (b) *(b) To maintain schedules of stone setts, historic kerbing and historic pavers/flags, and associated features in the public realm, to be protected, conserved or reintroduced (Appendix 6), and to update and review these schedules during the period of this development plan."*
BHA20	**Ghost Heritage Signs** *"To seek the retention and maintenance of heritage signs and advertising through the city, where appropriate."*
BHA21	**Retrofitting Sustainability Measures** *"To have regard to the Department of Environment, Heritage and Local Government's publication on Energy Efficiency in Traditional Buildings (2010) and the Irish Standard IS EN 16883:2017 Conservation of Cultural Heritage- Guidelines for Improving the Energy Performance of Historic Buildings (2017) and any future updates or advisory documents in assessing proposed works on heritage buildings."*
BHA22	**Upgrading Environmental Performance** *"To ensure a sustainable future for historic and other buildings subject to heritage protection, the City Council will encourage and support works to upgrade the environmental performance of the existing building stock that incorporates good standards of design and appearance. Where these works involve historic buildings subject to protection (this includes buildings referenced on the Record of Protected Structures and non-protected structures in an Architectural Conservation Area), the works shall not adversely affect the special interest of the structure and thus a sensitive approach will be required, taking into account:* • *The significance of the structure, and* • *The extent of intervention, including impact on historic fabric, the technical requirements of a traditionally constructed building, visibility, siting and design.*

	The installation of renewable energy measures and equipment will be acceptable where sited and designed to minimise the visual impact and does not result in any significant loss of historic fabric or otherwise affect the significance of the structure."
BHA24	**Reuse and Refurbishment of Historic Buildings** "*Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making, and by demonstrating best practice in the care and maintenance of historic properties in public ownership*."

All the Policies listed above are responded to in the accompanying *Architectural Heritage Impact Assessment* prepared by Molloy & Associates Conservation Architects. However, we note the following conclusion of the Assessment:

> "*Without intervention, this prominent landmark building range will continue to decay as a consequence of the loss of its original purpose and challenges at adaptation.*
>
> *The proposed adaptive reuse of the building range is considered a viable strategy to reoccupy the site while simultaneously safeguarding the external character of the early 20th century grouping from its primary ACA viewpoints.*
>
> *According to ICOMOS (2010), a successful heritage adaptive reuse project modifies a place or building while retaining its cultural heritage value.*
>
> *The architectural heritage significance of the subject site is multilayered; but primarily related to its architectural contribution to the streetscape, its rarity as a twentieth century industrial space and its cultural and historic significance as the site of the 'Nation' newspaper and later 'Independent Newspapers'.*
>
> *It is proposed to respect this special interest and to interweave contemporary forms as a means of reviving a functional use on the site, rendering the development strategy sustainable in terms of its architectural heritage approach*."

In terms of archaeological importance, the subject site lies within the Dublin City Zone Of Archaeological Potential Ref: DU018-020. As such, the following Sections and Policies of the *Development Plan* are of relevance:

Policy	It is an Objective / the Policy of Dublin City Council:
BHA26	**Archaeological Heritage** 1. "*To protect and preserve Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994 which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.* 2. *To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the*

	construction of light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994. 3. *To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places; all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.* 4. *Development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.* 5. *To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.* 6. *Preserve the character, setting, and amenity of upstanding and below ground town wall defences.* 7. *Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land, shall have regard to the Shipwreck Inventory maintained by the Department of Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment.* 8. *To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland."*

In accordance with Policy BHA26 of the *Development Plan*, an *Archaeological Assessment* has been prepared by IAC Archaeology and submitted herewith. The *Archaeological Assessment* assessed the potential for the survival of archaeological features and the possible impacts of the proposed development on any archaeological features, along with recommendations to mitigate any impact. The following provides the conclusion of the archaeological assessment:

> "*A review of the Excavations Bulletin (1970–2025) has revealed that whilst no previous archaeological investigations have been carried out within the proposed development area, the wider area has been subject to extensive archaeological investigations. These have revealed reclamation deposits extending up to c. 3m in depth, wooden structures associated with the reclamation works and early 18th and 19th century foundations.*
>
> *The development area is located c. 150m east of the important medieval monastic precinct associated with St Marys Abbey, founded in the 12th century. The topographical files held by the National Museum of Ireland record the identification of two masonry walls in 1972 on the western side of Liffey Street, which have been interpreted as potentially representing the outer precinct boundary, c. 150m to the west of the proposed development area.*

Cartographic analysis has shown that the proposed development area was situated in undeveloped estuarine land to the north of the River Liffey until reclamation works were carried out in the 17th/18th centuries. The site contained seven terraced houses from the 18th century onwards, likely to represent residences, with associated gardens and outbuildings. The historic OS maps show that all but one of these buildings possessed a basement level. Following extensive destruction to the O'Connell Street area during the 1916 Rising, reconstruction took place, including the redevelopment of the development area. Emerald Chambers and the rear warehouse were constructed at Nos. 91-93 Middle Abbey Street in 1922, and Independent House in 1924. Between 1936 and 1939 the sites were amalgamated in order to expand the operations of Independent Newspapers. Independent House is recorded on the Dublin City Industrial Heritage Record, due to its association with the historic newsprint industry of the city.

A field inspection has been carried out as part of the assessment and this revealed that an existing basement level exists across the entire development footprint. It is possible that walls associated with the earlier Georgian basements survive within portions of the southern part of the development area, although the limited nature of access (due to Health and Safety considerations) meant that a detailed inspection of same could not be carried out."

Having regard to the archaeological findings, the *Archaeological Assessment* considered the impact of the proposed development on such archaeological features and concluded that the works within the basement level "*have the potential to directly impact any sections of 18th century basement walls, which may survive within the basement*" and that "*any ground works to be carried out have the potential to directly impact any archaeological remains that may survive beneath the existing basement floor*". Accordingly, the following recommendations were made:

"*Prior to the commencement of construction and following the removal of any hazardous material to enable safe access, it is recommended that a detailed archaeological inspection of the southern basement area be carried out and a record made of any sections of walling that may be associated with the original 18th century cellars."*

"*It is recommended that as part of a predevelopment enabling works contract, that archaeological testing be carried out, which is subject to the relevant health and safety procedures and regulations. This should be carried out under licence, as issued by the National Monuments Service of the DoHLGH and in consultation with the Dublin City Archaeologist. Dependent on the results of the assessment further mitigation may be required such as preservation by record, or in-situ and/or archaeological monitoring.*"

As such, although the proposed development may "*have the potential to directly impact*" any archaeological remains at the subject site, the recommendations made by IAC Archaeology in the *Archaeological Assessment* are to "*avoid, prevent, reduce or offset negative effects*"[18].

[18] Definition of the "Potential mitigation strategies for cultural heritage remains" in Appendix 4 of the *Archaeology Assessment* prepared by IAC Archaeology.

8.2.6 Cultural/Community Space

The *Development Plan* sets out a policy in respect of the provision of cultural/community space for developments that are considered Large Scale Developments:

Objective / Policy	It is an Objective / the Policy of Dublin City Council:
CUO25	SDRAs and **Large Scale Developments** "*All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area* must provide at a* ***minimum for 5% community****, arts and* ***culture*** *spaces including exhibition, performance, and artist workspaces* ***predominantly internal floorspace*** *as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. *Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.*" **[Our Emphasis]**
CU12	**Cultural Spaces and Facilities** "*To grow the range of cultural spaces and facilities in tandem with all new developments and across existing developments such as in basement or rooftop spaces where suitable to meet the needs of an increased population within the city.*"
CU14	**Cultural Uses in Developments on Former Industrial Lands** "*To ensure new developments on former industrial lands incorporate cultural uses (including night-time entertainment space designed to minimise impact on residential areas) as part of new mixed-use communities.*"

As the proposed development exceeds 10,000 sq m gross floor area, this policy applies.

We understand that the requirement for community/cultural space is 5% of the net floor area of the scheme (9,749 sq m), resulting in a need for 487.45 sq m of space. The proposed development seeks to provide 644 sq m of cultural/community space which will be located within the part-retained and refurbished Printing Hall at basement level (404 sq m) and ground floor level (240 sq m).

As detailed in the *Cultural Infrastructure (Impact) Assessment*, it is considered more appropriate to identify an end-use post-planning once construction is near commencement and an operational date is known as a potential user identified today may have found space elsewhere in the c. 3-4 years between now and completion, i.e. securing planning and constructing the development.

However, the *Cultural Infrastructure (Impact) Assessment* has narrowed down the uses of the space to two or possible three primary proposals:

- A theatre or dance rehearsal space, with associated storage and administrative offices, with the potential of the space to also function as a small performance venue.

- A dedicated cultural venue space, associated more directly with programmed gigs and performances, or a commercial or semi-commercial "club" or performance venue.

- A fully commercial cultural / natural heritage attraction, at present the details of which cannot be further divulged due to commercial sensitivities.

The feasibility of these options requires further consideration of the spaces' design, governance and operational model, including specialist consideration of lighting and sounding mitigation measures, whilst respecting the heritage characteristics of the space. However, the proposed space has been designed to adapt to potential sectors identified in the *Cultural Infrastructure (Impact) Assessment.*

8.2.7 Retail/Commercial Floorspace

The subject site is located within the City Centre Retail Core as per Figure 7.1 of the *Development Plan* and illustrated in Figure 8.7 below. Middle Abbey Street is a designated Category 2 Shopping Street as identified in Figure 7.2 of the *Development Plan* which is illustrated in Figure 8.8 below. Middle Abbey Street already hosts a mix of retail and non-retail uses which complement the primary retail function of the Category 1 Shopping Streets (Grafton Street & Henry Street).

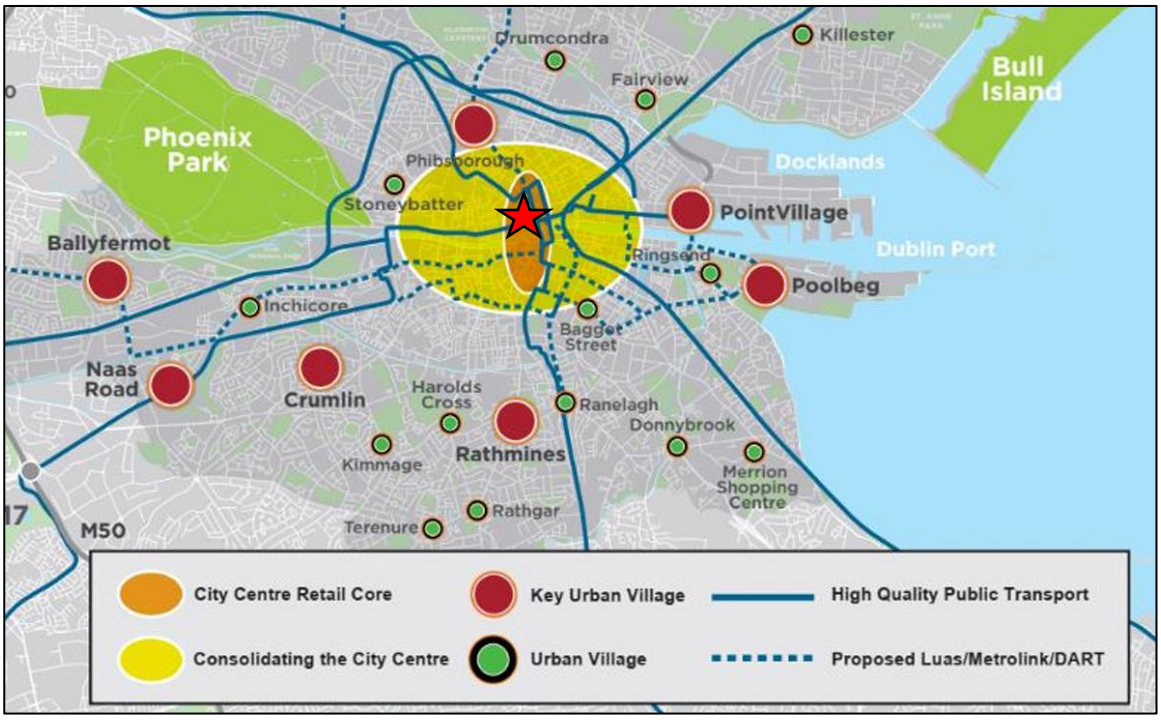


Figure 8.7: Location of the Subject Site (Indicatively Indicated by a Red Star) Within the City Centre Retail Core

(Source: Figure 7.1 of the *Dublin City Development Plan 2022-2028*, Annotated by Thornton O'Connor Town Planning, 2025)

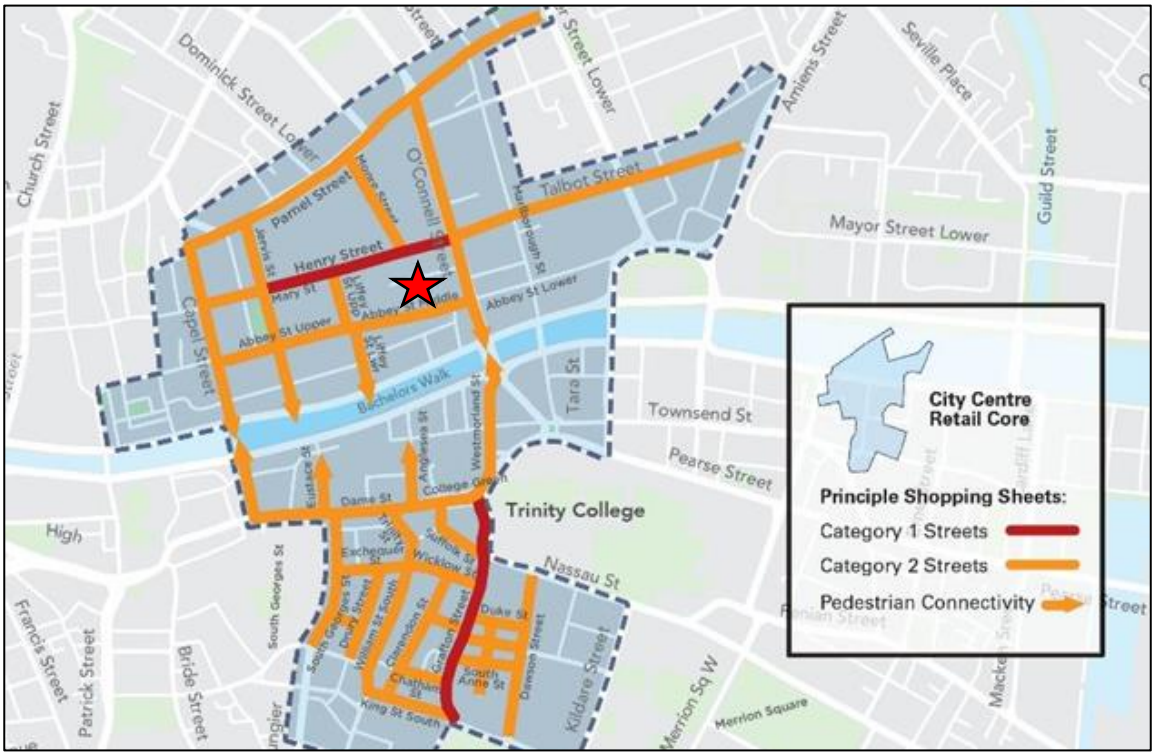


Figure 8.8: Dublin City Centre Retail Core Map Indicating the Principal Shopping Streets with the Indicative Location of the Subject Site Indicated by a Red Star

(Source: Figure 7.2 of the *Dublin City Development Plan 2022-2028*, Annotated by Thornton O'Connor Town Planning, 2025)

The Retail Strategy in Appendix 2 of the *Development Plan* sets out the overarching objective for development along Category 2 Shopping Streets:

> *"Further development of retail units will be encouraged along with complementary non retail uses such as cafés and restaurants, cultural, tourist and entertainment uses as well as retail services that add to the vibrancy of the street and create a mixed use environment to provide for a more integrated shopping and leisure experience. The overarching objective of the Category 2 Street designation is to create a rich and vibrant experience with a broad range of land uses and activities with active frontage, that contribute positively to the character and appearance of the Category 2 Streets."*

The following policies of the *Development Plan* are of most relevance to the proposed development:

Policy	It is the Policy of Dublin City Council:
CCUV4	**The Role of Retail** "*To promote and support the major contribution of retail and retail services to the vitality and success of the city, as a significant source of employment, a focus of tourism, as an important recreational activity and as a link with other cultural, recreational and community activities.*"

CCUV16	**Category 1 and Category 2 Streets** *"To protect the primary retail function of Category 1 Streets in the city and to provide for a mix of retail and other complementary uses on Category 2 streets. To promote active uses at street level on the principal shopping streets in the city centre retail core having regard to the criteria for Category 1 and Category 2 streets (see Appendix 2 and Figure 7.2)."*
CCUV17	**Diversifying the City Centre** *"To ensure the resilience of Dublin City Centre to changing trends in retail demand, appropriate opportunities to further diversify the city centre as a place to live, work and socialise will be encouraged."*
CCUV18	**Residential Development** *"To encourage, support and promote more residential apartments as part of mixed-use developments or through the reuse / retrofit of the upper floors of existing buildings. The use of upper floors for residential use is supported in principle on Category 1 and 2 Shopping Streets."*
CEE2	**Positive Approach to the Economic Impact of Applications** *"To take a positive and proactive approach when considering the economic impact of major planning applications in order to support economic development, enterprise and employment growth and also to deliver high-quality outcomes."*
CEE21	**Supply of Commercial Space and Redevelopment of Office Stock** *"(i) To promote and facilitate the supply of commercial space, where appropriate, including larger office floorplates suitable for indigenous and FDI HQ-type uses.* *(ii) To consolidate employment provision in the city by incentivising and facilitating the high-quality re-development of obsolete office stock in the city."*

The proposal seeks the redevelopment of the site of the former Independent Newspapers which ceased operations at the site in 2002 and 2004. The majority of the structures on site were used as offices, except for the warehouses and loading bay at the ground floor of the rear structures and the Printing Hall in the centre of the site. The retention of all structures on site was considered but due to the significant deterioration of the structure's fabric over the years, it was found that only certain structures and fabric could be retained and restored to allow the occupation of any future use of the building. The former offices in Independent House and Emerald Chambers will be repurposed to provide Student Accommodation bedspaces and amenity space as well as 2 No. retail units at the ground floor of Emerald Chambers. This is considered the epitome of how obsolete office stock in the city can be repurposed into long-standing uses.

As well as the 2 No. retail units proposed in Emerald Chambers, the proposed development also includes another retail unit at the corner of William's Lane and Prince's Street North and a café/restaurant in the north-east corner of the site along Prince's Street North, which promotes and facilitates the supply of commercial space in the City Centre.

The proposed 3 No. retail units and café/restaurant is appositive contribution to the City Centre Retail Core as they will create jobs and increase the level of activity and footfall in the area. Jobs will also be created for the managing and maintaining of the Student Accommodation and the cultural and community space. Importantly, the various retail/commercial/hospitality facilities in the area will be provided with a young workforce from the students of the accommodation.

8.2.8 Bicycle & Car Parking

Table 1 in Appendix 5 of the *Development Plan* sets out the minimum bicycle parking standards, with the following table providing the required standards for developments proposing Student Accommodation and cultural/community, café/restaurant and retail space:

Land Use	Long-Term (Residents & Staff)	Short-Term (Visitors)
Student Accommodation	1 No. space per bedroom	1 No. space per 5 No. bedrooms
Cultural/Community	1 No. space per 5 No. staff	1 No. space per 100 sq m
Café/Restaurant	1 No. space per 5 No. staff	1 No. space per 10 No. seats
Retail	1 No. space per 5 No. staff	1 No. space per 100 sq m

Based on the above *Development Plan* standards and the provision of 314 No. Student Accommodation bedrooms (316 No. bedspaces), 644 sq m of cultural/community space (20 No. staff), a café/restaurant with approximately 50 No. seats (11 No. staff), and retail space totalling 216 sq m (9 No. staff), the following bicycle parking spaces are required for the proposed development:

Land Use	Long-Term (Residents & Staff)	Short-Term (Visitors)
Student Accommodation	314 No. spaces	63 No. spaces
Cultural/Community	4 No. space	7 No. spaces
Café/Restaurant	2 No. spaces	5 No. spaces
Retail	2 No. spaces	2 No. spaces
Total	**322 No. spaces**	**77 No. spaces**
	399 No. spaces	

The proposed development seeks to provide 330 No. long-term spaces and 78 No. short-term spaces, totalling to 408 No. spaces which exceeds the minimum requirement set out in the *Development Plan.*

The standards for car parking in developments are set out in Table 2 in Appendix 5 of the *Development Plan,* with different standards provided for different areas based on the location of a site on the Parking Area Map (Map J) in the *Development Plan.* As the subject site is located in Parking Area 1, the following maximum car parking standards apply:

Land Use	Standard	Development Requirement
Student Accommodation	None	None
Cultural/Community	1 No. space per 350 sq m	2 No. spaces
Café/Restaurant	None	None
Retail	1 No. space per 350 sq m	0.6 No spaces
Total		**2.6 No. spaces**

The location of the subject site in the core of Dublin City Centre offers students, staff and visitors of the proposed development with numerous high-quality and high-frequency public transport options (Luas & bus stops and train stations) and active travel infrastructure. The central location of the site provides easy access to a multitude of locations and destinations frequently. Having regard to the highly accessible nature of the subject site, and the quantum of bicycle spaces proposed, the proposed development seeks to provide a zero-level car parking scheme.

8.3 Response to Other Relevant Policies, Objectives, Sections and Appendices of the *Development Plan*

Policy / Objective / Section / Appendix		Response
Chapter 3 – Climate Action		
CA2	*Mitigation and Adaptation* To prioritise and implement measures to address climate change by way of both effective mitigation and adaptation responses in accordance with available guidance and best practice.	Please refer to the *Climate Action, Energy & Sustainability Report* prepared by OCSC. This policy is met by utilising passive strategies such as energy efficient envelope where possible within the limitations of the Protected Structures and employing renewable energy systems such as high efficiency heat pumps and solar panels.
CA3	*Climate Resilient Settlement Patterns, Urban Forms and Mobility* To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019.	The subject scheme proposes the regeneration of an underutilised core urban brownfield site in proximity to high quality public transport in a high-density sustainable manner, in accordance with the *National Planning Framework 2018* and the *Regional Spatial and Economic Strategy 2019*, as discussed in detail in Section 6.2 & 7.0 of this Report.
CA4	*Improving Mobility Links in Existing Areas* To support retrofitting of existing built-up areas with measures which will contribute to their meeting the objective of a low-carbon city, such as reopening closed walking and cycling links or providing new links between existing areas.	William's Lane along the western boundary of the site currently provides a connection between Middle Abbey Street and Prince's Street North. The laneway is narrow and currently lacks any passive surveillance from the vacant buildings that enclose it, creating an unwelcoming presence and resulting in unwanted anti-social behaviour. Various public realm improvements are proposed to William's Lane as part of the subject development which will benefit members of the public, visitors of the City, and staff and residents of the local area through:

		1) The provision new seating areas for increased socialisation amongst members of the public as well as new planting for biodiversity and visual benefits; 2) The provision of active ground floor uses at the corner units of the laneway which will encourage footfall to the area and increased levels of passive surveillance; 3) The provision of a large student amenity space within the western portion of the ground floor which will be provided with large glazing along the façade for increased passive surveillance. Additionally, the proposed footpath upgrades, new active uses at ground floor, and the retained and enhanced facade along Prince's Street North will also increase the level of footfall to the area as this part of the street currently lacks any activation and animation. The proposed development will significantly improve the useability and enjoyability of an existing laneway and part of a street that is in desperate need of revitalisation.
CA5	*Climate Mitigation and Adaptation in Strategic Growth Areas* To ensure that all new development including in Strategic Development and Regeneration Areas integrate appropriate climate mitigation and adaptation measures. See also Section 15.4.3. Sustainability and Climate Action and Section 15.7.3 Climate Action and Energy Statement.	Please refer to the *Climate Action, Energy & Sustainability Report* prepared by OCSC. The proposed development has been designed in line with the energy hierarchy by utilising passive strategies such as an energy efficient envelope where possible within the limitations of the Protected Structures and employing renewable energy systems such as high efficiency heat pumps and solar panels.
CA6	*Retrofitting and Reuse of Existing Buildings*	The subject site contains multiple interconnecting structures that have been vacant for over 20 No. years, with little to no intervention

	To promote and support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction, where possible. See Section 15.7.1 Re-use of Existing Buildings in Chapter 15 Development Standards.	or protection of the internal and external fabric to prevent any damage. As discussed in the *Architectural Design Statement* and *Architectural Heritage Impact Assessment*, the retention of all structures on site was considered but due to the significant deterioration of the structure's fabric over the years, it was found that only certain structures and fabric could be retained and restored to allow the occupation of any future use of the building. As such, 3,650 sq m of existing floor space will be retained, restored, and incorporated into the new build elements to provide much needed Student Accommodation in Dublin City. The retention of Independent House, Emerald Chambers, the eastern part of the Printing Hall and part of the Prince's Street North façade is considered to be a positive representation of how the City's older building stock can be re-used to cater for more modern and long-standing uses.
CA7	*Energy Efficiency in Existing Buildings* To support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro-fitting of appropriate energy efficiency measures in the existing building stock, and to actively retrofit Dublin Council housing stock to a B2 Building Energy Rating (BER) in line with the government's Housing for All Plan retrofit targets for 2030.	Please refer to the *Climate Action, Energy & Sustainability Report* and the *Architectural Heritage Impact Assessment* for details on the proposed energy efficiency strategy for the proposed development and the potential impact to the Protected Structures. It is intended to achieve a target minimum A3 Building Energy Rating (BER) for the existing and proposed builds through, for example, an energy efficient façade and renewable energy systems such as high efficiency heat pumps and solar panels. There is a centralised district heating system proposed within the building via the communal heat pumps.
CA8	*Climate Mitigation Actions in the Built Environment* To require low carbon development in the city which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during	Please refer to the *Climate Action, Energy & Sustainability Report*, *Daylight and Sunlight Assessment Report*, *Resource Waste Management Plan* and the *Operational Waste Management Plan* which comprehensively considered the items listed in Policy CA8. In summary, the proposed development seeks to:

	construction and occupation, see Section 15.7.1 when dealing with development proposals. New development should generally demonstrate/ provide for: a. building layout and design which maximises daylight, natural ventilation, active transport and public transport use; b. sustainable building/services/site design to maximise energy efficiency; c. sensitive energy efficiency improvements to existing buildings; d. energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments; e. on-site renewable energy infrastructure and renewable energy; f. minimising the generation of site and construction waste and maximising reuse or recycling; g. the use of construction materials that have low to zero embodied energy and CO_2 emissions; and h. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.	1. Provide a building layout and design which maximises the level of daylight and natural ventilation received, whilst ensuring the least impact on the character and integrity of the Protected Structures. 2. Maximise the energy efficiency of the building through the building's thermally efficient envelope, a high-standard of air tightness, and the inclusion of passive design techniques. 3. Include renewable energy systems such as high efficiency heat pumps and solar panels. 4. Sensitively and carefully locate the proposed services required within the retained Protected Structures to ensure the impact to the historic and architectural fabric is minimal. 5. Source general construction materials from the Dublin area to minimise transportation distance and CO_2 emissions during the construction stage of the development. 6. Reuse and recycle any construction waste materials as far as is reasonably practicable. As detailed in Section 6 of the *Climate Action, Energy & Sustainability Report,* given the location of the subject site within the city centre, where there is limited potential for utility connections, and given its location outside the district heating zones, it is not currently deemed viable to connect to an external district heating system. The site will utilise high efficiency heat pumps to provide a communal hot water system within the development and if a district heating network became available within the area, a future connection could made

		with the provision of a hydraulic break and heat exchanger within the development.
CA9	*Climate Adaptation Actions in the Built Environment* Development proposals must demonstrate sustainable, climate adaptation, circular design principles for new buildings / services / site. The council will promote and support development which is resilient to climate change. This would include: a. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect; b. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings; c. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS); d. reducing flood risk, damage to property from extreme events– residential, public and commercial; e. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply; f. promoting, developing and protecting biodiversity, novel urban ecosystems and green infrastructure.	Sustainable Urban Drainage systems (SUDS) and reduction of surface water run-off have been incorporated into the design of the proposed development. The proposed development seeks to provide green and blue roofs on all available flat roof space. Blue roofs will provide attenuation of rainwater at roof level and will reduce the size of the underground storage tank. Green and blue roofs will reduce surface water runoff and encourage biodiversity. It is proposed that the roof water from the development draining to surface level via rainwater downpipes will be connected to a proposed rainwater harvesting tank which can be utilised for reuse within the development. Please refer to the *Engineering Assessment Report* and *Storm Water Management Plan* prepared by Waterman Moylan Consulting Engineers for further details. Please refer to the *Flood Risk Assessment* prepared by Waterman Moylan Consulting Engineers for details on the flood risk for the proposed development. The assessment concludes the following: *"Through careful design and appropriate mitigation measures the risks and consequences of flooding have been mitigated across the development. Surface water runoff from the site is limited to Greenfield runoff and does not impact on developments upstream or downstream of the subject site."* The subject site is currently hardstanding and lacks any biodiversity and landscaping on site. The proposed development seeks to promote biodiversity and increase natural habitat variety through the provision of numerous green roofs and the planting of native species and pollinator friendly species. The biodiverse roofs will incorporate wildflower and meadow-type vegetation which will

		create a rich environment that attracts pollinators, invertebrates, and the fauna that depend on them. Features such as pollinator-friendly plants and invertebrate habitats will be integrated to sustain this ecosystem, fostering biodiversity in an urban setting. Please refer to the *Landscape Design and Access Statement* for more details.
CA10	*Climate Action Energy Statements* All new developments involving 30 residential units and/or more than 1,000sq.m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.	A *Climate Action, Energy & Sustainability Report* has been prepared by OCSC and submitted herewith.
CA11	*Energy from Renewable Sources* To support, encourage and facilitate the production of energy from renewable sources, such as from solar energy, hydro energy, wave/tidal energy, geothermal, wind energy, combined heat and power (CHP), heat energy distribution such as district heating/cooling systems, and any other renewable energy sources, subject to normal planning and environmental considerations.	It was determined that high efficiency heat pumps and solar panels would be the most feasible and effective renewable energy sources for the proposed development given the constraints associated with the retention of the Protected Structures and the limited size of this infill, inner city site.
CA15	*Waste Heat, District Heating and Decentralised Energy* To actively encourage the development of low carbon and highly efficient district heating and decentralised energy systems across the city utilising low carbon heat sources such as renewable energy and waste heat recovery and to	The proposed development will utilise a central hot water system via the communal heat pumps. Rooms are provided with passive ventilation where possible and any mechanical systems have heat recovery to increase energy efficiency. Please refer to the *Climate Action, Energy & Sustainability Report* for further details.

	promote the connection of new developments to district heating networks where such systems exist/can be developed in a given area.	
CA17	*Supporting the Potential of District Heating in Dublin City* To support, encourage and facilitate the potential of district heating in Dublin City, all Climate Action Energy Statements submitted to the Council (see Policy CA10) shall include an assessment of the technical, environmental and economic feasibility of district or block heating or cooling, particularly where it is based entirely, or partially on energy from renewable and waste heat sources. In addition: • Climate Action Energy Statements for significant new residential and commercial developments in Strategic Development and Regeneration Areas (SDRAs), will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to an available or developing district heating network in the area. • Climate Action Energy Statements for significant new residential and commercial developments in the Docklands SDRA will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to the Dublin District Heating System.	Please refer to the *Climate Action, Energy & Sustainability Report*. In summary, given the location of the subject site within the city centre, where there is limited potential for utility connections, and given its location outside the district heating zones, it is not currently deemed viable to connect to an external district heating system. The site will utilise high efficiency heat pumps to provide a communal hot water system within the development and if a district heating network became available within the area, a future connection could made with the provision of a hydraulic break and heat exchanger within the development.
CA18	*Capture and Utilisation of Waste Heat* To encourage proposed and existing developments and facilities (such as data centres) to capture and utilise otherwise wasted heat, and use waste heat either on-site, or	As per the response to Policy CA17, there is no existing or currently proposed district heating network in the vicinity of the subject site. If a district heating network became available within the area, a future connection could made with the provision of a hydraulic break and heat exchanger within the development.

	in an adjoining, and nearby sites, in compliance with all relevant Energy Efficiency Regulations.	
CA23	*The Circular Economy* To support the shift towards the circular economy approach as set out in a Waste Action Plan for a Circular Economy 2020 to 2025, Ireland's National Waste Policy, as updated together with The Whole of Government Circular Economy Strategy 2022- 2023. https://www.gov.ie/en/publication/b542d-whole-of-government-circular-economy-strategy-2022-2023-living-more-using-less/	As part of this application, Waterman Moylan Consulting Engineers have prepared a *Resource Waste Management Plan* in line with the requirements of the Environmental Protection Agency (EPA) of Ireland's *Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects* and Enviroguide Consulting have prepared an *Operational Waste Management Plan* in line with best practice guidance and National, Regional and Local legislation and guidance which includes supporting the government circular economy strategy and the new *National Waste Management Plan for a Circular Economy* (NWMPCE) (2024-2030).
CA24	*Waste Management Plans for Construction and Demolition Projects* To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements.	Please refer to the *Construction Environmental Management Plan* and the *Resource Waste Management Plan* which cover the best practice guidance and waste management.
CA26	*Flood and Water Resource Resilience* To support, encourage and facilitate the delivery of soft, green and grey adaptation measures to enhance flood and water resource resilience in the city and support the delivery of grey adaptation measures to enhance flood and water resource resilience where necessary.	Please refer to the *Flood Risk Assessment* submitted herewith for the flood and water resource resilience. Existing flood and water resilience was considered, and measures were proposed where needed to enhance it.
CA27	*Flood Risk Assessment and Adaptation*	Please refer to the *Flood Risk Assessment* submitted herewith which confirm that the Strategic Flood Risk Assessment (undertaken as

	To address flood risk at strategic level through the process of Strategic Flood Risk Assessment, and through improvements to the city's flood defences.	part of the *Development Plan*) was consulted as well as the existing city's flood defences.
CA28	*Natural Flood Risk Mitigation* To encourage the use natural flood risk mitigation or nature based solutions including integrated wetlands, green infrastructure, and Sustainable Drainage Systems (SuDS) as part of wider adaptation and mitigation responses to achieve flood resilience.	Please refer to the *Flood Risk Assessment* and *Storm Water Management Plan* prepared by Waterman Moylan Consulting Engineers. Sustainable Drainage Systems such as green and blue roofs are proposed to encourage natural solution and achieve better flood resilience.
CA29	*Climate Action and Green Infrastructure* To protect, connect and expand the city's Green Infrastructure while optimising the climate change adaptation and mitigation services it provides.	The subject site is currently 100% hardstanding and offers no green infrastructure to the local area. The scheme will contribute to the green infrastructure of the city by providing green roofs and landscaping in the public realm and communal external amenity spaces. Please refer to the *Landscape Design and Access Statement* for more details.
Chapter 4 – Shape and Structure of the City		
SC1	*Consolidation of the Inner City* To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties, the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas.	The subject proposal seeks to redevelop a highly underutilised, brownfield, inner city site through the provision of a high density Student Accommodation development. The subject site benefits from its proximity to high-quality and frequent public transport options, as discussed in Section 2.0 of this Report, thus making the site suitable to provide a high density and compact development.
SC2	*City's Character* To develop the city's character by:	Please refer to the *Architectural Design Statement* prepared by Henry J Lyons.

	• cherishing and enhancing Dublin's renowned streets, civic spaces and squares; • developing a sustainable network of safe, clean, attractive streets, pedestrian routes and large pedestrian zones lanes and cycleways in order to make the city more coherent and navigable and creating further new streets as part of the public realm when the opportunities arise; • protecting the grain, scale and vitality of city streets and encouraging the development of appropriate and sustainable building heights to ensure efficient use of resources, services and public transport infrastructure and that protects the heritage and natural assets of the city; • revitalising the north and south Georgian squares and their environs and realising their residential potential; • upgrading Dame Street/College Green as part of the grand civic spine; • promoting the development of Moore Street and the Parnell Quarter as major new cultural and historical attractions for the city.	The proposed development carefully considers the requirements of Policy SC2 in its design and arrangement. In particular, the widening and public realm improvements proposed to William's Lane will provide a significantly upgraded pedestrian connection in the city centre. The addition of the active ground floor retail units, café/restaurant, cultural/community space and student amenity space will significantly enhance Prince's Street North, William's Lane and Middle Abbey Street and will increase footfall to the area. Furthermore, the restoration and refurbishment of the currently neglected façades of Independent House and Emerald Chambers will create a more attractive frontage along Middle Abbey Street and will enhance the architectural heritage of these Protected Structures.
SC3	*Mixed Use Development* To promote a mixed-use land use policy in the city centre, including the provision of high quality, sustainable residential development, and facilitating the conversion of both old office buildings and over shop spaces to residential.	The proposed development will provide a high-quality Student Accommodation and 3 No. retail units, a café/restaurant, and cultural/community space. Independent House, Emerald Chambers and part of the Printing Hall will be refurbished to cater for the mixed-use development, with Student Accommodation bedspaces located on all upper floors and a mix of student amenity space, retail, café/restaurant and cultural/community space located at ground floor and basement level.

SC4	*Recreational and Cultural Events* To promote and support a variety of recreational and cultural events in the city's civic spaces; as well as the development of new and the retention and enhancement of existing civic and cultural spaces.	The proposed development seeks to provide a total of 644 sq m of cultural/community space within the part retained Printing Hall. As detailed in the *Cultural Infrastructure (Impact) Assessment*, it is considered more appropriate to identify an end-use post-planning once construction is near commencement and an operational date is known as a potential user identified today many have found space elsewhere in the between now and completion, i.e. between securing planning and constructing the development. However, to give the Planning Authority a better understanding of some of the uses that may be facilitated within this space, please refer to the *Cultural Infrastructure (Impact) Assessment*.
SC5	*Urban Design and Architectural Principles* To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.	The development proposal meets the key design principals set out in Chapter 15. In particular, we respectfully point out the following development characteristics: • Design approach seamlessly knits existing heritage elements including Protected Structures with new purpose-built, high-quality accommodation adding to the overall vitality and uniqueness of this part of the city. • The improvements on Prince's Street North including provision of a new retail unit and café/restaurant and access to a significant cultural/community space will promote activity and make a positive contribution to Prince's Street North. • Significant improvements to William's Lane including widening, landscaping and passive surveillance of the Lane will facilitate a safe walking route between Prince's Street North and Middle Abbey Street contributing to the public realm for the benefit and / or enjoyment of the locality.

		• The overall scale, massing and material palette of the development is carefully considered such that it makes a positive contribution to the urban context. • The project reduces resource consumption by retaining and reusing substantial elements of the existing structures and employing best practice approach to material selection for new elements. Materials will be sustainably sourced, and the project includes renewable sources of electricity via solar panels at roof level and sustainable urban drainage initiatives (green & blue roofs) as set out in the accompanying documents. • Landscaped roof gardens support biodiversity. • The buildings are designed to meet the mobility needs and convenience of all user groups and complies in full with Part M of the building regulations.
SC8	*Development of the Inner Suburbs* To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport services and enhanced walking and cycling infrastructure.	The proposed development makes use of a highly underutilised, vacant, brownfield and infill site located along and in proximity to major public transport services as well as to facilities, amenities and services within Dublin City Centre.
SC10	*Urban Density* To ensure appropriate densities and the creation of sustainable communities in accordance with the principles	The proposed development represents an appropriate density and plot ratio given the location of the site in the centre of Dublin City where there is a multitude of public transport options and services, facilities and amenities.

	set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.	We note that the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)* supersede the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, *Urban Design Manual: A Best Practice Guide*. Please see Section 6.8 of this Report for further details.
SC11	*Compact Growth* In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will: • enhance the urban form and spatial structure of the city; • be appropriate to their context and respect the established character of the area; • include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents; • be supported by a full range of social and community infrastructure such as schools, shops and recreational areas; • and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.	The proposed development epitomises compact growth through the provision of a sustainable higher density development on an underutilised, brownfield, infill site adjacent to public transport links and within reasonable walking distance of a plethora of services, facilities and amenities, with the proposed development also providing services for the surrounding community.
SC12	*Housing Mix*	The proposed development introduces Student Accommodation in the heart of Dublin City Centre, providing a tenure diversity and mix,

	To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.	with the students bringing a different population cohort into the area, who can work in and utilise the plethora of commercial facilities provided in the local area as well as within the proposed retail units and café/restaurant.
SC13	*Green Infrastructure* To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.	Please refer to *Landscape Design and Access Statement*, particularly to the soft landscape design section showing proposed species, biodiverse roof and indicative ecological measures. Please also refer to the later part of the response to Policy CA9 above.
SC14	*Building Height Strategy* To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4.	Appendix 3 of the *Development Plan* identifies a series of areas within which additional height would generally be supported, with 'City Centre and within the Canal Ring (inner suburbs)' and 'Public Transport Corridors' considered to be applicable to the subject site. Accordingly, the *Development Plan* prescribes a series of 10 No. objectives and associated criteria in Table 3 of Appendix 3 which development of increased height exceeding the prevailing context must meet. Although the *Urban Development and Building Height Guidelines for Planning Authorities* specify a series of criteria which taller structures need to meet to allow the Council to Grant Planning Permission under SPPR3, these have not been directly responded to here (even though the proposed development complies with them) as they apply to developments proposed in instances where the height would be contrary to the specific objectives of a statutory plan (i.e. where blanket heights are applied). The Council is referred to Section 8.2.4.2 of this Report for the responses and compliance statements in relation to Table 3 of Appendix 3.

SC15	*Building Height Uses* To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.	There is a mix of uses within the proposed development including residential (Student Accommodation), commercial (3 No. retail units and a café/restaurant) and community/cultural uses proposed for the site.
SC16	*Building Height Locations* To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.	As the subject site is located in Dublin City Centre and along a high-frequency public transport corridor (Luas & buses), it is considered suitable to provide for additional height for the proposed development. Multiple planning applications have been granted permission in proximity to the subject site for developments reaching 9 No. and 11 No. storeys (refer to Section 4.0 above for details of these buildings). Therefore, it is considered that the proposed height of the development is respectful of, and in keeping with, the surrounding area.
SC17	*Building Height* To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height: • follow a design led approach; • include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3); • make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;	Please see Section 8.3.4.2 of this Report which demonstrates how the proposed development accords with Table 3 of Appendix 3 of the *Development Plan.* Please also refer to Table 7.1 of the *Architectural Heritage Impact Assessment* for a response to some of the criteria listed in this Policy.

	• deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; • Do not affect the safety of aircraft operations at Dublin Airport (including cranage); and • have regard to the performance-based criteria set out in Appendix 3. All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.	
SC19	*High Quality Architecture* To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods.	This application includes the restoration of important existing buildings that have been vacant for over 20 No. years. The design approach seamlessly knits existing heritage elements, including the Protected Structures, with new purpose-built high-quality accommodation adding to the overall vitality and uniqueness of this part of the city. The new retail units at Emerald Chambers and student amenity spaces and entrance to the managed Student Accommodation element of the development on Middle Abbey Street will significantly enhance this stretch of city streetscape. The improvements on Prince's Street North, including the provision of a new retail unit and a café/restaurant and access to a significant cultural/community space, will promote activity and make a positive contribution to the local streetscape.

		Significant improvements to William's Lane including widening, landscaping and passive surveillance of the Lane will facilitate a safe walking route between Prince's Street North and Middle Abbey Street contributing to the public realm for the benefit and enjoyment of the locality. The overall scale, massing, fenestration proportion and material palette of the development is carefully considered such that it makes a positive contribution to the urban context. Please refer to the *Architectural Design Statement* for further details.
SC20	*Urban Design* Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2019).	The proposed design of the development is in line with the Design Manual for Urban Roads and Streets. Please refer to the *DMURS Statement of Consistency* for details.
SC21	*Architectural Design* To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.	The proposed buildings are designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies. The design optimises heat recovery ventilation, and fenestration is carefully modulated to minimise glare and excessive solar gain. The accompanying *Daylight and Sunlight Assessment Report* demonstrates a high level of compliance with daylight standards. Notwithstanding the dense urban nature of the site, the proposed landscaping at ground and roof level will enhance the ecological value of the site through both extensive and intensive planted areas and green roofs on inaccessible terraces.

SC22	*Historical Architectural Character* To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures.	The existing structures on site was once occupied by the Independent Newspaper group, and despite its size and location, it is not widely recognised. The proposal aims to increase awareness of the site's historical connection to industrial printing by thoughtfully incorporating spaces and features that highlight its industrial character. Additionally, it seeks to invite the community to engage with and experience these historic areas. Please refer to the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for more details.
SC23	*Design Statements* That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15.	This application includes an *Architectural Design Statement* prepared by Henry J Lyons, which is enclosed separately.
Chapter 5 - Quality Housing and Sustainable Neighbourhoods		
QHSN3	*Housing Strategy and HNDA* (i) To secure the implementation of the Dublin City Council Housing Strategy (Appendix 1) in accordance with the provision of national legislation. (ii) To encourage the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the city in accordance with the provisions of the Housing Need Demand Assessment and any future Regional HNDA.	The subject supplication seeks to create a sustainable residential community by introducing a different housing typology to the area, one not currently provided in the area. Please refer to the response provided to Policy SC12 above.

QHSN6	*Urban Consolidation* To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.	Please see response provided to Policy SC3 above.
QHSN7	*Upper Floors* To resist and where the opportunity arises, to reverse the loss of residential use on upper floors and actively support proposals that retain or bring upper floors into residential use in order to revitalise the social and physical fabric of the city through measures such as the Living City Initiative. Dublin City Council will actively engage with property owners and other stakeholders at a national level to investigate other alternative measures in addition to the Living City Initiative to expedite bringing upper floors into residential use, and will be actioned by the City Recovery Task Force and its successor.	Please see response provided to Policy SC3 above.
QHSN8	*Reduction of Vacancy* To promote measures to reduce vacancy and underuse of existing building stock and to support the refurbishment and retrofitting of existing buildings, including Dublin City Council's Estate Renewal Programme.	The existing structures on site have been vacant since the closure of the printing press operations in 2002 and the offices & administration for Independent Newspapers in 2004. The vacant structures have been left to decay for over 20 No. years with little to no intervention to ensure the protection of the existing fabric. The proposed development seeks to retain 3,650 sq m of existing floor space with Independent House, Emerald Chambers, part of the Printing Hall and part of the Prince's Street North façade proposed to be retained, refurbished and incorporated into the Student Accommodation development.

QHSN11	*15-Minute City* To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.	The proposed development embraces the principles of the 15-minute city with a mix of uses, provision of 408 No. cycle spaces, healthy placemaking and density. Students, staff and visitors will be provided with efficient access to high capacity public transport as well as access to essential daily services within a 15-minute walk or cycle.
QHSN12	*Neighbourhood Development* To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which: • build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places; • integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city; • encourage sustainable and low carbon transport modes through the promotion of alternative modes and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance; • promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model.	This application includes the restoration of important buildings that have been vacant for over 20 No. years. The architectural language of the development has been designed to complement and enhance the immediate context. Generous student amenity, both internal and external has been included within this application including a workout gym and external rooftop terraces. A large quantum of bicycle storage is provided for all uses of the building, encouraging sustainable transport. The proposed improvements to William's Lane will create a permeable and legible public realm and will experience a significant increase in movement between Middle Abbey Street and Prince's Street and further onto O'Connell Street to the east and Henry Street via the GPO Arcade to the north of the site. The building, public realm improvements and amenity spaces have been designed to meet the applicable part M requirements.

	• promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance; • promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects; • cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion; • provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life; • have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the Regional Spatial and Economic Strategy and national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'; • are designed to promote safety and security and avoid anti-social behaviour.	The active frontage provided by the proposed ground floor uses will increase the level of passive surveillance at and around the site to create a safer and more enjoyable environment.
QHSN14	*High Quality Living Environment* To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs.	The proposed development provides a high-quality living environment by providing internal and external spaces that are designed to encourage socialisation either amongst members of the public or future students of the accommodation. The provision of much needed Student Accommodation bedspaces will also afford students the opportunity to find accommodation at a time of extreme shortages of all kinds of accommodation. Please refer to the responses to Policy SC19 & SC21 for further details.

QHSN16	*Accessible Built Environment* To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities.	All external areas have been designed in compliance with the *Technical Guidance Document Part M – Access and Use Building Regulations* (2022) and *Building for Everyone: A Universal Design Approach' by the National Disability Authority*. A variety of street furniture seating is chosen to allow accessibility for a range of users. Universal accessibility is provided for all external areas included within the development. All accessible rooms and studios are fully wheelchair accessible and are located near circulation cores for ease of access. There is sufficient space for disabled users in all circulation spaces and communal areas.
QHSN17	*Sustainable Neighbourhoods* To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.	The subject scheme will contribute to a sustainable neighbourhood that caters to a specific population cohort – students, a cohort not currently catered for. Thus, the subject scheme will contribute to a sustainable neighbourhood.
QHSN19	*Youth Friendly City* To promote and support a youth friendly city including the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure. To promote a built environment in the inner city, developing areas and Strategic Development Regeneration Areas which support the physical and emotional well-being of children and young people. To promote policies and objectives that have regard to the Children and Young People's Plans prepared by the Dublin City North and Dublin City South Children and Young People's Services Committees and any future DCC Youth	The proposed Student Accommodation is specifically proposed to cater for young people looking to live in Dublin City Centre whilst studying; a cohort not currently explicitly catered for in the area thus fully according with the policy. The provision of much needed Student Accommodation will support the physical and emotional wellbeing of the students. Students have clearly indicated the stresses and challenges of not being able to find suitable accommodation to live in whether that is a room in a house or PBSA. The scheme itself proposes a number of options for activities in the communal areas and students will have access to a range of other services, facilities and amenities nearby.

	Friendly City Strategy including any future youth homeless strategy.	
QHSN21	*Gated Residential Development* It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.	The only areas within the subject scheme that will be accessible by members of the public will be the enhanced public realm along William's Lane, the retail units and the café/restaurant. As with all Student Accommodation, their spaces will be private and not accessible to the public.
QHSN25	*Housing for People with Disabilities* To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which facilitates equality of outcome, individual choice and independent living. To support the provision of specific purpose-built accommodation, including assisted/supported living units, lifetime housing, and adaptation of existing properties.	The scheme incorporates accessible accommodation in compliance with the *Development Plan* requirements and Part M of the Building Regulations.
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.	There is no Student Accommodation in the immediate vicinity of the subject site and thus there will be no over proliferation. Please refer to Section 8.2.1 of this Report for more details.
QHSN45	*Third-Level Student Accommodation* To support the provision of high-quality, professionally managed and purpose-built third-level student	Whilst not directly adjacent to Third-Level Education Institutions, the subject site is within walking distance of Trinity College and TUD Grangegorman / Bolton Street campuses and as noted in the *Social Infrastructure Audit,* there are 23 No. 'third-level and adult education

	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.	institutions' within a 1-kilometre radius of the subject site. Policy QHSN45 specifically supports the provision of Student Accommodation in appropriate locations "*adjacent to high-quality public transport corridors and cycle routes*". The subject site is located at the epicentre of public transport for Dublin City and is provided with numerous options for future students to travel to and from 'third-level and adult education institutions'. The scheme complies with the 'Guidelines for Student Accommodation' section outlined in the *Development Plan*. Please refer to Section 8.2.1 of this Report for more details.
QHSN47	*High Quality Neighbourhood and Community Facilities* To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.	The proposal includes community/cultural space provision well in excess of the 5% requirements set out in the *Development Plan*. The proposal also includes retail units and a café/restaurant which will service the local community. The building has been designed to meet the relevant part M requirements throughout.
QHSN48	*Community and Social Audit* To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.	A *Social Infrastructure Audit* has been prepared by Turley which assesses the provision of community and social facilities in the vicinity of the subject site. The Audit concludes the following: "*The Social Infrastructure Audit has identified a broad range of services and facilities to support the proposed development commensurate to the site location within the Dublin City area.* *In light of the developer's proposed provision of community/cultural space and student amenity space, no*

		need has been identified to provide any additional social infrastructure facilities as part of the proposed development."
QHSN49	*Phasing* To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.	Given the nature of the development on a compact site in Dublin City Centre, it will be developed in a singular phase.
QHSN51	*Amenities and Retail* To ensure all areas of the city, including those that have Local Area Plans, deliver social infrastructure, sports and recreational facilities, retail outlets, schools and infrastructure in accordance to an agreed phasing programme to ensure large neighbourhoods are not left isolated without essential services.	Despite the central location of the subject site in proximity to Ireland's retail capital, the proposed development will still provide an additional 3 no. retail units, a café/restaurant and cultural/community space to the local area, ensuring future and existing residents and members of the public are catered for.
QHSNO15	*Community Safety Strategy* That all housing developments over 100 units shall include a community safety strategy for implementation.	The subject proposal comprises residential development in the form of Student Accommodation rather than apartments or houses. The Student Accommodation bedspace equivalent to apartment/housing units is calculated based on the *Compact Settlement Guidelines* which states that 4 No. student bedspaces equate to 1 No. residential unit. Based on the 316 No. student bedspaces proposed, the equivalent number of residential units is 79 No. units. As this is below the 100 No. unit requirement set out under Policy QHSNO15, a Community Safety Strategy has not been provided.

		Nevertheless, the proposed development will significantly improve the safety of the area through an increase in active street frontage/ passive surveillance along all sides of the building and the widening and activation of William's Lane will increase security through an increase in footfall and passive surveillance.
QHSN58	*Culture in Regeneration* To recognise culture as an important mechanism in regeneration, with the potential to act as a catalyst for integration, community development and civic engagement.	Cultural/community space is proposed as part of this development which will contribute to achieving this policy.
QHSN60	*Community Facilities* To support the development, improvement and provision of a wide range of socially inclusive, multi-functional and diverse community facilities throughout the city where required and to engage with community and corporate stakeholders in the provision of same.	Cultural/community space is proposed as part of this development which will contribute to achieving this policy.
Chapter 6 – City Economy and Enterprise		
CEE2	*Positive Approach to the Economic Impact of Applications* To take a positive and proactive approach when considering the economic impact of major planning applications in order to support economic development, enterprise and employment growth and also to deliver high-quality outcomes.	The proposed development will bring significant economic benefits to the local area; both in terms of the construction and operational phase. During the construction phase, a significant quantum of jobs will be created. In the operational phase, there will be jobs created in the retail units and café/restaurant as well as managing and maintaining the Student Accommodation and the cultural and community space. Importantly, the various retail/commercial/hospitality facilities in

		the area will be provided with a young workforce from the students of the accommodation.
CEE7	*Strategic and Targeted Employment Growth* To promote strategic and targeted growth of strategic development areas and corridors in accordance with the RSES and MASP with a focus on the city centre, the Docklands, the Outer City and Key Urban Villages and Neighbourhood Centres/Urban Villages.	The strategic redevelopment of this highly underutilised, brownfield, inner city centre site will provide much needed Student Accommodation bedspaces and together with the proposed retail units, café/restaurant and community/cultural space, will create jobs and increase the level of activity and footfall in the area.
CEE8	*The City Centre* To support the development a vibrant mix of office, retail, tourism related and cultural activities in the city centre and to facilitate the regeneration and development of key potential growth areas such as the Diageo lands, the St. James's Healthcare Campus and Environs and the TU Dublin campus at Grangegorman.	The proposed development will provide a mix of uses at this City Centre site, including Student Accommodation bedspaces, 3 No. retail units, a café/restaurant and cultural/community space.
CEE12	*Transition to a Low Carbon, Climate Resilient City Economy* To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.	Please refer to the *Climate Action, Energy and Sustainability Report* and *Transport Assessment* for details of how the proposed development will support the transition to a low carbon, climate resilient city. The development will play a role in supporting this transition due to: • Its proximity to public transport options; • Its proximity to the services, facilities and amenities; • The proposed mix of uses; • High efficient air source heat pump and mechanical vent and heat recovery technologies; and • The scheme's A3 BER rating; and • Provision of 408 No. cycle parking spaces.

CEE13	*Towards a Green and Circular Economy* To support the growth of the 'green economy' including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the transition towards a circular economy in line with national policy and legislation.	The proposed development will include PV panels, mechanical vent and heat recovery and highly efficient air source heat pumps which all accord with the renewable energy requirement. More details of these renewable energy technologies are provided in the *Climate Action, Energy and Sustainability Statement* submitted herewith. There is no parking proposed for the development due to the appropriate location of the subject site within the city centre, the proposed Student Accommodation use, the proximity to high-quality public transport, and the extensive cycle parking proposed. The *Resource Waste Management Plan* submitted herewith sets out that it is proposed to minimise waste and maximise reuse of materials during the demolition and construction stages.
CEE20	*Vacant Sites* (i) To engage in the 'active land management' of vacant sites and properties including those owned by Dublin City Council. (ii) To engage proactively with land-owners, potential developers and investors with the objective of encouraging the early and high quality re-development of such vacant sites. (iii) To encourage and facilitate the rehabilitation and use of vacant and under-utilised buildings, including their upper floors. (iv) To promote and facilitate the use, including the temporary use, of vacant commercial space and vacant sites, for a wide range of enterprise including cultural uses.	The subject site has been vacant for over 20 No. years when the printing press operations and distribution closed in 2002, and the office and administration sector further closed in 2004. Since then, the structures on site have experienced significant damage and deterioration from the lack of protection or intervention. The proposed development seeks to bring life back into this highly underutilised site by providing much needed Student Accommodation and other mix of uses in the heart of Dublin City Centre.
CEE21	*Supply of Commercial Space and Redevelopment of Office Stock*	The proposal seeks the redevelopment of the site of the former Independent Newspapers which ceased operations at the site in 2002 and 2004. Majority of the structures on site were used as

	(i) To promote and facilitate the supply of commercial space, where appropriate, including larger office floorplates suitable for indigenous and FDI HQ-type uses. (ii) To consolidate employment provision in the city by incentivising and facilitating the high-quality re-development of obsolete office stock in the city.	offices, except for the warehouses and loading bay at the ground floor of the rear structures and the Printing Hall in the centre of the site. The retention of all structures on site was considered but due to the significant deterioration of the structure's fabric over the years, it was found that only certain structures and fabric could be retained and restored to allow the occupation of any future use of the building. The former offices in Independent House and Emerald Chambers will be repurposed to provide Student Accommodation bedspaces and amenity space as well as 2 No. retail units at the ground floor of Emerald Chambers. This is considered the epitome of how obsolete office stock in the city can be repurposed into long-standing uses. As well as the 2 No. retail units proposed in Emerald Chambers, the proposed development also includes another retail unit at the corner of William's Lane and Prince's Street North and a café/restaurant in the north-east corner of the site along Prince's Street North, which promotes and facilitates the supply of commercial space in the City Centre.
CEE26	*Tourism in Dublin* (i) To promote and facilitate tourism as one of the key economic pillars of the city's economy and a major generator of employment and to support the appropriate, balanced provision of tourism facilities and visitor attractions. (ii) To promote and enhance Dublin as a world class tourist destination for leisure, culture, business and student visitors and to promote Dublin as a setting for conventions and cultural events. (iii) To improve the accessibility of tourism infrastructure to recognise the access needs of all visitors to our city.	As the academic year generally excludes the summer months, a lot of students will return home during this time which leaves the Student Accommodation uninhabited. By default, Student Accommodation development can provide tourist accommodation during the summer months principally. The use of the Student Accommodation as tourist accommodation during the summer months is appropriate given the location of the subject site in the heart of Dublin City Centre which experiences a high volume of tourists visiting every year. The area surrounding the subject site is a suitable location to provide tourist accommodation as demonstrated by the recently permitted hotels developments in the area, including the adjacent Arnott's hotel development (Reg. Ref. 4880/22).

CEE32	*Education and the City Economy* To promote Dublin as a national and international education centre/student city, as set out in national policy, and to facilitate and promote synergies between education, industry and entrepreneurship with an emphasis on retaining talent in the city, facilitating the expansion of existing economic clusters and the establishment of new clusters, and increasing participation in the city's labour force.	As detailed extensively in the press and via student protests, there is a significant unmet demand for Student Accommodation in the City. This makes it difficult to promote the City as a 'student city' as per this policy. The proposed development can only contribute positively to this policy.
Chapter 7 – The City Centre, Urban Villages and Retail		
CCUV1	*Retail Planning Guidelines* That future provision of retail development within the city will have regard to The Retail Planning Guidelines for Planning Authorities DECLG 2012. Dublin City Council will also have regard to these guidelines when preparing plans and in the assessment of retail-related planning applications.	The development adheres to the principals contained in the *Retail Planning Guidelines for Planning Authorities* DECLG 2012.
CCUV2	*Retail Hierarchy* To implement the retail hierarchy contained in the 'Retail Strategy' of this Development Plan and to support retail development at all settlement levels in the city. Retail development within the hierarchy of centres will be of a scale, type, and nature that reflects and enhances the role and function of the centre within which it is proposed as per the Retail Strategy, Appendix 2.	The subject site is located within the 'City Centre Retail Core' as per Figure 7.1 of the *Development Plan.* Middle Abbey Street is a designated Category 2 Shopping Street as identified in Figure 7.2 of the *Development Plan.* Middle Abbey Street already hosts a mix of retail and non-retail uses which complement the primary retail function of the Category 1 Shopping Streets (Grafton Street & Henry Street). Due to the vacancy of the existing buildings, a stretch of dead frontage along Middle Abbey Street, William's Lane and Prince's Street North is created which contributes to these streets and laneway not fulfilling its full potential as an attractive streetscape. The proposed development seeks to provide an additional 3 No. retail units within the City Centre Retail Core, as well as a

		café/restaurant which is also a positive addition to the area. The 2 No. retail units at the ground floor of Emerald Chambers and the retail unit at the corner of William's Lane and Prince's Street North will significantly enhance the streetscape and increase the level of footfall to the area.
CCUV4	*The Role of Retail* To promote and support the major contribution of retail and retail services to the vitality and success of the city, as a significant source of employment, a focus of tourism, as an important recreational activity and as a link with other cultural, recreational and community activities.	The proposed 3 No. retail units and café/restaurant is appositive contribution to the City Centre Retail Core as they will create jobs and increase the level of activity and footfall in the area, which it currently lacks due to dead frontage and the lack of passive surveillance for safety concerns. Jobs will also be created for the managing and maintaining of the Student Accommodation and the cultural and community space. Importantly, the various retail/commercial/hospitality facilities in the area will be provided with a young workforce from the students of the accommodation.
CCUV16	*Category 1 and Category 2 Streets* To protect the primary retail function of Category 1 Streets in the city and to provide for a mix of retail and other complementary uses on Category 2 streets. To promote active uses at street level on the principal shopping streets in the city centre retail core having regard to the criteria for Category 1 and Category 2 streets (see Appendix 2 and Figure 7.2).	Please refer to the response to Policy CCUV2.
CCUV17	*Diversifying the City Centre*	The proposed mix of uses on site will:

	To ensure the resilience of Dublin City Centre to changing trends in retail demand, appropriate opportunities to further diversify the city centre as a place to live, work and socialise will be encouraged.	• provide students with much needed accommodation in proximity to public transport options and Third-Level Education Institutions; • provide jobs to the local area through the provision of 3 No. retail units, a café/restaurant, cultural/community space and Student Accommodation; and • provide communal amenity space for students and an improved public realm along William's Lane for increased socialisation. Thus, the development accords with this policy to provide a place to live, work and socialise.
CCUVO5	*Underutilised and Inactive City Centre Streets* To reactivate the underutilised and inactive city centre streets and lanes in the city centre through the inclusion of art, landscaping, street furniture, outdoor dining, activity spaces and residential uses.	New retail units at Emerald Chambers and student amenity spaces and entrance to the managed Student Accommodation element of the development on Middle Abbey Street will significantly enhance this stretch of city street. The improvements on Prince's Street North including provision of 2 new retail units and access to a significant cultural/community space will promote activity and make a positive contribution to the local streetscape. Significant improvements to William's Lane including widening, landscaping and passive surveillance of the laneway will facilitate a safe walking route between Prince's Street North and Middle Abbey Street contributing to the public realm for the benefit and enjoyment of the locality. To support this increased activity along William's Lane, it is proposed to upgrade the existing paving to natural stone, provide street furniture by way of a variety of seating, and provide multiple planters for increased greenery. Soft landscaping suitable for deep shade are proposed to soften the lane and create a comfortable pedestrian environment.

CCUV27	*Provision of Convenience Retail* To promote convenience retail development in the city, particularly in new regeneration areas and where such development can provide an important anchor to secure the vitality and viability of Key Urban Villages, urban villages and neighbourhood centres.	The specific retail use of the 3 No. retail units is not yet known at this juncture and will be clarified post-planning at detailed design stage as potential tenants identified today many have found space elsewhere in the years between now and completion, i.e. between securing planning and constructing the development.
CCUV28	*Provision of Retail Services* To support and promote the development of retail service development at all levels of the retail hierarchy in the city.	The proposed development seeks to provide 3 No. retail units in Dublin City Centre which accords with this policy.
CCUV30	*Cafés / Restaurants* To promote and facilitate the provision of cafés / restaurants in the city and support their role in making the city more attractive for residents, workers, and visitors and in creating employment.	The proposed development seeks to provide a café/restaurant at the north-east corner of the site along Prince's Street North. The café/restaurant is a positive addition to the local area and will serve members of the public who wish to visit and use the retail units or community/cultural spaces, as well as students and visitors of the Student Accommodation. The café/restaurant will generate a number of employment opportunities by providing local residents or people living nearby with part-time or full-time work and students of the accommodation with part-time work.
CCUV37	*Plan Active and Healthy Streets* To promote the development of a network of active, healthy, attractive, high quality, green, and safe streets and public spaces which are inviting, pedestrian friendly and easily navigable. The aspiration is to encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement	William's Lane is proposed to be provided with active frontage and designed with high-quality materials and soft landscaping to improve pedestrian comfort and safety through passive surveillance. While a small section of William's Lane is enclosed, the development widens the lane with a building offset. Street furniture by way of short-term cycle parking encouraging active transport to the area and a variety of seating create a place to stop and rest creating streets more accessible to walking.

	within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.	Please refer to the response to Policy CA4 for full details on how the proposed public realm improvements to William's Lane will significantly improve its attractiveness, useability and safeness for members of the public. Currently there is dead frontage along Middle Abbey Street and Prince's Street North which discourages people from traveling through the highly underutilised William's Lane. The refurbishment works to the retained structures and facades and the proposed new build elements, along with the proposed uses at ground floor, will improve the streetscape and attract people towards the site and the newly animated William's Lane.
CCUV38	*High Quality Streets and Spaces* To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender.	The proposed public realm improvements to William's Lane will include seating to encourage socialisation between members of the public as well as students and will be provided with numerous planters for biodiversity and visual benefits. The widened and improved William's Lane will contribute towards providing a vibrant, attractive, accessible, and safe development for people of all ages, ability, disability and gender. The proposed retention and incorporation of the Prince's Street North façade into the proposed development and the enhancement works proposed to the footpath along this street will also create an improved and attractive environment.
CCUV39	*Permeable, Legible and Connected Public Realm* To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.	The proposed improvements to William's Lane will create a permeable and legible public realm and will experience a significant increase in movement between Middle Abbey Street and Prince's Street and further onto O'Connell Street to the east and Henry Street via the GPO Arcade to the north of the site.

CCUV40	*Public Safety* To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012.	Due to the narrowness of William's Lane and the dead frontage provided on all sides of the site as a result of the structures long-standing vacancy, there is currently a lack of passive surveillance onto the streets which creates an unwelcoming presence and results in unwanted anti-social behaviour. The proposed development creates a safe public realm with high levels of passive surveillance provided from the ground floor student amenity space within the building and the active frontage provided by the 3 No. retails units and café/restaurant. The proposal to bring the vacant site back into use and the proposed mix of uses will also increase the number of people at, visiting, or passing by the site which will inevitably result in more 'eyes on the street' and a safer environment.
CCUV42	*Public Realm – City Centre* To move to a low traffic environment generally and to increase the amount of traffic free spaces provided in the city centre over the lifetime of the Plan as well as create new high quality public realm areas where possible taking into account the objective to enhance access to and within the city centre by public transport, walking and cycling.	As stated in the *Social Infrastructure Audit*, there are 23 No. 'third-level and adult education institutions' located within a 1-kilometre radius of the subject site and thus students will be able to easily reach these campuses either by walking, cycling or using public transport. Students will also be able to cycle or use public transport to get to the other 'third-level and adult education institutions' located outside this 1-kilometre radius. There are 408 No. cycle parking spaces proposed in total for the subject scheme. Out of this total, 320 No. spaces will be for students of the accommodation. Having regard to the city centre location of the subject site, the proposed development will be a car free scheme to encourage people to walk, cycle or use public transport to travel to destinations. Additionally, given the restricted nature of the site as an infill, inner city site, it is also not feasible to provide any space for car parking.

CCUV44	*New Development* That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility.	Please refer to the *Landscape Design and Access Statement* for details of the proposed hard and soft landscaping and to the responses provided to Policies CA4 and CCUV37 – CCUV40.
Chapter 8 – Sustainable Movement and Transport		
SMT1	*Modal Shift and Compact Growth* To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.	The predicted travel patterns for the residents and staff of the proposed development are discussed in Section 3 of the *Travel Plan* prepared by Waterman Moylan Consulting Engineers. The development was designed with zero car parking spaces and focuses on walking, cycling or the use of public transport for its residents and commercial area staff. The analysis within the report indicates that there will be the following modal split targets for journeys to and from education facilities (students) or work (at the subject site): • 45% public transport (Luas, bus & train); • 30% cycle; • 20% walk; • 5% car (passenger); and • 0% car (driver).
SMTO1	*Transition to More Sustainable Travel Modes* To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle).	As demonstrated in the *Travel Plan* and summarised in the response to Policy SMT1 above, there will be a 45: 50: 5 split between public transport, walking/cycling and private car. Although the public transport split is marginally below the target specified in Objective SMTO1, the walking/cycling split is nearly double the target. This is due to the proximity of the site to Third-Level Education Insitutions (23 No. within a 1-kilometre radius) whereby students will be more likely to walk or cycle a few hundred metres rather than use public transport.

		The development is to continuously monitor the modal shift and promote the use of sustainable travel modes.
SMT4	*Integration of Public Transport Services and Development* To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.	The proposed development embodies this policy by providing a more intensive mixed-use development along the Red Line Luas and in proximity to the Green Line Luas and a multitude of bus route options.
SMT6	*Mobility Management and Travel Planning* To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.	A *Travel Plan* has been prepared by Waterman Moylan Consulting Engineers and is submitted herewith.
SMT7	*Travel Plans for New and Existing Developments* To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.	A *Travel Plan* has been prepared by Waterman Moylan Consulting Engineers and is submitted herewith.
SMT9	*Public Realm in New Developments* To encourage and facilitate the co-ordinated delivery of high-quality public realm in tandem with new developments throughout the city in collaboration with private developers	The proposed development will significantly improve and enhance the public realm along William's Lane. Please refer to the responses provided to Policies CA4 and CCUV37 – CCUV40.

	and all service/utility providers, through the Development Management process.	
SMT11	*Pedestrian Network* To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.	In order to protect and enhance the pedestrian network a Quality Audit, which includes a pedestrian audit, was carried out to make sure all key point for the network were considered in the design. A new crossing is proposed along Prince's Street North to allow pedestrians to cross safely considering that the road is frequently being used by delivery vehicles for the nearby commercial business. Please refer to proposed Site Layout for more details. The proposed improvements to William's Lane will create a permeable and legible public realm and will experience a significant increase in movement between Middle Abbey Street and Prince's Street and further onto O'Connell Street to the east and Henry Street via the GPO Arcade to the north of the site.
SMT12	*Pedestrians and Public Realm* To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.	The re-imagined public realm along William's Lane will be provided with active frontage to increase levels of passive surveillance and will be designed with high-quality materials and soft landscaping to improve pedestrian comfort.
SMTO2	*Improving the Pedestrian Network* To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.	Please refer to the response provided to Policy SMT11.

SMT13	*Urban Villages and the 15-Minute City* To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.	This policy is not directly applicable to the proposed development however the scheme includes upgrades to William's Lane to improve the permeable connection along the site, which will benefit active travel.
SMT16	*Walking, Cycling and Active Travel* To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.	Please refer to the response provided to Policies SMT1, SMTO1 & SMT11.
SMT18	*The Pedestrian Environment* To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.	Please refer to the response provided to Policies CA4 and CCUV37 – CCUV40.
SMTO10	*Walking and Cycling Audits* Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken.	A Quality Audit including a pedestrian and cycling audit was carried out and is submitted herewith.

SMT33	*Design Manual for Urban Roads and Streets* To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.	Design was made in line with DMURS. Please refer to the *DMURS Statement of Consistency* and site layout for details.
Chapter 9 - Sustainable Environmental Infrastructure and Flood Risk		
SI2	*Integrating Water Services with Development* To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.	Uisce Eireann was consulted under Reference No. CDS24004395 and a Confirmation of Feasibility was received which stated that the development is feasible without infrastructure upgrades. Furthermore, with the controlled surface water discharge to the network, the development will help minimise flows at the existing combined network.
SI3	*Separation of Foul and Surface Water Drainage Systems* To require all new development to provide separate foul and surface water drainage systems.	As set out in the drawings and reports prepared by Waterman Moylan Consulting Engineers, it is be confirmed that the foul and surface water within the development will drain separately.
SI4	*Drainage Infrastructure Design Standards* To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).	The proposed development's drainage infrastructure has been designed to comply with the Greater Dublin Regional Code of Practice for Drainage Works as well as the Uisce Eireann Code of Practice for Wastewater and Wastewater Infrastructure Standard Details. Please refer to the *Engineering Assessment Report*, the *Storm Water Management Plan* and drawings prepared by Waterman Moylan Consulting Engineers for details.

SI6	*Water Conservation* To require all developments to incorporate best practice water conservation and demand management measures in order to promote water conservation by all water users, and minimise the pressure for water drawdown, wastage of water supply and reduced availability of water resources.	Water conservation measures will be used, to further reduce overall water demand, including: • Low volume flush / dual flush WC's; • Aerated shower heads; • Spray taps; • Draw off tap controls; and • Leak detection measures – through the metering of supply.
SI9	*Groundwater Pollution* To promote the progressive reduction of pollution of groundwater.	To prevent any resulting groundwater quality impacts during the construction stage of the development, various mitigation measures have been identified in the *Construction Environmental Management Plan.*
SI13	*Minimising Flood Risk* To minimise the flood risk in Dublin City from all other sources of flooding as far as is practicable, including fluvial, coastal, reservoirs and dams, the piped water system, and potential climate change impacts.	Waterman Moylan Consulting Engineers have prepared a *Flood Risk Assessment* which concludes that: "*Through careful design and appropriate mitigation measures the risks and consequences of flooding have been mitigated across the development.*" Climate change impacts have been taken into account in the *Flood Risk Assessment*, as well as in the drainage infrastructure design for the proposed development.
SI14	*Strategic Flood Risk Assessment* To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028, including all measures to mitigate identified climate change and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Justification Tests, and to have	Please refer to the *Flood Risk Assessment* prepared by Waterman Moylan Consulting Engineers which takes the Strategic Flood Risk Assessment (prepared as part of the *Development Plan*) into account.

	regard to the Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans.	
SI15	*Site-Specific Flood Risk Assessment* All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with: • The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 and any future amendments, and the Strategic Flood Risk Assessment (SFRA) as prepared by this development plan. • The application of the sequential approach, with avoidance of highly and less vulnerable development in areas at risk of flooding as a priority and/ or the provision of water compatible development only. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change and those associated with existing flood defences. The SSFRA will include site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface	Please refer to the *Flood Risk Assessment* prepared by Waterman Moylan Consulting Engineers which takes the Strategic Flood Risk Assessment (prepared as part of the *Development Plan*) into account. The sequential approach to determining whether a particular development is appropriate for a specified location in terms of flood risk is detailed within the report and concludes that the development is deemed 'Appropriate' at this location and a Justification Test is not required.

	with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. Allowances for climate change shall be included in the SSFRA. • On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at significant risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management Guidelines 2009) on the portion at significant risk of flooding. There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding which do not have existing development on them.	
SI20	*Basement Flood Risk Management* That there is a general presumption against the development of basements for residential use below the estimated flood levels for Flood Zones A or B (see Section 15.18.4 and Appendix 9 for further guidance).	The existing site includes a basement in which the proposed development will utilise; however, the lowest Student Accommodation bedspaces within the development are at first floor level. The basement and ground floor spaces will be used for student amenity, community/cultural space, retail units, a café/restaurant and ancillary space such as plant and bin storage. In addition, we note that the site is located in Flood Zone C, so the risk of flooding within the development is low.
SI21	*Managing Surface Water Flood Risk* To minimise flood risk arising from pluvial (surface water) flooding in the City by promoting the use of natural or nature-based flood risk management measures as a priority,	Please refer to the response provided to Policy CA9 for details of the proposed SuDS on site. The *Flood Risk Assessment* prepared by Waterman Moylan Consulting Engineers assesses the risk of pluvial flooding which concludes that the risk of flooding is minimised with adequate sizing of the on-site combined sewer network and SUDS

	by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits, and climate adaption.	devices such as green and blue roofs, flow restrictions, storage tanks etc. As a result of the proposed SuDS and other design measures, there is a low residual risk of flooding from each of the surface water risks. Please refer to the *Flood Risk Assessment* for full details.
SI22	*Sustainable Drainage Systems* To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design & Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.	Please refer to the response provided to Policy CA9 and the *Storm Water Management Plan* and *Engineering Assessment Report* for details of the proposed SuDS on site. SuDS elements were used as much as possible given the City Centre location and the existing 100% hardstanding area of the site. Green and blue roofs are proposed in line with guidelines mentioned in Policy SI22.
SI23	*Green Blue Roofs* To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's	Green and blue roofs are proposed for the development and are in line with the DCC's *Green & Blue Roof Guide (2021)*. Please refer to the *Engineering Assessment Report* for details.

	Green & Blue Roof Guide (2021) which is summarised in Appendix 11.	
SI25	*Surface Water Management* To require the preparation of a Surface Water Management Plan as part of all new developments in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance.	Please refer to the *Storm Water Management Plan* prepared by Waterman Moylan Consulting Engineers.
SI26	*Taking in Charge of Private Drainage Infrastructure* To require that all new surface water infrastructure within public or private developments be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works, irrespective of the management and maintenance regime proposed for the development or whether or not the development is intended to be taken in charge, in full or in part (i.e. infrastructure shall be to designed to taking in charge standards).	All surface water infrastructure will be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works.
SI27	*Sustainable Waste Management* To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective. To support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).	A *Resource Waste Management Plan* and a *Construction Environmental Management Plan* have been prepared to effectively manage construction & demolition waste in line with current Irish legislation and guidance. An *Operational Waste Management Plan* has also been prepared to manage waste that is produced during the operational phase of this development.

SI28	*Sustainable Waste Management* To prevent and minimise waste generation and disposal, and to prioritise prevention, recycling, preparation for reuse and recovery in order to develop Dublin as a circular city and safeguard against environmental pollution.	Please see the response provided to Policy SI27.
SI29	*Segregated Storage and Collection of Waste Streams* To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance, see Appendix 7).	An *Operational Waste Management Plan* has been prepared by Enviroguide Consulting to ensure that the management of waste during the operational phase of the proposed development is undertaken in accordance with the current legal and industry standards including: the Waste Management Act 1996 as amended, the Protection of the Environment Act 2003, as amended, A Waste Action Plan for a Circular Economy: Ireland's National Waste Policy 2020-2025, the National Waste Management Plan for a Circular Economy 2024-2030, the Dublin City Council (Segregation, Storage and Presentation of Household and Commercial Waste) By-laws, 2018, as amended. In particular, this OWMP aims to provide a robust strategy for the storage, handling, collection and transport of the wastes generated at site.
SI35	*Ambient Noise Quality* To seek to preserve and maintain noise quality in the City in accordance with good practice and relevant legislation.	Wave Dynamics have assessed the noise impact of the proposed development on nearby noise sensitive locations which is detailed in the *Acoustic Design Statement* submitted herewith.
SI37	*Noise Sensitive Development* To give careful consideration to the location, design and construction of noise-sensitive developments, including the horizontal and vertical layout of apartment schemes, so as to ensure they are protected from major noise sources, where	An assessment of the potential noise impact to the development was carried out by Wave Dynamics and the results are provided in the *Acoustic Design Statement* submitted herewith. The assessment identified the site to be categorised as medium to high risk; however, with the proposed mitigation measures outlined in Section 5 of the Report, including appropriate facade sound insulation specification, it was concluded that:

	practical, and to minimise the potential for noise disturbance.	"*This report demonstrates that all dwellings (student accommodation bedrooms, communal living/kitchen area and studios) will meet the specified internal noise level requirements provided the guidance in this report is followed. External amenity spaces have been provided in line with the guidance set out in ProPG. Based on this the development is in general compliance with the ProPG requirements.*" Please refer to the response provided to Section 15.18.9 for the conclusion of the *Acoustic Design Statement* regarding the proposed development's vibration impact and operational and construction noise impact.
SI38	*Noise Sensitive Development* To ensure that new residential development close to approved commercial uses is suitably sound insulated (for further guidance, see Sections 15.14 and 15.18.9).	Please see the response provided to Policy SI37 and also please refer to the *Acoustic Design Statement*.
SI41	*Lighting Standards* To provide and maintain high quality and appropriate street/ outdoor lighting on public roads, footways, cycleways, public realm throughout the City in accordance with the Council's Vision Statement for Public Lighting in Dublin City and related public lighting projects. In general, the lighting of roads and public amenity areas shall be provided in accordance with the requirements of the latest Public Lighting Standards IS EN13201 and further updates.	The scheme has been designed in accordance with the following relevant standards and guidelines: • BS 5489-1-2013 Code of Practice for the Design of road lighting. (Published on: 31st May 2020 by BSI Standards Limited 2020) • I.S. EN 13201-2-2015 Road lighting - Performance Requirements (Published on: 31st Jan 2016 by BSI Standards Limited 2016) • Dublin City Council document on General Specification for Public Lighting Design and Installation in the Dublin City Council Area (Published on: January 2020).

		• Electrical work shall also comply with the requirements of ESB Networks' National Code of Practice for Customer Interface and ESB Networks' Code of Practice for avoiding Danger from Overhead Electricity Lines.
SI42	*Light Pollution* To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.	The lighting regime has been designed with consideration of the impact to local residents and any wildlife near or on the site. Lighting has been designed and selected to ensure light spillage has been minimised. As detailed in the *Site Lighting Report*, the lighting calculations were conducted to examine if the light spills from the fittings and it was concluded that the levels were appropriately low. Construction lighting will be designed so as to be sensitive to the potential presence of bats and will adhere to the relevant guidelines.
SI43	*Energy Efficient Lighting* To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.	All public areas around the building will be appropriately and safely lit and the lighting specification has been selected for an energy efficient development. All luminaires shall be able to dim up or down to achieve the desired lighting class and controlled with timers and photocell sensors. The design of the developments facades also allows high levels of natural daylight to enter into occupied zones.
Chapter 10 - Green Infrastructure and Recreation		
GI1	*Green Infrastructure Assets* To identify and protect the integrity of the city's GI assets, as appropriate, and to enhance and expand the connectivity, multi-functionality, and accessibility of the city's green infrastructure network, while addressing gaps in the network.	Please refer to the *Landscape Design and Access Statement*, particularly the soft landscape design section showing proposed species, biodiverse roof and indicative ecological measures.

GI3	*Multi-functionality (GI)* To ensure delivery of multifunctional green and civic spaces that meet community needs, support biodiversity, promote active and passive recreation, flood and surface water management and local habitat improvements. The multi-functionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.	Functional communal amenity space with high quality furniture and a variety of uses have been proposed alongside hitting policy requirements for green/blue roof and providing soft landscaping for amenity and biodiversity value. The green roof area and associated ecological enhancement will improve the current area and provide a 'net gain' of biodiversity throughout the lifetime of the development.
GI4	*Accessibility* To ensure universal design for access for all to the green infrastructure network. Priority of access is to be given to pedestrians over all other users. In line with the Parks Strategy, access to facilities and to public parks and open spaces will be provided equally to all citizens and inequalities of access shall be identified and addressed.	All external areas have been designed to Part M, including the public realm improvements along William's Lane and Prince's Street North and the communal amenity terraces at rooftop level.
GI5	*Greening of Public Realm / Streets* To integrate urban greening features including nature based solutions into the existing public realm where feasible and into the design of public realm projects for civic spaces and streets. The installation of living green walls will be encouraged to the fullest possible extent throughout the city of Dublin and tree pits with mixed planting will be preferred for the greening of streets in recognition of the co-benefits they offer for SuDs, biodiversity, amenity value and traffic calming.	Greening at ground floor is very restricted given the hardstanding nature and building footprint of the site, however, the widening of William's Lane will provide a reimagined public realm that will include container grown plants suitable for high shade. Green walls are not proposed due to fire risk and as retention of existing structure was prioritised.

GI7	*Connecting Greening Elements in Site Design* To avoid the fragmentation of green spaces in site design and to link green spaces /greening elements to existing adjacent green infrastructure / the public realm where feasible and to provide for ecological functions.	Please refer to the *Landscape Design and Access Statement*, particularly the soft landscape design section showing proposed species, biodiverse roof and indicative ecological measures.
GIO1	*Green Roof Guidance Document (2021)* The use of green / blue roofs in developments will be in accordance with the requirements of the Dublin City Council Green and Blue Roof Guide Document (2021), see Appendix 11.	Green and blue roofs are proposed in line with the Dublin City Council's *Green & Blue Roof Guide* (2021). Please refer to the *Storm Water Management Plan* and *Engineering Assessment Report* for details.
GI9	*European Union Natura 2000 Sites* To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites).	Please refer to the *Appropriate Assessment Screening Report* (*AA Screening Report*) prepared by Enviroguide Consulting. This report has assessed and screened out any potential sources of significant adverse effects to EU sites as a result of the proposed development.
GI10	*Flora and Fauna Protected under National and European Legislation Located Outside Designated Areas* To adequately protect flora and fauna (under the EU Habitats and Birds Directives), the Wildlife Acts 1976 (as amended), the Fisheries Acts 1959 (as amended) and the Flora (Protection) Order 2022 S.I No. 235 of 2022, wherever they occur within Dublin City, or have been identified as	An *Ecological Impact Assessment Report* (*EcIA*) has been prepared by Enviroguide Consulting which addresses the protection of flora and fauna under EU and National legislation.

	supporting the favourable conservation condition of any European sites.	
GI11	*Proposed Natural Heritage Areas* To protect and enhance the ecological functions and connectivity of habitats and species of proposed Natural Heritage Areas (pNHAs) to be designated by the National Parks and Wildlife Service (NPWS).	The *EcIA* outlines the measure proposed to enhance connectivity of habitats and to enhance the site for species occurring in the wider environs. Any Proposed Natural Heritage Areas (pNHA) have been identified in relation to the subject site.
GI12	*National and International Sites for Nature Conservation* To protect sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.	Enviroguide has considered all relevant protected Sites in the *EcIA*, including sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.
GI13	*Areas of Ecological Importance for Protected Species* To ensure the protection, conservation and enhancement of all areas of ecological importance for protected species, and especially those listed in the EU Birds and Habitats Directives, including those identified as supporting the favourable conservation condition of any European sites, in accordance with development standards set out in this plan.	An *AA Screening Report* and *EcIA* have been prepared for the proposed development which address the protection and conservation of areas of ecological importance for protected species.
GI14	*Ecological / Wildlife Corridors* To maintain and strengthen the integrity of the city's ecological corridors and stepping stones which enable species to move through the city, by increasing their connectivity [to be shown in the proposed Green Infrastructure Strategy] under Article 10 of the EU Habitats	Future habitats within the site will strengthen considerably when compared with baseline conditions. Examples include the provision of Swift nesting habitat (which were found to be historically present within 2km of the Site), native planting as part of the landscape strategy, and the provision of additional invertebrate habitat.

	Directive. Development proposals should not compromise their ecological functions and should realise opportunities to contribute to enhancing the nature conservation value of them by landscaping that provides complementary habitats. An Ecological Impact Assessment will be required for any proposed development likely to have a significant impact on habitats and species of interest on or adjacent an ecological corridor.	
GI15	*Inland and Sea Fisheries* To protect inland and sea fisheries and take full account of Inland Fisheries Ireland Guidelines 'Planning for Watercourses in the Urban Environment' 2020, when undertaking, approving or authorising development or works which may impact on rivers, streams, watercourses, estuaries, shorelines and their associated habitats. To protect sea angling sites designated by Inland Fisheries Ireland at the North and South Bull Walls and at Dollymount and Sandymount Strands.	Standard best practice during the construction phase have been outlined in the *AA Screening Report*. Operational phase design has considered fully the change in hydrological conditions resulting from the proposed development. No impacts are anticipated which could affect watercourses, as outlined in the *AA Screening Report*.
GI16	*Habitat Creation and New Development* That new developments (as appropriate) will be required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.	Swift nesting boxes have been proposed as an enhancement measure as part of the Proposed Development and are detailed in the *EcIA*. The green roof area and associated ecological enhancement will improve the current area and provide a 'net gain' of biodiversity throughout the lifetime of the development.

GI17	*Habitat Restoration* To increase the percentage of restored and naturalised areas on public land in the city. That new development on private and public lands should provide opportunities for restoration of degraded habitats and soils where feasible and provide for their long-term maintenance to limit degradation.	Please refer to the response provided to Policy GI16 above.
GI18	*Minimise Impact – Light and Noise* To minimise the environmental impact of external lighting and noise at sensitive locations to achieve a sustainable balance between the needs of an area, the safety of walking and cycling routes and the protection of sensitive species such as bats (see also Section 9.5.9 Public & External Lighting).	Construction lighting will be designed to be sensitive to the potential presence of bats and will adhere to relevant guidance. Construction noise and vibration will comply with the requirements of BS 5228-1:2009+A1:2014 and BS 5228-2:2009+A1:2014 (Code of Practice for Noise and Vibration Control on Construction and Open Sites) as well as Safety, Health and Welfare at Work (General Application) Regulations 2007, Part 5 Noise and Vibration.
GIO7	*National Biodiversity Action Plan 2017-2021* To support the management targets for nature conservation sites set out in the National Biodiversity Action Plan 2017 (and as updated) and the objectives for local authorities to address threats to biodiversity.	Please refer to the response provided to Policy GI16 above.
GIO8	*Dublin City Biodiversity Action Plan 2021 - 2025* To support the implementation of the 'Dublin City Biodiversity Action Plan 2021–2025' (or as updated), which sets out key themes and objectives for biodiversity conservation and restoration and measurable targets and actions, in partnership with all relevant stakeholders.	Please refer to the response provided to Policy GI16 above.

GIO9	*Invasive Alien Species* To support measures to prevent the introduction of and to control the spread of invasive alien species in Dublin City in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 and EU Regulations 1143/2014 and to implement the targets and actions set out in the Dublin City Invasive Alien Species Action Plan 2016 – 2020 (or as updated).	One medium-impact invasive species was identified at the subject site. Measures to deal with invasive species are detailed in the *EcIA*.
GIO10	*All Ireland Pollinator Plan 2021 - 2025* To have regard to the all-Ireland Pollinator Plan 2021 – 2025 in the management of the Council's open spaces, parks and roadside verges and to encourage the pollination of vacant, derelict and temporary sites through measures to protect and increase the populations of native wild bees and other pollinators.	The All-Ireland Pollinator Plan 2021 – 2025 has been considered in the landscaping proposed for the site. The proposed development seeks to promote biodiversity and increase natural habitat variety through the provision of numerous green roofs and the planting of native species and pollinator friendly species. The biodiverse roofs will incorporate wildflower and meadow-type vegetation which will create a rich environment that attracts pollinators, invertebrates, and the fauna that depend on them. Features such as pollinator-friendly plants and invertebrate habitats will be integrated to sustain this ecosystem, fostering biodiversity in an urban setting.
GI20	*Views and Prospects* To protect and enhance views and prospects which contribute to the appreciation of landscape and natural heritage.	Figure 4.1 of the *Development Plan* identifies the 'Key Views and Prospects' within the City. There are three identified views in the vicinity of the subject site - see Figure 11 in the *Townscape and Visual Impact Assessment* (*TVIA*). Two of these are views north and south along O'Connell Street, to the east of the site. The proposed development would not be visible in these views. The third is the view east along Prince's Street North, from a position beside the subject site, with the GPO to the left, towards O'Connell Street and the Clery's building on the far side of O'Connell Street.

		The impact on this view is assessed by Viewpoint 13 in the *TVIA*. The assessment found that the effect on the view would be 'very significant positive'. An unsightly warehouse/ office building in the foreground of the view would be replaced by a building of high quality design and materials, incorporating the retained and enhanced warehouse facade. In addition to the improvement in the built environment, the new student community and the active uses at ground floor would activate the streetscape of Prince's Street North. The GPO, O'Connell Street ACA and the Clery's building would all benefit from the improvement in their townscape context. The key/protected view would be significantly enhanced.
GI24	*Multi-Functionality (GI)* To incorporate new open space into the green infrastructure network for the city, and providing a multi-functional role including: outdoor recreation, biodiversity, urban drainage, flood management, connection and carbon absorption without compromising public access to and the amenity function of open space (see Section 15.6: Green Infrastructure and Landscaping).	The subject site currently lacks any green infrastructure. As such, the proposed development will provide both hard and soft landscaping, with a focus on increasing the green and blue infrastructure on site. As detailed in the *Landscape Design and Access Statement*, the aim of the soft landscaping proposed is to "*add a strong, well-vegetated character to the site*". To help create this experience and enhance biodiversity on site, the use of native species of various heights and colours are maximized.
GI28	*New Residential Development* To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.	Due to the restricted nature of this inner city site, it is not feasible to provide public open space. However, we note that public realm improvements are proposed as part of the development, including the widening of William's Lane and the provision of seating and planting along the laneway. As detailed in the *Social Infrastructure Audit*, the subject site is located in proximity to public parks such as the following: • Diamon Park • Liberty Park

		• the Garden of Remembrance • Wolfe Tone Square • St Stephen's Green • Mountjoy Square • Merrion Square • Fitzwilliam Square • Iveagh Gardens. The *Social Infrastructure Audit* concludes the following regarding the level of sports, recreation and parks facilities: "*On the basis of our review, it is considered that the study area provides a good level of sports, recreation and parks facilities commensurate to its city centre location to support the student development proposed. It is concluded that on-site sports and recreational facilities are not required to support the development*."
GI40	*Tree Planting - General* To require appropriate and long-term tree and native hedgerow planting in the planning of new development, urban spaces, streets, roads and infrastructure projects. New development should seek to provide for additional tree planting using a diversity of species including native species as appropriate to the location of the development in the interests of natural heritage, amenity, environmental quality and climate resilience.	There are no trees existing at the subject site. The proposed development seeks to provide tree planting in the form of container planters.
GI41	*Protect Existing Trees as Part of New Development* To protect existing trees as part of new development, particularly those that are of visual, biodiversity or amenity	There are no trees existing at the subject site.

	quality and significance. There will be a presumption in favour of retaining and safeguarding trees that make a valuable contribution to the environment.	
Chapter 11 – Built Heritage and Archaeology		
BHA2	*Development of Protected Structures* That development will conserve and enhance protected structures and their curtilage and will: (a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht. (b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance. (c) Ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation. (d) Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials. (c) Ensure that the form and structural integrity of the protected structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the protected structure. (d) Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA2.

	(e) Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the protected structure. (f) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features. (g) Ensure historic landscapes, gardens and trees (in good condition) associated with protected structures are protected from inappropriate development. (h) Have regard to ecological considerations for example, protection of species such as bats.	
BHA3	*Loss of Protected Structures* That the City Council will resist the total or substantial loss of protected structures in all but exceptional circumstances.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA3.
BHA4	*Ministerial Recommendations* To have regard to the National Inventory of Architectural Heritage (NIAH) rating of a structure and any associated Ministerial Recommendation in the assessment of planning applications.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA4.
BHA5	*Demolition of Regional Rated Building on NIAH* That there is a presumption against the demolition or substantial loss of any building or other structure assigned a 'Regional' rating or higher by the National Inventory of Architectural Heritage (NIAH), unless it is clearly justified in a written conservation assessment that the building has no special interest and is not suitable for addition to the City Council's Record of Protected Structures (RPS); having	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA5.

	regard to the provisions of Section 51, Part IV of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).	
BHA6	*Buildings on Historic Maps* That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report this it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA6.
BHA7	*Architectural Conservation Areas* (a) To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area, and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA7.

	(b) Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA. (c) Ensure that any new development or alteration of a building within an ACA, or immediately adjoining an ACA, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged. (d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture. (e) Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA. (f) Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within ACAs. All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access, or requires removal to protect other specimens from disease.	
BHA8	*Demolition in an ACA* There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA8.

	of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.	
BHA9	*Conservation Areas* To protect the special interest and character of all Dublin's Conservation Areas – identified under Z8 and Z2 zoning objectives and denoted by red line conservation hatching on the zoning maps. Development within or affecting a Conservation Area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible. Enhancement opportunities may include: 1. Replacement or improvement of any building, feature or element which detracts from the character of the area or its setting. 2. Re-instatement of missing architectural detail or important features. 3. Improvement of open spaces and the wider public realm and reinstatement of historic routes and characteristic plot patterns. 4. Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area. 5. The repair and retention of shop and pub fronts of architectural interest. 6. Retention of buildings and features that contribute to the overall character and integrity of the Conservation Area. 7. The return of buildings to residential use. Changes of use will be acceptable where in compliance with the zoning objectives and where they make a positive contribution to the character, function and appearance of the	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA9.

	Conservation Area and its setting. The Council will consider the contribution of existing uses to the special interest of an area when assessing change of use applications, and will promote compatible uses which ensure future long-term viability.	
BHA10	*Demolition in a Conservation Area* There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of a Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA10.
BHA11	*Rehabilitation and Reuse of Existing Older Buildings* (a) To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment. (b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features. (c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA11.

BHA12	*Industrial, Military and Maritime, Canal-side and Rural Heritage* To promote an awareness of Dublin's industrial, military and maritime, canal-side (including lock-keepers' dwellings, locks and graving docks), rail, and rural (vernacular) heritage.	Independent House is identified on the Dublin City Industrial Heritage Record (DCIHR). Please refer to the *Industrial Heritage Survey* prepared by Fred Hamond for details on the subject site's industrial heritage.
BHA15	*Twentieth Century Buildings and Structures* (a) To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised. (b) To encourage the retention and reinstatement of internal and external features, that contribute to the character of exemplar twentieth century buildings, such as roofscapes, boundary treatments, fenestration pattern, materials, and other features, fixtures and fittings (including furniture and art work), considered worthy of retention.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA15.
BHA16	*Industrial Heritage* To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans and the assessment of planning applications. To review the DCHIR in accordance with Ministerial Recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City.	Independent House is identified on the Dublin City Industrial Heritage Record (DCIHR). Please refer to the *Industrial Heritage Survey* prepared by Fred Hamond for details on the subject site's industrial heritage.
BHA18	*Historic Ground Surfaces, Street Furniture and Public Realm* (a) To protect, conserve and retain in situ historic elements of significance in the public realm including milestones, jostle	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA18.

	stones, city ward stones, bollards, coal hole covers, gratings, boot scrapers, cast iron basement lights, street skylights and prisms, water troughs, street furniture, post boxes, lampposts, railings and historic ground surfaces including stone kerbs, pavement flags and setts, and to promote conservation best practice and high standards for design, materials and workmanship in public realm improvements within areas of historic character, having regard to the national Advice Series on Paving: The Conservation of Historic Ground Surfaces (2015). (b) To maintain schedules of stone setts, historic kerbing and historic pavers/flags, and associated features in the public realm, to be protected, conserved or reintroduced (Appendix 6), and to update and review these schedules during the period of this development plan.	
BHA20	*Ghost Heritage Signs* To seek the retention and maintenance of heritage signs and advertising through the city, where appropriate.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA20.
BHA21	*Retrofitting Sustainability Measures* To have regard to the Department of Environment, Heritage and Local Government's publication on Energy Efficiency in Traditional Buildings (2010) and the Irish Standard IS EN 16883:2017 Conservation of Cultural Heritage- Guidelines for Improving the Energy Performance of Historic Buildings (2017) and any future updates or advisory documents in assessing proposed works on heritage buildings.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA21.

BHA22	*Upgrading Environmental Performance* To ensure a sustainable future for historic and other buildings subject to heritage protection, the City Council will encourage and support works to upgrade the environmental performance of the existing building stock that incorporates good standards of design and appearance. Where these works involve historic buildings subject to protection (this includes buildings referenced on the Record of Protected Structures and non-protected structures in an Architectural Conservation Area), the works shall not adversely affect the special interest of the structure and thus a sensitive approach will be required, taking into account: • The significance of the structure, and • The extent of intervention, including impact on historic fabric, the technical requirements of a traditionally constructed building, visibility, siting and design. The installation of renewable energy measures and equipment will be acceptable where sited and designed to minimise the visual impact and does not result in any significant loss of historic fabric or otherwise affect the significance of the structure.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA22. Please refer to the *Climate Action, Energy & Sustainability Report*. The communal heat pumps and solar PV installed on the new build elements of the building will also serve the areas within the protected structure.
BHA24	*Reuse and Refurbishment of Historic Buildings* Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA24.

	quality place-making, and by demonstrating best practice in the care and maintenance of historic properties in public ownership.	
BHA26	*Archaeological Heritage* 1. To protect and preserve Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994 which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland. 2. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994. 3. To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places; all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.	Please refer to the *Archaeological Assessment* prepared by IAC Archaeology.

	4. Development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged. 5. To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated. 6. Preserve the character, setting, and amenity of upstanding and below ground town wall defences. 7. Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land, shall have regard to the Shipwreck Inventory maintained by the Department of Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment. 8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.	
BHAO16	*City Wall and City Defences* To continue to preserve, and enhance the surviving section of the City Wall and City Defences - a National Monument, according to the recommendations of the City Walls Conservation Plan (2005) - with reference to the National Policy on Town Defences (2008).	Please refer to the *Archaeological Assessment* prepared by IAC Archaeology which assesses the impact of the development on any archaeological remains and recommends appropriate mitigation measures where necessary.

BHAO19	*Built Heritage and Archaeology* To provide for the protection, preservation and promotion of built heritage, including architectural heritage, archaeological heritage and underwater heritage, and support the in situ presentation and interpretation of archaeological finds within new developments.	Please refer to the *Archaeological Assessment* prepared by IAC Archaeology which assesses the impact of the development on any archaeological remains and recommends appropriate mitigation measures where necessary. Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHAO19. Section 8 of the Report identifies items proposed for salvage and retention within the proposed scheme.
BHA28	*Historic Place and Street Names* To preserve historic place and street and development names and ensure that new street and development names reflect appropriate local archaeological, historical or cultural associations.	Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for the response to Policy BHA28.
Chapter 12 – Culture		
CU1	*Shared Vision for Culture* To lead and support the development of a shared vision for culture in the city in collaboration with cultural institutions and other cultural bodies in recognition of their key role and contribution to the cultural life of the city.	The provision of culture/community space in the scheme will contribute towards achieving this policy.
CU2	*Cultural Infrastructure* To ensure the continued development of Dublin as a culturally vibrant, creative and diverse city with a broad range of cultural activities provided throughout the city, underpinned by quality cultural infrastructure.	The provision of culture/community space in the scheme will contribute towards achieving this policy.

CU4	*Cultural Resources* To support the development of new and expanded cultural resources and facilities within the city that enrich the lives of citizens and visitors, provide new opportunities for engagement and celebrate aspects of our history and culture.	The provision of culture/community space in the scheme will contribute towards achieving this policy.
CU7	*Cultural Clusters and Hubs* To support existing, and encourage the growth of, emerging cultural clusters and hubs within the city, which bring together cultural activities interlinked with supporting uses (such as restaurants, retail, galleries and venues) to create vibrant, defined cultural quarters and communities within the city that give a variety of cultural experiences to all.	The provision of culture/community space in the scheme will contribute towards achieving this policy.
CU9	*Parnell Square and North Inner City Cultural Cluster* To promote and support the growth of the Parnell Square and North Inner City cultural cluster to facilitate opportunities that provide benefits both to the wider City and to the economic growth and regeneration for the NEIC that supports artists, mitigates social exclusion and increases opportunities for expression and artistic engagement for the diverse local community and in particular, young people.	The provision of culture/community space in the scheme will contribute towards achieving this policy.
CU14	*Cultural Uses in Developments on Former Industrial Lands* To ensure new developments on former industrial lands incorporate cultural uses (including night-time entertainment space designed to minimise impact on residential areas) as part of new mixed use communities.	The eastern part of the former Printing Hall will be reused and refurbished to provide cultural/community space which contribute towards achieving this policy.

CU17	*Design of Cultural and Arts Facilities* To promote a co-design approach to cultural and arts facilities and that applicants and developers consider the Toolkit guide for artform specific workplace to inform the design of such spaces.	Turley have utilised the DCC Guidance Note 1 & 2 and Toolkit Resources 1, 2 and 3 in the preparation of the *Cultural Infrastructure (Impact) Assessment.* Please refer to the Report for further details.
CUO25	*SDRAs and large Scale Developments* All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area* must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. *Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.	As the gross floor area of the development is over 10,000 sq m, the requirement to provide a minimum of 5% community, arts and cultural space applies. We understand that the requirement for community/cultural space is 5% of the net floor area of the scheme (9,749 sq m), resulting in a need for 487.45 sq m of space. The proposed development seeks to provide 644 sq m of cultural/community space which will be located within the part-retained and refurbished Printing Hall at basement level (404 sq m) and ground floor level (240 sq m). As detailed in the *Cultural Infrastructure (Impact) Assessment*, it is considered more appropriate to identify an end-use post-planning once construction is near commencement and an operational date is known as a potential user identified today may have found space elsewhere in the c. 3-4 years between now and completion, i.e. securing planning and constructing the development. However, the *Cultural Infrastructure (Impact) Assessment* has narrowed down the uses of the space to two or possible three primary proposals: • A theatre or dance rehearsal space, with associated storage and administrative offices, with the potential of the space to also function as a small performance venue.

		• A dedicated cultural venue space, associated more directly with programmed gigs and performances, or a commercial or semi-commercial "club" or performance venue. • A fully commercial cultural / natural heritage attraction, at present the details of which cannot be further divulged due to commercial sensitivities. The feasibility of these options requires further consideration of the spaces' design, governance and operational model, including specialist consideration of lighting and sounding mitigation measures, whilst respecting the heritage characteristics of the space.
CUO30	*Co-Design and Audits* Large development applications (over 10,000 sq. m., either in phases or as one application) will, in the absence of a DCC local area culture audit (CUO44 refers), be required to undertake a cultural audit for the local area to identify shortcomings within the area; and to work with DCC Arts Office to identify and agree appropriate arts or cultural uses, preferably as part of a co-design process in advance of lodging an application, for inclusion in the development. Such audits shall be informed by the existing cultural mapping resources in the Dublin City Cultural Infrastructure Study and by Culture Near You maps.	Please refer to the response provided to Policy CUO25 above and the *Cultural Infrastructure (Impact) Assessment* for details. As detailed in the Report, discussions with the DCC Arts Office is ongoing.
CU22	*Range of Cultural and Amenity Options* To seek and encourage a range of cultural and amenity options for residents and visitors within the city that are	As stated in the response to Policy CUO25 above, and in the *Cultural Infrastructure (Impact) Assessment,* there is no exact end-use identified for the proposed cultural/community space. However, the

	independent of licenced premises to allow options for younger people, families, elders and others to engage and enjoy a range of activities in the city during evening hours.	Assessment has narrowed down the potential uses of the space to two or possible three primary proposals.
CUO47	*Accessibility* To encourage people of all abilities and ages including wheelchair users to take part fully in the city's culture as consumers, creators, artists and workers by supporting a high standard of accessibility in new and existing cultural assets.	The proposed cultural/community space has been designed to be accessible for people of all abilities and ages.
CUO54	*Naming of New developments* To ensure that all new developments are named in the Irish language only, to redress the historic under-representation of Irish language names in the City; whilst also reflecting the rich diversity of history and origins of place names and townland names within Dublin and also names that are reflective the social history of each place. All place names installed for new streets or estates must be bi-lingual.	This will be agreed at compliance stage with Dublin City Council.
CUO58	*Public Art* All large scale regeneration schemes, whether lodged for planning as a single or multiple applications; where the total scale of regeneration exceeds 25,000 sq. m. shall be required to include an element of public art.	As the proposed development does not exceed 25,000 sq m, there is no requirement to provide public art as part of the subject proposal.
Chapter 15 – Development Standards		
15.3.1	To facilitate the proper assessment of a development proposal in circumstances where it is considered that a proposed development would be likely to have a significant	A suite of Environmental Reports has been prepared and are submitted with this planning application.

	effect on the environment, due to the nature, scale or location of the proposal, Dublin City Council will require the submission of an Environmental Impact Statement in accordance with the provisions of the Planning and Development Regulations 2001, as amended.	
15.3.2	All applications will be screened for AA by the competent authority (Dublin City Council) as part of the planning process. Applicants are however, required to carry out a screening statement and subsequent Stage 2 assessment (if necessary) for inclusion with the planning application.	Enviroguide Consulting have prepared an *Appropriate Assessment Screening Report* to accompany this planning application. A Stage 2 assessment was not deemed necessary.
15.3.3	An Ecological Impact Assessment should be carried out for all developments within or adjacent to any sensitive habitat, ecological corridor, specific landscape character area or which has the potential to contain protected habitats or species.	An *EcIA* has been prepared and outlines all ecological features, mitigation measures and enhancements.
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 Development Standards | Chapter 15 559 the principles of the 15 minute city as set out in Chapters 4 and 5. The provision of active recreation and sports facilities in new neighbourhoods and public spaces will be supported as well as greening measures including the use of nature based water retention infrastructure in the public realm (see policy GI27, objective GIO5).	Healthy placemaking principles have been embedded into the design of the proposed development. The proposed development will result in the redevelopment and regeneration of a highly underutilised site, thereby enhancing the public realm and healthy placemaking through the creation of a more attractive and desirable environment. The concept of the 15-minute city is highly relevant to the proposed development as the scheme has been designed to a high standard, incorporating a sense of healthy placemaking through the provision of accessible, safe and inclusive spaces within the proposed building and along the re-imagined William's Lane. The below provides a response to each of the key principles to consider:

	Key principles to consider are: • The contribution to the public realm for the benefit and / or enjoyment of the locality. • The ability to create a sense of place and community using existing site features, tree coverage and landscaping to support green infrastructure and healthy streets. • The use of high quality materials and finishes including hard and soft landscaping. • The orientation of open space and the accessibility to daylight and sunlight. • Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets. • The accessibility of the development and the traffic calming measures in place in accordance with DMURS. • The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc. • Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.	• Significant improvements to William's Lane including widening, landscaping and passive surveillance of the Lane will facilitate a safe walking route between Prince's Street North and Middle Abbey Street contributing to the public realm for the benefit and / or enjoyment of the locality. • Due to the vacancy of the existing buildings, a stretch of dead frontage along Middle Abbey Street, William's Lane and Prince's Street North is created. The proposed public realm improvements (including new planting), the restoration and refurbishment of the existing structures and facades proposed to be retained, and the provision of active ground floor uses will create a new sense of place. • A buff/yellow brick with black brick along the ground floor are proposed for the new building to ensure the long-term maintenance of the building, whilst drawing inspiration from the surrounding historic context. In addition to the proposed building materials, both hard and soft landscaping is proposed, with a focus on increasing the green infrastructure on site. • The orientation of the student amenity space is so that they receive high levels of daylight and sunlight. We note the conclusion of the *Daylight and Sunlight Assessment Report* regarding the external amenity spaces: "*the development offers strong sunlight access in its exterior amenity areas, including multiple roof terraces with excellent sunlight potential*". • The proposed development will deliver the highest quality and well-designed public realm and student amenity space. The proposed public realm improvements to William's Lane

		will improve linkages and connections and will enhance accessibility. The large quantum of internal communal amenity space will provide a cinema and various lounges for students to hangout and socialise with one another, while the study room, workspace room, meeting room and breakout space will provide a quiet space for students to study outside of their bedroom and somewhere suitable for any groupwork. A gym, including a yoga studio, is also provided to promote a healthy lifestyle amongst students. The external communal amenity space at fifth, sixth and eighth floor level will provide residents with a place to relax and socialise through multiple seating areas, a BBQ/cooking area, an outdoor cinema, and games areas. These spaces will be filled with an abundance of planting and shrubs to create an enclosure of areas, enhance the local biodiversity, and create visually pleasant spaces. • A *DMURS Statement of Consistency* prepared by Waterman Moylan Consulting Engineers provides details of how the proposed development complies with DMURS. • The proposed development will include a total of 320 No. cycle parking spaces for students of the accommodation which will be located in a dedicated cycle store at basement level. There are 64 No. visitor bicycle parking spaces proposed for visitors of the Student Accommodation which will also be located in a dedicated cycle store at basement level. The staff of the retail units, Student Accommodation and café/restaurant will be provided with 10 No. spaces. Visitors of the retail units, café/restaurant and community/cultural space will be provided with 14 No. cycle parking spaces. The proposed level of cycle parking for the development will encourage people to cycle to and from the

		site. There will be seating proposed along William's Lane for members of the public to socialise or relax as well as various seating options provided for students in the amenity roof terraces.
15.4.2	*Architectural Design Quality* Imaginative, innovative and contemporary architecture is encouraged in all development proposals, provided that it respects Dublin's heritage and local distinctiveness and enriches the city environment. Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance. Through the use of high quality materials and finishes and the appropriate building form, the architectural quality of development should positively contribute to the urban design and streetscape, enhancing the overall quality of the urban environment. In particular, development should respond creatively to and respect and enhance its context. The urban form and layout of a development can influence a range of factors including microclimatic impacts and visual impacts. In this regard, the layout, position and composition of buildings on a site should be considered. The layout of a development should be designed to be attractive to all users, particularly pedestrians, cyclists, people with disabilities and the elderly. Key principles to consider are:	Careful consideration and analysis have been undertaken for the overall massing and architectural design of the proposal to ensure the architectural and historic character of the Protected Structures on site are retained. The composition is designed to be sympathetic in material choice (buff brick) and has carefully curated setbacks with feature bat window arrangements. With regard to microclimate and wind in particular, please see enclosed a *Wind and Microclimate Study* prepared by OCSC which demonstrates that the current design creates no adverse wind effects at the subject site and that "*the proposed development may be classified as a high-quality, comfortable environment for occupants throughout the year*". As part of this application a series of Verified Views have been commissioned in a number of selected surrounding areas. This includes views along the River Liffey, O'Connell Street (ACA) and Moore Street. The accompanying *TVIA* assesses the visual impact of the development on the character of these places and concludes the following: "*The proposed development's effects on the townscape – in terms of its character, environmental quality, visual amenity and function (especially in relation to pedestrian permeability and activity) – **would be overwhelmingly positive***." **[Our Emphasis]**

	• The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site. • The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of existing rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines. The scale and pattern of existing streets, squares, lanes and spaces should be considered. • The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting. • The suitability of the proposed design to its intended land use and the wider land-use character of the area, along with its relationship with and contribution to the public realm. • The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River Liffey and many quality open spaces that contribute positively to the cityscape and urban realm, the settings of protected structures, areas of special interest and important views and that the design incorporates high quality detail, materials and craftsmanship. • The need to protect and enhance natural features of the site, including trees and any landscape setting. • The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling.	An assessment of the levels of daylight and sunlight received by the proposed development and surrounding buildings was also carried out as part of this Application. The *Daylight and Sunlight Assessment Report* concludes: "*In conclusion, urban regeneration in the heart of the capital is challenging to achieve without some degree of non-compliance with the BRE Guidelines for daylight and sunlight. However, the proposed development strikes a favourable balance, performing well in both overall scheme quality and its impact on neighbouring properties. This sustainable design makes effective use of an underutilized city-centre site*."

	• The main routes which should be distinguished by exploiting vistas, key buildings and landmarks with the activities and functions of the places made visible, thus bringing a sense of liveliness to spaces. • Landmark features which can be used to give treatment to main entrances to a development, complement open spaces and assist in place-making and identity.	
15.4.3	*Sustainability and Climate Action* Good design has a key role to play in both reducing waste and emissions which contribute to climate change. These issues must be considered from the outset of the design process. Development proposals will be expected to minimise energy use and emissions that contribute to climate change during the lifecycle of the development with an aspiration towards zero carbon, and ensure the reduction, re-use or recycling of resources and materials, including water, waste and aggregates. To minimise the waste embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new build. See Section 15.7 for further details on energy requirements. Key sustainable design principles to consider are (See also Section 15.6 on Green Infrastructure): • Buildings should be designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies.	The proposed development embeds sustainability design principles. A *Climate Action, Energy and Sustainability Statement,* which is submitted herewith, details the strategy to address the various climate mitigation actions in the built environment. The proposed development has been designed in line with the principles of the energy hierarchy, Be Lean, Be Clean &Be Green by utilising passive strategies such as an energy efficient envelope where possible within the limitations of the Protected Structures and employing renewable energy systems such as high efficiency heat pumps and solar panels. Please refer to *Storm Water Management Plan* which has been prepared in accordance with the Council's Surface Water Management Guidance. SuDS elements were incorporated as much as possible given the central location and existing 100% hardstanding area of the site. The proposed development seeks to promote biodiversity and increase natural habitat variety through the provision of numerous green roofs and the planting of native species and pollinator friendly species. The biodiverse roofs will incorporate wildflower and meadow-type vegetation which will create a rich environment that attracts pollinators, invertebrates, and the fauna that depend on

	• Design should optimise natural or heat recovery ventilation, minimise overshadowing and minimise glare and excessive solar gain. • Materials should be selected which are sustainably sourced and existing materials re-used and recycled wherever possible. The use of green building materials and low embodied energy products such as low carbon cement and recycled materials is encouraged. • Design should enhance biodiversity and provide for accessible open space and landscaping which enhances the ecological value of a site. Greening measures should be included such as the incorporation of green roofs and walls, planting and trees. See also policies as detailed in Chapter 10. • Developments should incorporate a Surface Water Management Plan in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance – see policy SI25. • New public and private spaces must incorporate proposals for Sustainable Drainage Systems (SuDS) in their design, where appropriate, in accordance with the Council's Guidance Document for implementing SuDS Solutions (2021). See also Appendix 12 and policy SI22 and SI23. • For larger schemes, consideration should be given to district heating schemes and combined heat and power (CHP) – see policy CA11, CA15, CA16, CA17, CA18 and Section 15.7.2 below.	them. Features such as pollinator-friendly plants and invertebrate habitats will be integrated to sustain this ecosystem, fostering biodiversity in an urban setting. Please refer to the *Landscape Design and Access Statement* for more details. In the interest of maintaining the character of the existing buildings, features of particular architectural interest within the building range which will be retained and featured within the refurbished buildings are set out in Section 8 of the *Architectural Heritage Impact Assessment.* As detailed in Section 6 of the *Climate Action, Energy & Sustainability Report,* given the location of the subject site within the city centre, where there is limited potential for utility connections, and given its location outside the district heating zones, it is not currently deemed viable to connect to an external district heating system. The site will utilise high efficiency heat pumps to provide a communal hot water system within the development and if a district heating network became available within the area, a future connection could made with the provision of a hydraulic break and heat exchanger within the development.

15.4.4	*Inclusivity and Accessibility* An inclusive environment is one which values diversity and difference and encompasses the needs of a wide range of user groups, as well as being sufficiently flexible and versatile to be able to adapt to diverse and changing needs and life circumstances. Development proposals, including all new large scale developments, whether they relate to new buildings, public realm works, changes of use or alterations to existing buildings, must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities. Within new buildings and spaces, this will include consideration of issues such as provision of level circulation, lifts, doors widths, surface finishes, signs and information. The needs of occupants of different ages and stages of life should also be considered, ensuring form, construction and internal arrangement of the building will enable future adaptability. Access to the environment should also consider ways in which services and information can be provided to meet the needs of all users. All public buildings should ensure appropriate Development Standards | Chapter 15 562 disability access, including disability car parking where feasible. The Council will support the retrofitting of public buildings where appropriate to ensure optimal accessibility. The historic environment poses particular challenges for fully delivering all-inclusive access, however, there will almost always be scope to improve access for all without compromising the character of an existing structure of special interest – detailed advice is provided in the	The proposal has been designed to comply with the applicable standards set out in Part M of the building regulations. Careful consideration has been given to enable universal access to the existing structures whilst minimising alterations to the Protected Structures. Please refer to the *Architectural Design Statement* for more details.

	Architectural Heritage Protection Guidelines for Planning Authorities re-issued by the Department of Arts, Heritage and the Gaeltacht (DAHG) in 2011. Access to the environment in this context, may not just be about physical access, but should also consider the ways in which services and information can be provided to meet the needs of all users. See also Section 15.15.2.5 and 15.15.2.6. Dublin City Council will have regard to the Universal Design Guidelines for Homes in Ireland issued by the National Disability Authority and Housing Options for our Ageing Population, issued by the Department of Housing, Local Government and Heritage and the Department of Health, the National Disability Authority's Building For Everyone: A Universal Design Approach 2012 and will seek to encourage the implementation of best practice standards with regard to access in relation to both indoor and outdoor environments. Part M of the Building Regulations sets out standards to ensure that buildings are accessible and usable by everyone, including the aged, people with disabilities and people with children. The Technical Guidance Document in relation to Part M provides guidance on the access requirements for public buildings and for residential dwellings. Volume 2 of the Development Plan, under Appendix 5 Transport and Mobility: Technical Requirements, provides a list of requirements for retail and commercial planning applications.	
15.4.5	*Safe and Secure Design* The relationship between buildings and their adjoining spaces strongly influences the sense of personal safety and design plays a key role in ensuring that spaces are well	The proposal includes for an increase in active street frontage/ passive surveillance along all sides of the building. The widening and activation of William's Lane will increase security through an increase in footfall and passive surveillance.

	designed and have appropriate passive surveillance. All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007). New developments and refurbishments should be designed to promote safety and security and avoid anti-social behaviour by: • Maximising passive surveillance of streets, open spaces, play areas and surface parking. • Avoiding the creation of blank facades, dark or secluded areas or enclosed public areas. • Eliminating leftover pockets of land with no clear purpose. • Providing adequate lighting. • Providing a clear distinction between private and communal or public open space, including robust boundary treatment. • Enabling residents to watch over the entrance to their home; recessed entrances should be avoided and front doors should also be overlooked from other houses or from well-trafficked public areas. • Locating back gardens next to other back gardens or secure private areas rather than on to roadways or other public areas. • Ensuring that the layout and design of roads within residential areas encourages appropriate traffic volumes and speeds. • Providing clear and direct routes through the area for pedestrians and cyclists with safe edge treatment, maintaining clear sight lines at eye level and clear visibility of the route ahead.	

	• Using materials in public areas which are sufficiently robust to discourage vandalism. • Avoiding the planting of fast-growing shrubs and trees where they would obscure lighting or pedestrian routes; shrubs should be set back from the edge of paths. • Consulting with An Garda Síochána crime prevention design advisor where appropriate; Dublin City Council will also have regard to the Guidelines on Joint Policing Committees as established under the Garda Síochána Act 2005 as amended (2014), in order to ensure safe and secure communities. On housing developments over 100 units, the Council will require the submission of a Community Safety Strategy (see objective QHSNO15) which would set out the design features incorporated to address the above measures to ensure a high level of safety and security is maintained including, overlooking, passive surveillance, street lighting and clear accessible routes.	
15.5.1	*Brownfield, Regeneration Sites and Large Scale Development* Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale, regeneration and brownfield development: • To encourage innovative, high quality urban design and architectural detail in all new development proposals. • To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.	The proposed development is a Large-Scale Residential Development and has been designed to incorporate the measures set out in Section 15.5.1 as set out throughout the application documentation, especially the *Architectural Design Statement.*

	• To respect and enhance existing natural features of interest. • To contribute to the streetscape creating active and vibrant public realm. • To create animation and create activity at street level and vertically throughout the building. • To provide for appropriate materials and finishes in the context of the surrounding buildings. • To ensure land contamination is appropriately dealt with and mitigated against. • To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network. • To create new compositions and points of interest. • To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area. • To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site. • To prioritise pedestrian and cycle movements in connection with public transport infrastructure. • To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes. • To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks. • Ensure waste management facilities, servicing and parking are sited and designed sensitively to	

	minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.	
15.5.2	*Infill Development* Infill development should complement the existing streetscape, providing for a new urban design quality to the area. It is particularly important that proposed infill development respects and enhances its context and is well integrated with its surroundings, ensuring a more coherent cityscape. As such Dublin City Council will require infill development: • To respect and complement the prevailing scale, mass and architectural design in the surrounding townscape. • To demonstrate a positive response to the existing context, including characteristic building plot widths, architectural form and the materials and detailing of existing buildings, where these contribute positively to the character and appearance of the area. • Within terraces or groups of buildings of unified design and significant quality, infill development will positively interpret the existing design and architectural features where these make a positive contribution to the area. • In areas of low quality, varied townscape, infill development will have sufficient independence of form and design to create new compositions and points of interest.	Please refer to the *Architectural Design Statement* and the *TVIA* for details on how the proposed development complies with the criteria for infill development. Waste storage rooms and majority of bicycle parking spaces are located within the building and are not visible from the street. No car parking facilities are proposed within this application.

	• Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts in the surrounding neighbourhood.	
15.5.3	*Alterations, Extensions and Retrofitting of Existing Non – Domestic Buildings* Dublin City Council will seek to ensure that alterations and extensions will be sensitively designed and detailed to respect the character of the existing building, its context and the amenity of adjoining occupiers. In particular, alterations and extensions should: • Respect any existing uniformity of the street, together with significant patterns, rhythms or groupings of buildings. • Not result in the loss of, obscure, or otherwise detract from, architectural features which contribute to the quality of the existing building. • Retain characteristic townscape spaces or gaps between buildings. • Not involve the infilling, enclosure or harmful alteration of front lightwells. • Incorporate a high standard of thermal performance and appropriate sustainable design features. In addition to the above, alterations and extensions at roof level, including roof terraces and set back floors, are to respect the scale, elevational proportions and architectural form of the building. Key considerations include:	Please refer to the *Architectural Design Statement* and *Architectural Heritage Impact Assessment*. The design of the elevations of the proposed development has been substantially influenced by its context. As described in the *TVIA*, the development is masked by its context in most sensitive viewpoints. Where it is visible, the shoulder levels and building heights respect existing uniformity of building height patterns. The careful arrangement of the newly proposed buildings ensures that the protected structures retain their architectural features. The Protected Structures will be retrofitted with internal linings to improve thermal performance and appropriate sustainable design features. Please refer to the *Storm Water Management Plan* which demonstrates that the proposed green and blue roofs are proposed in line with DCC's *Green & Blue Roof Guide (2021).* Please refer to the *Telecommunications Report* prepared by Independent Site Management and the proposed drawings prepared by Henry J Lyons for locations of the proposed telecommunications equipment.

	• New development will respect terraces or groups of buildings with a consistent roofline. • Development will not result in the loss of roof forms, roof coverings or roof features (such as chimney stacks) where these are of historic interest or contribute to local character and distinctiveness. • Green roofs should be incorporated wherever they accord with the above, are structurally viable and have no adverse impact on historic structures – see Appendix 11. • Minor external additions to buildings such as plant, telecommunications and other equipment and associated cables and fixings shall be concealed within the building envelope where feasible or designed and sited to minimise their visual impact. All redundant equipment should be removed prior to installation of new equipment.	
15.5.5	*Density* Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 guidelines which seek to consolidate development within existing urban areas. Higher density development allows land to be used more efficiently, assists in regeneration and minimises urban expansion. Higher densities maintain the vitality and viability of local services and provide for the critical mass for successful functionality of public transport facilities. New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the	Please refer to the response provided to Section 3.2 of Appendix 3 below.

	existing character, context and urban form of an area and seek to protect existing and future amenity. An urban design and quality-led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban villages and neighbourhoods. All proposals for higher densities must demonstrate how the proposal contributes to place-making and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods. Refer to Appendix 3 for further details.	
15.5.7	*Materials and Finishes* Materials and finishes should be selected to ensure longevity throughout the lifetime of the development. All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application. As such, Dublin City Council will require developments: • To ensure materials and finishes complement the existing pallet of materials in the surrounding area. • Promote durability to ensure a good visual appearance over time. • The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of anti-social activity. To support the use of structural materials that have low to zero embodied energy and CO_2 emissions as well as the use of sustainably sourced building materials and the reuse of demolition and excavated materials.	The selection of materials for the development has been carefully considered. Brick has been selected as the predominant street facing material complementing the existing pallet of materials in the surrounding area and promoting durability as well as ensuring a good visual appearance over time. Please refer to Section 3.4 of the *Architectural Design Statement* for full details on the proposed material palette and finishes.

15.5.8	*Architectural Design Statements* Applications for 50+ residential units should be accompanied by an Architectural Design Statement or any application below the threshold where the planning authority consider it necessary. Statements may also be required for large scale commercial development. An Architectural Design Statement is an informative, illustrative document that clearly describes the development proposal, the context in which the development is set and the design rationale for the scheme. Design statements should analyse the site context, planning context, opportunities and constraints of the site and the conceptual and detailed design of the development including the building massing, material and finishes and building articulation, (see also Policy SC23).	Henry J Lyons have prepared an *Architectural Design Statement* which is submitted herewith.
15.5.9	*Models and Photomontages* In the case of certain large or complex planning proposals, models and photomontages of a proposed scheme to an appropriate scale will be required by the planning authority. All photo-montages submitted with a planning application or Environmental Impact Statement must include details of the type of camera and the lens used to create the image. The development should be clearly depicted. The inclusion of excessive sunshine, blue sky and any other detailing or colouring which may distort the reliability of the photomontages should be avoided.	The scheme has been modelled by Henry J Lyons and CGIs and photomontages have been prepared by 3D Design Bureau.
15.6	*Green Infrastructure and Landscaping* Planning applications will be required to address climate action as part of the overall design of the development and	Given the 100% hardstanding nature of the subject site currently, the proposed landscape measures will unequivocally bring life to the site. The proposed development seeks to promote biodiversity and increase natural habitat variety through the provision of numerous

	incorporate green infrastructure techniques. All new developments in the city are encouraged to incorporate an ecosystem services approach as a key instrument in achieving sustainable climate change action in accordance with Policy GI5 and GI6. The proposal should indicate how existing natural features of the site will inform sustainable urban form and should include the following: • Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design. • The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city's green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and 'stepping stones' to ensure biodiversity protection. • Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council's Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the	green roofs and the planting of native species and pollinator friendly species. The biodiverse roofs will incorporate wildflower and meadow-type vegetation which will create a rich environment that attracts pollinators, invertebrates, and the fauna that depend on them. Features such as pollinator-friendly plants and invertebrate habitats will be integrated to sustain this ecosystem, fostering biodiversity in an urban setting. Please refer to the *Landscape Design and Access Statement* for more details.

	ecological attributes of the site and the impact of any development should be considered prior to final design.	
15.6.2	*Surface Water Management and SuDs* All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council's Surface Water Management Guidance (see Appendix 13.) All new developments will also be required to utilise SuDS measures in accordance with Policy SI22 of the development plan. The SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer. Appendix 12 sets out further detail regarding SuDS and should be consulted by all applicants.	Please refer to the *Storm Water Management Plan* and *Engineering Assessment Report*. SuDS elements were incorporated as much as possible given the central location and existing 100% hardstanding area of the site.
15.6.3	*Green / Blue Roofs* Dublin City Council will require all new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23. Refer to Appendix 11 for further details.	Please refer to the *Storm Water Management Plan*. Green and blue roofs are proposed in line with DCC's *Green & Blue Roof Guide (2021).*
15.6.5	*Urban Greening* All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc. The provision of urban greening methods improves the overall quality of the environment and enhances the well-being in accordance with policy CA29 and GI16.	The proposed development will provide both green roofs and planting which will be located in the courtyard at basement level, the public realm along William's Lane and the rooftop terraces which accords with this policy.

15.6.6	*Sensitive Ecological Areas* Sensitive ecological areas can include protected areas such as SPA's, SAC's and NHA's as well as areas with significant tree cover and vegetation capable of facilitating habitats, or any other landscaped area with quality natural environment or sensitive natural features. Regard to such areas must be made in any development proposal. Where a proposed development adjoins a sensitive ecological area such as a river or canal bank, the area adjacent to the waterway should be retained as a riparian corridor with linkages into the wider open space network. The maintenance of natural river banks shall be required, without physical or visual encroachment on watercourses. See also policy SI10. The width of any linear park adjacent to a waterway should take into account the natural topography, existing layout and amenity potential with due allowance for riparian corridors and flood risk. In all cases, any existing blockages to permeability, such as boundaries or redundant buildings, should be resolved where possible. See Chapter 9, Section 9.5.2 and also policies SI10, SI11 and SI12, and objectives SIO7 and SIO8 on River Restoration. Full public access to lands along waterways which are in private ownership as part of any development proposal should be provided unless exceptional circumstances prevail. All of the main rivers in Dublin city have salmonid populations. Therefore, applicants should also demonstrate legal compliance to protect the watercourses and fisheries	Please refer to the *AA Screening Report* and *EcIA* for details of any sensitive ecological areas.

	from soil, silt or other material during construction and in this regard should liaise with Inland Fisheries Ireland. As many protected species inhabit Dublin's rivers, applicants should consult with the National Parks and Wildlife Service to inquire as to any consent procedures required for proposed works and to ensure that design layouts do not cause habitat loss. In the case of proposals adjacent to a canal, appropriate space should be retained for wildlife and it should also be ensured that wildlife have appropriate access to the water. Applicants should consult the Dublin City Council Biodiversity Action Plan 2021-2025 and the Dublin City Canals Plan (Waterways Ireland in conjunction with Dublin City Council, Fáilte Ireland and the Dublin Docklands Development Authority) to ascertain the implications of these plans for any such site. Regard should also be had to Planning for Watercourses in the Urban Environment Guidance (2020) produced by Inland Fisheries Ireland.	
15.6.7	*Landscape Design Rationale* Landscape design and maintenance plans will be regarded as an integral part of all development applications. The incorporation of landscape features to protect and support biodiversity and to ensure the existing landscaping and environments are protected will be required as part of all applications. Landscaping schemes must be in accordance with Dublin City Council standards for road and footpath layout, and there will be a preference for soft landscaping, where possible. Materials must be appropriate, durable and of a good quality. Careful consideration must be given to the design of hard-	Please refer to the *Landscape Design and Access Statement* submitted herewith for details of the landscape design rationale.

	surfaced areas including streets, squares, open spaces, paved areas, footpaths and driveways. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design. Areas of schemes to be taken in charge by Dublin City should be designed with reference to the palette of materials used by the local authority to ensure later maintenance and replacement of materials in the upkeep of the area by the local authority. See also Appendix 5, Section 8.2 and 8.3. Applications for substantial hard-surfaced areas must demonstrate methods of controlling and limiting surface water run-off consistent with sustainable development (see also Appendix 12 and 13).	
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. A Landscape Design Report sets out the landscape strategy for the scheme through the use of drawings, illustrations and species specification documents. A landscape report should describe the public open space and communal open space provided within a scheme to demonstrate compliance with the relevant guidelines. Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans. On sites with extensive vegetation and tree coverage, a separate tree report should also be incorporated into the landscape design report to support the retention of trees	A *Landscape Design and Access Statement* is included as part of the planning application and details the proposed communal amenity spaces, public realm improvements, materials, and the tree and planting strategy. The report also sets out the strategy for supporting biodiversity and habitats.

	where possible. Landscape proposals should also take account of the biodiversity and environmental habitats present on the site and within the surrounding area and set out proposals to enhance and protect these features (see Sections 15.6.6, 15.6.9 and 15.6.10 for further details). Landscape design reports should address the following: • The protection and incorporation of existing trees and landscape features worthy of retention. • The contribution of the proposed development to the landscape character and setting and open space amenity of the area. • The value of ecological corridors and habitats surrounding the proposed development and the potential impact on these areas. • The relationship between existing green corridors, public open spaces or area of high ecological values. • The detail and specifications for materials, finishes and maintenance details. • The integration of sustainable urban drainage systems such that landscaping plans may include associated biodiversity areas or wetlands which can reduce surface water run-off – see Appendix 12 and 13. • The hierarchy of different types of planting throughout the development in order to give visual variety. Green roofs, walls and permeable surfaces will be encouraged and required in certain instances (see Chapter 10 and Appendix 11). • The details of ecosystems services and biodiversity including pollinator friendly approach.	

	• The maintenance and management strategy for the landscaped features.	
15.7.2	*District Heating* District heating systems will be supported in areas identified in Chapter 3: Climate Action. In these areas, all applications should be designed to cater for district heating systems. The details of the heating system proposed and compatibility with the district heating network should be specified in all planning applications. Applicants are requested to submit a Climate Action and Energy Statement with all planning applications in this zone – see below. Where district heating systems are not yet in operation, the applicant is required to demonstrate how the proposed heating system of the development can connect and facilitate future use of the district heating system once in place, see policy CA15, CA16, CA17 and CA18 for further information.	Please refer to the response provided for Policy CA8.
15.7.3	*Climate Action and Energy Statement* In order to comply with the policies set out in Section 3.5.2 'The Built Environment' and Section 3.5.3 'Energy' of Chapter 3, proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement. The purpose of this statement is to demonstrate how low carbon energy and heating solutions have been considered	A *Climate Action, Energy & Sustainability Report* prepared by OCSC is submitted herewith which demonstrate how low carbon energy and heating solutions have been considered as part of the design of the proposed development.

	as part of the overall design and planning of the proposed development. Having regard to the above, the statement, which shall be prepared by a certified engineer, shall address: • the technical, environmental and economic feasibility of on-site renewable energy generation including solar PV and small scale wind power; • the technical, environmental and economic feasibility of at a minimum, the following high-efficiency alternative energy supply and heating systems: • decentralised energy supply systems based on energy from renewable and waste heat sources; • co-generation (combined heat and power); • district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources; • heat pumps; • include an assessment of embodied energy impacts.	
15.8.1	*Quality/Making Sustainable Neighbourhoods* Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including 'Quality Housing for Sustainable Communities: Design Guidelines' (2007), 'Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities' (2009) and accompanying 'Urban Design Manual (2010)', Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads and	Sections 6.8 of this Report responds to the *'Quality Housing for Sustainable Communities: Design Guidelines' (2007)*. We note that the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)* supersede the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, *Urban Design Manual: A Best Practice Guide*. Please see Section 6.8 of this Report for further details.

	Streets (2019) and Design Manual for Quality Housing (2022).	The proposed layout for the development has been designed in accordance with DMURS. Please refer to the *DMURS Statement of Consistency* which provides details of how the proposed development complies with DMURS.
15.8.2	Community and Social Audit Applications for large residential developments or mixed use developments should include provision for community type uses. All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Each of the subsections below shall be assessed as part of the community and social audit. A community and social audit should address the following: • Identify the existing community and social provision in the surrounding area covering a 750m radius. • Assess the overall need in terms of necessity, deficiency, and opportunities to share/ enhance existing facilities based on current and proposed population projections. • Justify the inclusion or exclusion of a community facility as part of the proposed development having regard to the findings of the audit. Where it is determined that new facilities are required the following design criteria should be considered: • The design of the facility should allow for multi-functional use.	A *Social Infrastructure Audit* has been prepared by Turley which assesses the provision of community and social facilities in the vicinity of the subject site. The Audit concludes the following: "*The Social Infrastructure Audit has identified a broad range of services and facilities to support the proposed development commensurate to the site location within the Dublin City area.* *In light of the developer's proposed provision of community/cultural space and student amenity space, no need has been identified to provide any additional social infrastructure facilities as part of the proposed development.*"

	• Community facilities must be located so that they are conveniently accessible by both residents and others who may have reason to use the facility. • Community facilities should be well integrated with pedestrian and cycle routes and, where they serve a wider community, located on or close to a quality public transport route. • Re-development proposals on sites containing a pre-existing community use / and / or recreational use should ensure that this use in terms of floor / ground space is no less than that on-site prior to redevelopment, and if possible, should represent increased provision. • Community facilities must be accessible to all members of society including persons with disabilities and the elderly.	
15.8.5	*Public Realm* All residential developments that include lands within the public realm must agree, subject to a letter of consent, with the planning authority that the proposed scheme is compliant with the public realm guidance as set out on the Dublin City Council website. https://www.dublincity.ie/residential/planning/strategic-planning/public-realm-strategy Details of road widths, public footpaths and accessibility can be found in Appendix 5 of the plan. Where new public spaces that will contribute to the public realm of an area are proposed, applicants must demonstrate that such spaces provide accessibility to all, are easy to	A Letter of Consent has been received from Dublin City Council for this LRD Application facilitating the proposed works to the footpath, laneway and drainage connection along Prince's Street North and William's Lane.

	navigate and create safe and secure environments. Please see guidance on street furniture, public lighting and accessibility in this regard as set out in Section 15.17.	
15.8.6	*Public Open space* All residential development is required to provide for public open space. Regard should be had to the guidance set out in Section 15.6.12 above regarding landscaping requirements, and also Section 15.6 on Green Infrastructure. The public open space requirement for residential developments shall be 10% of the overall site area as public open space. In the case of residential developments on Z12 and Z15 zoned lands, additional open space is required in order to retain the existing open character of the lands. A total of 25% public open space will be required within these zones.	Please refer to the response provided to Policy GI28.
	Financial Contributions in Lieu of Open Space Public open space will normally be located on-site, however, in some instances it may be more appropriate to seek a financial contribution towards its provision elsewhere in the vicinity. This would include cases where it is not feasible, due to site constraints or other factors, to locate the open space on site, or where it is considered that, having regard to existing provision in the vicinity, the needs of the population would be better served by the provision of a new park in the area (e.g. a neighbourhood park or pocket park) or the upgrading of an existing park.	Due to the limited size of the site, it would be unachievable to provide public open space of high-quality on site. However, the Applicant proposes significant upgrade works at their own cost along William's Lane which will be to the significant benefit of the wider City.

	In these cases, financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as set out in the City Council Parks Programme, in fulfilment of this objective. Financial contributions in lieu of public open space will only be applicable in schemes of 9 or more units. The details on the value of the contribution in lieu and other exemptions are set out in the Dublin City Section 48 Development Contribution Scheme and any future amendments thereof.	
15.8.10	*Gated Communities* Dublin City Council will resist gated communities within the city and there is a general presumption against same in order to promote permeability and accessibility in the urban area. Where a gated scheme is proposed, the applicant must demonstrate the operational management strategy for the development and clearly set out the functionality of the gate mechanism proposed. The ongoing management and maintenance of the development will need to be demonstrated to avoid any situations where the mechanism malfunctions. The applicant will also be required to demonstrate how the gate will function in respect of traffic movements and the potential wait time on the public road. Sufficient car parking will also need to be provided in order to prevent overspill car parking onto the public road.	The only areas within the subject scheme that will be accessible by members of the public will be the enhanced public realm along William's Lane, the retail units and the café/restaurant. As with all Student Accommodation, their spaces will be private and not accessible to the public.

15.13.1	*Student Accommodation* The City Council supports the provision of high-quality, professionally managed, purpose-built third-level student accommodation, either on campus or in accessible locations adjacent to quality public transport corridors and cycle routes, in a manner which respects the residential amenities of the locality. Proposals for student accommodation shall be in accordance with Policy QHSN45. Student accommodation should make a positive contribution to the built environment, in terms of design quality, scale, height and the relationship to adjacent buildings. The external layout, including any necessary security arrangement, should be designed to avoid isolating developments from the surrounding community. In assessing proposals, the planning authority will have regard to the pattern and distribution of student accommodation in the locality, and will resist the overconcentration of such schemes in any one area, in the interests of achieving a sustainable mix of development, whilst also providing for successful urban regeneration, good public transport / cycling / walking connectivity, and the protection of residential amenity. All applications for student accommodation must be accompanied by documentation outlining how the scheme will be professionally managed including confirmation that all occupiers will be students registered with a third-level institution.	Please see Section 8.2.1 of this Report for details.

	Documentation must also outline how the scheme will support integration with the local community, through its design and layout. Permissions for student housing will be subject to a condition requiring planning permission for a change of use to other types of residential accommodation. The provision of Part V (Social and Affordable Housing) of the Planning Acts do not apply to student accommodation in the City Council area. In assessing applications for purpose built student accommodation the planning authority will have regard to the following key factors: • The location is appropriate in terms of access to university and college facilities by walking, cycling or public transport. • The proposal will not result in an excessive concentration of student accommodation (including that in the private rented sector) to an extent that would be detrimental to the maintenance of balanced communities or to the established character and residential amenity of the locality. It is preferable in principle that student needs are met as far as possible in purpose built and managed schemes rather than the widespread conversion of family housing. In general, such provision can take place at relatively high densities. Open space and car parking provision can be tailored to reflect the nature of the proposed use. However, these considerations should not compromise design quality. Developments should be close to the universities and colleges and accessible by public transport.	

	In assessing the degree of concentration of student accommodation, the Council will take into account the nature of the locality in terms of mix of land use and housing types, the existing and proposed number of students in the locality. To assist in this assessment the applicant will be requested to submit evidence of existing, proposed and under construction student accommodation developments within an area, including a map showing all such facilities within 1km of a proposal.	
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. The cluster model shall provide minimum bedroom sizes as follows:	The proposed development will see the delivery of 267 No. standard rooms, 5 No. accessible rooms, 30 No. studios, 10 No. accessible studios and 2 No. twin studios. Each standard room will be a minimum of 12 sq m and each accessible room and studio type will be a minimum of 25 sq m. All bedrooms will have their own en-suite. The proposed cluster type will range is 5 No. students to 8 No. students per cluster (excluding 7 No. student clusters) and varies per floor level. Please see Section 8.2.1 of this Report and the Housing Quality Assessment submitted herewith for further details.

	Table 15-7: Minimum Bedroom Sizes for Student Accommodation Clusters **Bedroom Type** / **Bedroom Size (min)** / **Bedroom Size including En-Suite (min)** Single Study / 8 sq. m. / 12 sq. m. Twin Study / 15 sq. m. / 18 sq. m. Disabled Study / - / 15 sq. m. An alternative 'studio' model may also be considered in certain circumstances within a larger student accommodation scheme. These studio units can accommodate single or double occupancy and shall comprise of en-suite bathroom facilities and private kitchenettes/cooking facilities. These studio units shall provide a minimum of 25 sq. m. and a maximum gross floor area of 35 sq. m.	
15.13.1.2	*Daylight and Sunlight* Student accommodation should be designed to give optimum orientation in terms of daylight to habitable rooms. Given the nature of student occupancy, the residential standards in relation to dual aspect may be relaxed. Proposed developments shall be guided by the principles and standards set out in Appendix 16.	Please refer to Section 8.2.1 of this Report.
15.13.1.3	*Communal Facilities* Communal facilities and services which serve the needs of students shall be provided both internally and externally within a scheme. Adequate external open space of suitable orientation should be provided within developments for the amenity of students. Generally ground floor courtyards that achieve appropriate daylighting and sun lighting will be required. In	Please refer to Section 8.2.1 of this Report.

	certain circumstances, terraces and roof gardens will be considered but only in addition to appropriate ground level amenity provision. The provision of indoor communal space can be broken down to indoor amenity spaces such as cinema rooms, study rooms, games rooms etc. and indoor services such as laundry facilities, caretaker/ security and refuse facilities etc. Where accommodation is provided on-campus, communal facilities will be assessed on a case-by-case basis having regard to the level of and access to on campus amenity. Details are to be provided as part of the application. All proposals must provide appropriate indoor and outdoor communal and recreational facilities for students at a combined level of at least 5-7 sq. m. per bedspace. In addition, shared kitchen/living/dining rooms shall be provided within each student cluster, based on a minimum 4 sq. m. per bed space. This is in addition to any circulation space and communal space provided. **Table 15-8: Communal Requirements for Student Accommodation Clusters** Communal Requirement: Area Indoor / Outdoor: 5-7 sq. m. per bedspace Kitchen / Living / Dining: 4 sq. m. per bedspace Total: 9-13 sq. m. per bedspace	
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	Please refer to Section 8.2.1 of this Report.

	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.	
15.13.1.5	*Temporary Use as Tourist Accommodation* The use of Student Accommodation as temporary tourist accommodation will be considered outside the normal academic year. The tourist / visitor accommodation shall only be occupied for short-term letting periods of no more than two months and shall not be used as independent and separate self-contained permanent residential units. Appropriate conditions will apply.	Please refer to the response provided to Policy CEE26.
15.15.1.3	*Best Practice* All archaeological reports submitted with a planning application and/or prepared in compliance with planning permission shall be produced in accordance with Excavation Reports Guidelines for Authors, (NMS, 2006). All development shall be carried out in accordance with the Framework and Principles for the Protection of the Archaeological Heritage, 1999 and other National policy and guidelines for the archaeological heritage.	Please refer to the *Archaeological Assessment* which was produced in accordance with the relevant guidelines.

	Archaeological work shall be carried out in accordance with current archaeological best practice policy and guidance published by the National Monuments Service, and with reference to technical guidelines issued by the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland. Where National technical best practice guidelines are unavailable, internationally recognised best practice guidance may apply. Where archaeology services are incorporated into fixed priced contracts, the contract shall be prepared with regard to Standard and Guidance Procedures for Archaeological Services in Fixed Price Contracts used in the Republic of Ireland, (IAI, 2012). Archaeological work shall be undertaken in accordance with the Policy and Guidelines on Archaeological Excavation, (NMS, 1999). All archaeological monitoring shall be done under licence. Archaeological excavations shall comprise a specialist-led environmental site strategy and conducted in accordance with Environmental Sampling: Guidelines for Archaeologists, (IAI, 2007).	
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.	Not applicable. The development area already included an extensive basement across its entire footprint. Furthermore, the site is not located in the medieval core of the city.

15.15.1.5	*Industrial Heritage* Archaeological assessments shall have regard to the Dublin City Industrial Heritage Record and evaluate any above and below ground industrial heritage features. Where industrial remains are identified, the application may be required to engage the services of an industrial heritage expert to prepare a specialist report.	Please refer to the accompanying *Industrial Heritage Assessment* prepared by Fred Hammon.
15.15.1.7	*Archaeological Excavation* When planning permission for development involving sub-surface excavation is granted, the applicant's attention will be drawn to the legal obligation to report the discovery of archaeological finds to the National Museum of Ireland.	Please refer to the *Archaeological Assessment* submitted herewith.
15.15.1.8	*Archaeological Mitigation* Where a site has tested positive for archaeology, in situ remains shall be evaluated for preservation in situ. In situ medieval structures shall be carefully evaluated with the aim of preservation and presentation in situ within the new development. Where preservation in situ is not feasible, sites of archaeological and/or industrial heritage interest shall be subject to a full archaeological excavation and post excavation analysis according to best practice in advance of redevelopment. Where an excavation is the agreed mitigation strategy the licenced archaeological director shall submit bi-weekly	Please refer to the *Archaeological Assessment* submitted herewith.

	briefing notes to the City Archaeologist for the full duration of the excavation. A preliminary excavation report in digital and hard copy shall be submitted to the planning authority for the attention of the City Archaeologist within four weeks of the completion of the excavation or of each phase of the excavation and a detailed final report submitted within twelve months of the completion of the excavation. The results of all archaeological excavations shall be evaluated for publication either as a monograph or scholarly article, within 1 year after archaeological site completion. Information about medieval sites will be disseminated to the public through the Friends of Medieval Dublin or similar free event within 1 year of site completion. The excavation archive shall be prepared in accordance with Dublin City Archaeological Archive (DCC, 2008) and submitted to the Dublin City Archaeological Archive within 1 year of excavation completion.	
15.15.1.9	*Preservation In Situ* Where a proposed development is at a known Monument / Site or within an Archaeological Zone, discussions about the retention of features within / below developments (preservation in situ) and mitigation options shall take place at the outset of project planning and shall be reviewed at each stage of the project. Before considering whether an archaeological site can be appropriately retained within a development (preserved in situ), the following shall be addressed: 1. The current state of preservation of the archaeological finds and deposits and how they contribute to the site's significance. 2. The likely development and how	Please refer to the *Archaeological Assessment* submitted herewith.

	these will affect the site's significance. 3. For sites containing waterlogged archaeological remains, the availability and quality of water on the site and how sensitive this hydrological regime is to changes. Preservation assessments shall form a discrete part of desk-based assessments and site evaluation reports. Consideration shall be given to the impact of any development proposal on waterlogged deposits that could be potentially threatened through changes to the hydrological regime, water levels and quality. Test excavations shall be carried out to investigate and evaluate the deposits and the artefacts they contain in sufficient detail to establish their significance, their state of preservation and their susceptibility to adverse impact from proposed development. Preservation assessments (including characterisation of the environmental conditions of the deposits) to form a regular part of the evaluation methodology for sites where retention within the development is likely to be the final mitigation outcome. When the state of preservation of material is poor, and further burial following development is likely to cause additional damage to that material, excavation of the archaeological remains to recover their remaining significance and evidential value is the most appropriate strategy. Where sites contain waterlogged archaeological remains, water environment studies to determine water availability and water stresses may be required. If the condition of surviving material and deposits is good and development risks are not going to cause a change to below ground environments (including site hydrology), then harm to significance may be limited. In these instances, the retention of the site and its future management as part of the	

	development may be achievable. For such sites, monitoring will not normally be necessary. Where there is concern about potential impacts of development on well preserved archaeological remains, it is good practice for monitoring to only be considered appropriate if a mitigation scheme is in place to manipulate water levels or provide access for future excavation if environmental conditions deteriorate.	
15.15.1.10	*Piling and Archaeology* Where piling is being considered as part of a foundation design on a site containing archaeological remains, a range of site-specific information will be needed to enable sound decision taking with regard to the particular technical issues raised by the use of piled foundations. · The applicant shall provide sufficient information demonstrating an adequate understanding of the significance of the archaeological site and assessment of potential harm to that significance arising from the development. · The planning application shall include an appropriate desk-based assessment and where necessary the site will be evaluated by way of archaeological testing in advance of the grant of permission. · Sufficient geotechnical site investigation shall be undertaken in accordance with Eurocode 7, early in the design process to ensure that appropriate engineering information is available to allow for a flexible foundation design and reduce the impact on archaeological remains.	Please refer to the *Archaeological Assessment* submitted herewith.

	· The developer shall consider foundation options and inform the piling contractors that archaeological remains are present on site before they tender. Technical aspects associated with piled foundations will be appropriately assessed. These include but are not necessarily limited to: 1. The potential for the particular pile type utilised to damage archaeological deposits. 2. The cumulative impact of successive piling on a site resulting in damage to so much of a site that future re-examination would not be worthwhile. 3. The potential for piling to change the site hydrology, draining waterlogged deposits.	
15.15.1.11	*Recording of Historic Buildings* Buildings on the first edition OS that are not protected structures shall be recorded as part of the archaeological assessment that accompanies the planning application. Appropriate specifications for the recording of historic buildings will be determined in consultation with the City Archaeologist. Records of historic buildings will inform decisions relating to the approval or implementation of a scheme of development as part of the planning process or to document buildings, or parts of buildings, which will be lost as a result of demolition or alteration.	On the 1847 Ordnance Survey Map the site is occupied by seven terraced properties fronting onto 'Abbey Street' and associated buildings and warehouses on Prince's Street. The area was redevelopment in the 19th century, prior to its destruction during the Easter rising 1916. There are no upstanding buildings predating 1847 surviving on the site. Examination of the basement does suggest that some of the calp limestone walls may date from the terraced houses or possibly the 19th century office constructed for Fitzgerald's wine merchants, and it is probable that further walls relating to early basement are present. It is proposed to undertake a detailed archaeological inspection of the southern basement and record and sections of walling that may

		be associated with the original 18th century cellars prior to the commencement of construction. Ground disturbances will be monitored by a suitable qualified archaeologist. If any features of archaeologist potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation in-situ or by record, with approval from the National Monuments Service of the DoHJGH and the Dublin City Archaeologist.
15.15.2.1	*Architectural Conservation Areas* Development in these zones must respect the existing character of the area and protect and enhance the setting and appearance of the streetscape and / or protected features. Details on the requirements for development within ACA's are set out in Policy BHA7 and BHA8 as set out in Chapter 11 as well as in the specific Framework for each ACA. Larger scale applications within or immediately adjacent to an ACA will need to provide an assessment, carried out by a suitably qualified conservation professional, of the impact of the development on the ACA the streetscape and the buildings in the immediate vicinity and demonstrate that there will be no material, adverse impact arising. Such an assessment should be accompanied by appropriate drawings, imagery and photomontages of the site and the surrounding context to assist the planning authority in assessing the impacts of the development.	The subject site is positioned immediately adjacent the O'Connell Street and environs ACA. Please refer to Table 7.1 of the *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects for demonstration of compliance with Policy BHA7 and BHA8.
15.15.2.2	*Conservation Areas*	The restoration and reoccupation of the front building range, part of the Printing Hall and part of the façade along Prince's Street North will have a positive impact on the adjacent ACA. The new buildings

	All planning applications for development in Conservation Areas shall: • Respect the existing setting and character of the surrounding area. • Be cognisant and/ or complementary to the existing scale, building height and massing of the surrounding context. • Protect the amenities of the surrounding properties and spaces. • Provide for an assessment of the visual impact of the development in the surrounding context. • Ensure materials and finishes are in keeping with the existing built environment. • Positively contribute to the existing streetscape Retain historic trees also as these all add to the special character of an ACA, where they exist. Further guidance on Conservation Areas is set out in Chapter 11 Section 11.5.2.	are set back from the primary streets to reduce the impact on the streetscapes and adjacent Protected Structures. Furthermore, the new elements are finished in materials selected to complement the existing setting including brick and metal cladding. The Verified Views accompanying this submission, prepared by 3D Design Bureau, demonstrate that the proposed additions will alter the setting but will not injure the visual amenity of the ACA. Please refer to the *TVIA* prepared by ModelWorks for further comment. The proposed retention and restoration of the front-range neoclassical structures, part of Prince's Street North loading bay façade, and part of the industrial Printing Hall constitutes a positive outcome for the area and will ensure that the memory of the cultural association with the former newspaper and printing works is retained on the site.
15.15.2.3	*Protected Structures* All planning applications for development/works to Protected Structures must provide the appropriate level of documentation, including an Architectural Heritage Impact Assessment, in accordance with Article 23 (2) of the Planning and Development Regulations, 2001 (as amended) and chapter 6 and appendix B of the 'Architectural Heritage Protection Guidelines for Planning Authorities' (2011), to assist in the assessment of proposals. The report should:	The *Architectural Heritage Impact Assessment* prepared by Molloy and Associates Conservation Architects has been prepared in accordance with Article 23 (2) of the *Planning and Development Regulations, 2001* (as amended) and chapter 6 and appendix B of the 'Architectural Heritage Protection Guidelines for Planning Authorities' (2011). A building chronology drawing and a photographic record of historic fabric has been submitted as part of this assessment – See Appendix A & B of the *Architectural Heritage Impact Assessment.*

	• Outline the significance of the building(s) or structure(s) and their settings and an assessment of how the proposed works would impact on that significance. • Include a detailed drawn survey of the building/structure identifying all surviving original/early and later features that may contribute to its significance and associated photographic survey. • Include a conservation focused method statement and specification of works. • Details of proposed works should be clearly identified on the accompanying survey drawings by way of colour coding and/or annotated notes to distinguish clearly between the existing structure, the proposed works including demolition of existing fabric and/or features. The colour coding should also show the provenance of the historic building, including identification of the various stages of its development, identifying original, historic and later intervention. The detail required to be submitted will be dependent on the significance of the building and the nature and extent of works proposed. In assessing proposed development works (inclusive of extensions, alterations, change of use. etc.) to a Protected Structure, the Planning authority will ensure compliance with the policies, objectives and provisions of Chapter 11, Section 11.5.1 of this plan.	A report assessing its industrial heritage has been separately prepared by Fred Hammond and is included as part of this submission under the cover entitled *Industrial Heritage Survey.* Detailed drawings of the proposed works and survey drawings have been prepared by Henry J Lyons.

15.15.2.4	*Retention and Re-use of Older Buildings of Significance which are not Protected* Our built heritage is rich and varied. Much of our built heritage is not protected nor located within an ACA. The re-use of buildings/structures of significance is a central element in the conservation of the built heritage of the city and important to the achievement of sustainability. In assessing applications to demolish buildings/structures of significance that are not protected, the planning authority will actively seek the retention and re-use of buildings and other structures of architectural, historical, archaeological, artistic, cultural, scientific, technical, social and/or local interest or those that make a positive contribution to the character and identity of streetscapes and the sustainable development of the city; also having regard to Policies BHA 05: Demolition of Regional Rated Buildings on NIAH and BHA 06: Buildings on Historic Maps. Where the planning authority accepts the principle of demolition, a detailed written and photographic inventory of the building may be required for record purposes.	The subject site contains two protected structures; RPS Ref. 18: Independent House, at Nos 87-90 Abbey Street Middle and the attached building to the west, RPS Ref. 8797. All structures on the site have been recorded and assessed for architectural heritage significance. Please refer to the *Architectural Heritage Impact Assessment* which presents the overall conservation strategy for the reuse of the site, which includes the removal of some of the less architectural significant structures and the retention and refurbishment of others.
15.15.2.5	*Historic Buildings and Access* In assessing planning applications which relate to protected structures, regard shall be had to the protected status of the structure and the need to protect its special character. Detailed advice is provided in the Architectural Heritage Protection Guidelines for Planning Authorities (re-issued by DAHG, 2011) and in Access – Improving the Accessibility of Historic Buildings and Places (Advice Series, DAHG, 2011).	A measured approach has been taken to alterations to improve access to the Protected Structures. It is considered appropriate that the front buildings on Middle Abbey Street are retained in use as the primary entrance to the building range. It is therefore proposed to lower the front steps, relaying the granite to create a level threshold and to introduce a platform lift inside the entrance of Independent House. The entry to Emerald Chambers contains more original features and architecturally is

	There is a need for flexibility in the use of protected structures and in making them accessible to people with disabilities, whilst respecting their architectural integrity.	more significant and consequently it is not proposed to alter this entrance. Please refer to the elevation drawings and the *Architectural Design Statement* prepared by Henry J Lyons and Item 6.6 of the *Architectural Heritage Impact Assessment* for further details.
15.15.2.6	*Barrier Free Access and Protected Structures* The creation of barrier free access to protected structures can be difficult to reconcile. Where access devices are proposed, the following information should be submitted: • An assessment of the building's access requirements, including details on the circulation and user requirements of the building. • An assessment of the impact of access devices on the special character and setting of the protected structure, particularly where architectural details such as plinths, thresholds, steps, staircases and railings, which contribute to the special interest of the building, are involved. • An assessment of alternative design options considered to ensure the proposal would represent the most sensitive access solution available. • Details of the materials and specifications of both permanent and temporary devices which should be appropriate to the location so as to reduce the visual impact of the mechanism. Creative architectural responses which represent the most sensitive access solution will be actively encouraged. Proposals should be so designed to ensure the device can be	The rational for the approach to the design of the external approach and access to the protected structures is described above. Internally, the existing stairs within the Protected Structures do not comply with current Building Regulations. To overcome this impediment to vertical circulation, the new buildings which contain universally accessible lift and stairs will be connected internally on every level. The existing stairs in both buildings and original early OTIS lift in Emerald Chambers will be retained in place. To facilitate universal access within the upper floors, it is proposed to reconfigure the internal layouts to create wider corridors. These works are also required to address fire safety requirements. Please refer to the *Architectural Design Statement* and Item 6.6 of the *Architectural Heritage Impact Assessment* for further details.

	removed without damage to the fabric of the building, where possible i.e. reversible. In certain cases, it may be necessary to locate such devices on/in less significant parts of the building. All works should retain the maximum amount of historic fabric in situ and should be designed to cause minimum interference to the historic building fabric and reduce the visual impact of the mechanism.	
15.15.2.7	*Fire Safety Works and Protected Structures* Fire protection works to protected structures relate directly to the use and requirements of a building and can have a significant impact on the character of a protected structure and require planning permission, if they give rise to significant impacts and/or alter the character of the protected structure. When considering proposals for fire safety measures, a strategic approach to fire protection works to the building will be encouraged. Uses which may diminish the special interest of a protected structure through inappropriate alterations will generally not be encouraged. Applications for fire protection works shall be guided by the principles of minimum intervention to the historic fabric and the reversibility of alterations, where achievable.	The fire safety strategy has been prepared in consultation with MSA (Michael Slattery and Associates) and an overview of the requirements is outlined in the *Architectural Design Statement* prepared by Henry J Lyons. Both Independent House and Emerald Chambers have concrete frame structures. It is considered that the existing concrete floors will not require additional fire rated upgrades. Installation of new fire rated, and acoustic corridor walls, doors and bedroom party walls will be required to meet regulatory requirements in sleeping accommodation. Sprinkler pipework will be carefully coordinated and exposed below existing ceiling levels in bedroom areas and above ceilings in bathrooms. It is noted that sprinklers are already installed within the buildings. Three firefighting shafts are necessary for accessing the complex, these have been positioned at the rear of the historic buildings, outside the footprint of the front range buildings and still within acceptable travel distances. All proposed interventions outlined above are required to meet compliance with fire safety standards, and for the successful adaptive reuse of the building range.

		Please refer to the *Architectural Design Statement* and Item 6.5 of the *Architectural Heritage Impact Assessment* for further details.
15.15.2.8	*Lighting of Protected Structures and Buildings in Conservation Areas* Well-designed exterior lighting of landmark buildings, structures and spaces can play an important role in defining the character of the built heritage. A successful lighting scheme will relate to the architectural form of the building and will sensitively utilise the detailing and features of such buildings with low wattage and/or dimmable light sources in an appropriate colour, and discreet light fixtures. It will also minimise the spillage of potential obtrusive light to adjacent areas and will avoid unnecessary over lighting, which can alter the appearance of a building or area. In considering applications for lighting schemes, the need for such schemes should be clearly established. Proposals for lighting schemes should include details of the size, type, siting, and number of fixtures and fixing methods, as well as wattage, colour of light source, light pattern and potential impact on the building material and features, and include visualisations to demonstrate the intended effects. To avoid conflict, proposals should demonstrate how lighting schemes would enhance and protect the character of an area or group of protected structures and/ or co-ordinate with any adjacent lighting schemes. Powerful wide-angled over-lighting which can diminish the architectural features of a building, its setting or surrounding area will be discouraged. Lighting schemes may not be appropriate in certain	Please refer to the *Site Lighting Report* and drawings prepared by OCSC for details.

	residential areas, as the spillage of light from lighting schemes can impact on the amenities of such areas.	
15.17.2	*Public Lighting* Public lighting assists in providing a safe and secure environment. The Council will ensure that public lighting is appropriately and sensitively designed in order to balance the requirement for adequate lighting with amenity and environmental considerations (see Section 9.5.9 of the development plan). Where significant lighting proposals are proposed, the applicant must demonstrate that the quality environment in the surrounding area is not impacted and set out details of light levels and mitigation measures as necessary. The provision of public lighting, including on public roads, shall be provided in accordance with the requirements of with the latest Public Lighting Standards IS EN13201 and further updates and should be designed to minimise the impact on protected species, such as light sensitive bat species in accordance with best practice, the National Parks and Wildlife Service (NPWS) Bat Mitigation Guidelines for Ireland (2006) and the Technical Guidance Note on Biodiversity for Development Management in Dublin City (DCC 2021). Applications for new roads and / or public spaces should ensure that the area is appropriately lit for accessibility and safety. Development proposals for public lighting shall include:	Please refer to the *Site Lighting Report* for details of the proposed lighting for the scheme and the *Construction Environmental Management Plan* for details of any lighting during the construction stage.

	• Details of the column height, siting and location of the lighting. • Details of the specific lantern type and design. • Details of lighting specification including lighting class, lux levels and energy efficiencies. • Site lighting report to assess the impact of light overspill to the surrounding area. Site lighting should also be considered throughout construction period and the impact on the surrounding properties. Details of such should be included in the construction management plan.	
15.18.1	*Construction Management* All developments comprising 30 or more housing units and commercial developments (as well as institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan. In the event of a grant of permission, and on appointment of a contractor, a final construction management plan will be required to be agreed with the Planning Authority. Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume of Construction and Demolition (C&D) waste; and Civil engineering projects which generate in excess of 500 cubic metres of waste materials used for development works on the site should also be accompanied by Construction Management Plans. The construction management plan shall set out the details of the on-site operations including traffic management (site access, deliveries and maintenance and staff parking), waste	Various documents have been prepared which make up the contents of a 'Construction Management Plan'. These include: • *Construction Environmental Management Plan* • *Transport Assessment* - Section 6 - details of traffic management during the construction stage; • *Resource Waste Management Plan*; and • *Acoustic Design Statement.*

	management, environmental impacts such as noise, air quality, vibrations and any other relevant detail associated with the development. Where appropriate, excavated material from development sites is to be reused on the subject site. The construction management plan should set out a clear timeline for the development, and details of the relevant on site contact for liaison with surrounding residents and businesses. For large construction projects (30 or more residential units of 1,000 sq. m. of commercial development), details of the site contact should be circulated to the local community, and where appropriate resident monitoring committees established for the duration of the project in order to promote best construction management and considered construction practices to protect the amenities of adjacent properties. The plan should consider the potential cumulative impacts of any adjacent development project under construction or planned for construction within the timeframe of the project, and set out appropriate mitigation measures to manage such cumulative impacts. In reviewing construction management plans, the planning authority will have regard to the following: • Hours of operation. • Construction/phasing programme. • Community Liaison Strategy • Traffic Management Plan including employee parking and movements. • Noise, Vibration, Air Quality and Dust Monitoring and Mitigation Measures. • Cumulative impacts.	

	• Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats. • The management of construction and demolition waste included as part of a Construction and Demolition Waste Management Plan • Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater). • A water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains. • Details of a water quality monitoring and sampling plan. • Measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).	
15.18.1.1	*Construction Traffic Management Plan* A Construction Traffic Management Plan (CTMP) is a key document that aims to reduce possible impacts which may occur during the construction period of a proposed development. An applicant/developer is responsible for ensuring construction activities are managed in accordance with the CTMP. Objectives and measures should be included for the management, design and construction of the proposed development to control the traffic impacts of construction	Please refer to Section 6 of the *Transport Assessment* submitted herewith for details of traffic management during the construction stage.

	insofar as it may affect the environment, local residents and the public in the vicinity of the construction works. Where demolition is taking place on site prior to the commencement of construction, a separate demolition construction traffic management plan is required. A Preliminary Construction Traffic Management Plan may be required during the Development Management process to ensure the feasibility of construction on constrained or restricted sites. Cumulative impacts with adjacent development sites should also be considered. A CTMP is subject to ongoing reviews of construction traffic management and liaison by the contractor/developer with Dublin City Council's Roadworks Control Section throughout the period of construction. Where multiple sites are within close proximity of each other and residential housing, developers may be required to coordinate and update their CTMP in consultation with DCC and with adjoining landowners; and also participate in a traffic and construction management group coordinated by DCC. The contractor/developer shall apply for all necessary licenses and permits where required.	
15.18.1.3	*Phasing* Dublin City Council may also require developers to submit a phasing and implementation programme for large developments including commercial development in excess of 5,000 sq. m. and residential schemes in excess of 100 units, to ensure a co-ordinated approach to the construction of the development.	Given the nature of the development, it will be developed in a singular phase.

	A phasing proposal should be included within the construction management plan submitted with applications for agreement with the planning authority.	
15.18.1.4	*Hours of Operation* On sites where noise generated by construction would seriously affect residential amenity, the site and building works must be carried out between 0700 and 1800 hours Monday to Friday only, and between 0800 and 1400 hours on Saturdays only. No works shall be carried out on Sundays or bank holidays. However, deviation from these times may be permitted in exceptional circumstances, where prior written approval has been received from Dublin City Council. Such approval may be given subject to conditions pertaining to the particular circumstances being set by Dublin City Council.	The hours of operation shall be adhered to, as detailed in Section 5.7 of the *Construction Environmental Management Plan* submitted herewith.
15.18.2	*Waste Management* All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both and Construction and Operational Waste Management Plan. The construction waste management plan may form part of the overall construction management plan and shall detail the strategy in relation to on site waste storage, segregation and disposal. Development proposals shall recycle demolition material and re-use existing building materials where possible. In all developments of 30 or more housing	A *Resource Waste Management Plan* and an *Operational Waste Management Plan* have been prepared and submitted herewith. Please refer to both documents for further details.

	units or commercial developments in excess of 1,000 sq. m, a materials source and management plan showing type of materials / proportion of re use/ recycled materials to be used shall be implemented by the developer. The operational waste management plan shall set out the strategy for waste collection, storage and recycling. All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area. See also Appendix 7 for further details.	
15.18.4	*Basements* It is the policy of Dublin City Council to generally discourage any significant underground or basement development or excavations below ground level of, or adjacent to, residential properties in Conservation Areas or to protected structures. Development of basements for residential use below the estimated flood levels for flood zone areas 'Zone A' or 'Zone B' will not be permitted (Policy SI20). It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is considered as being an accessible area positioned below the existing street level or ground level and would include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.	A *Basement Impact Assessment* has been prepared by Ayesa and is submitted herewith. Please refer to the document for further details.

	Detailed guidance is set out in Appendix 9 regarding the content and scope to be considered in the preparation of a Basement Impact Assessment.	
15.18.5	*Telecommunications and Digital Connectivity* All new developments will be required to provide for open access connectivity arrangements directly to individual premises to enable service provider competition and consumer choice in line with Policy SI46 of the development plan. The provision and siting of telecommunications antennae shall take account of the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, (Department of Environment and Local Government, 1996), as revised by DECLG Circular Letter PL 07/12, and any successor guidance. Telecommunications antennae and supporting structures should preferably be located on industrial estates or on lands zoned for industrial/employment uses. Possible locations in commercial areas, such as rooftop locations on tall buildings, may also be acceptable, subject to visual amenity considerations. In terms of the design of free-standing masts, masts and antennae should be designed for the specific location. In assessing proposals for telecommunication antennae and support structures, factors such as the object in the wider townscape and the position of the object with respect to the skyline will be closely examined. These factors will be carefully considered when assessing proposals in a	A *Telecommunications Report* has been prepared by Independent Site Management Limited and submitted herewith. The Report concludes the following: "*Design Compliance with the Planning Guidelines for 'Telecommunications Antennae and Support Structures' (1996), and Circular Letter PL 08/12 issued by the Department of the Environment and Local Government (as may be amended from time to time), and to other publications and material as may be relevant in the circumstances.* *The proposed telecommunications comply with the Guidelines and Circular on the basis that:* ✓ *They have been sited at rooftop level and painted to match external façade features to minimise their appearance and visual impact from street and other elevated levels and designed to minimise their scale;* ✓ *The antennae are encased in GRP shrouds (painted to match) to reduce the prospect of visual impact;* ✓ *Access to them can be provided via the residential block for management and maintenance;* ✓ *The sharing of existing facilities was considered but not deemed appropriate as their inclusion as part of the Development is to mitigate its distance from existing facilities and to mitigate the deteriorating impact on the*

	designated conservation area, open space amenity area, historic park, or in the vicinity of protected buildings, special views or prospects, monuments or sites of archaeological importance. The location of antennae or support structures within any of these areas or in proximity to protected structures, archaeological sites and other monuments should be avoided. Where existing support structures are not unduly obtrusive, the City Council will encourage co-location or sharing of digital connectivity infrastructure such as antennae on existing support structures, masts and tall buildings (see Policy SI48). Applicants must satisfy the City Council that they have made every reasonable effort to share with other operators.	*existing telecommunication infrastructure located to the north, south and west of the proposed residential blocks;* ✓ *Their size, height and location do not impose a health and safety risk, with the support structures considered to be sufficiently robust; and* ✓ *The design fully considers and caters for the sharing and co-location of these facilities with Ireland's 3no. Mobile Network Operators*."
15.18.6	*Plant Machinery* Where required, the scale of plant at roof level should be minimised and have a suitable finish or screening so that it is discreet and unobtrusive. Plant, flues and lift overruns should not be included in the height of the building, as long as they are set back and properly screened and do not significantly add to the shadowing or otherwise of natural light beyond that of the main structure. Where plant rooms are highly visible, and occupy the majority of roof space, the impact of such will be assessed similar to an additional floor.	The provision of plant in the development is predominately at basement and ground level. At eighth floor level, to the west of the stairs and lift for Core A, there is a 34 sq m plant room proposed for the heat pumps. Directly south of this, and to the west of the 50 sq m internal amenity space, is an open generator which has been minimised as much as possible by enclosing it by sufficient screening either by the building itself to the north and east or a 3-metre high mesh screening to the west and south. Furthermore, the lift overruns will not dominate the roofscape.
15.18.8	*Solar Energy* Solar or PV panels allow solar energy to be utilised in the ongoing operation of a building. In line with NZEB requirements, Dublin City Council will require all new	The proposed development includes PV Panels to convert solar radiation into electricity.

	developments to provide for solar panelling / PV panels to contribute to the energy generation in a building where feasible. For individual dwelling units, homeowners can utilise solar thermal panels that produce hot water and photovoltaic panels that produce electricity. Solar systems can be installed in the roof space of a dwelling similar to roof lights. Any solar thermal panels that are installed on or in roofs should not unduly dominate the roof and should be sensitive to the character, colour and style of the existing roof. The Planning and Development Regulations 2007 (S.1 No. 83 of 2007) set out planning exemptions for micro-renewable energy technologies for domestic houses including solar panels, heating systems and wind turbines. Please refer to the Sustainable Energy Authority of Ireland Best Practice Guide to Photovoltaics (PV) for full details on the design and requirements for PV. https://www.seai.ie/publications/Best_Practice_Guide_for_PV.pdf Large scale proposals for solar panels or any development in the vicinity of the airport will be required to submit a Glint and Glare Assessment. Domestic applications will be assessed on a case by case basis. All large scale proposals involving for solar panels shall be sent to Irish Aviation Authority and Dublin Airport Authority as part of the statutory consultee process.	A *Glint & Glare Assessment Report* prepared by Lawler Sustainability is enclosed separately with this planning application which concludes the following: *"A glint and glare analysis was completed for the proposed Solar PV installation at the proposed Independent House PBSA, Abbey Street, Dublin. The development is located within several Solar Safeguarding Zones as identified by The Planning and Development (Solar Safeguarding Zone) Regulations 2022. The report has assessed the required nearby airports, aerodromes, and helipad receptors.* ***No glare was found within the study*** *provided that the parapet wall feature is constructed as demonstrated in the Architectural drawings with an edge height of at least 400mm and that the PV panels are positioned at roof level with a tilt degree between 0° and 45°.* ***The parapet wall acts as a shield which obstructs the effect of glare emanating from the PV panels and is an important factor in this assessment****. It is recommended that the proposed PV be fixed in place at roof level orientated towards the South direction, have no sun tracking, and have low-texture glass with anti-reflective coating."* **[Our Emphasis]** [Author's Emphasis]

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. Development proposals for residential development within designated noise zones, such as Dublin Airport Aircraft Noise Zones or which may generate noise sensitive activities should be accompanied by a noise impact assessment to analyse the potential noise impact on the development proposal. The applicant is required to demonstrate good acoustic design has been followed to mitigate against any potential noise impacts. Airport Noise Zone C is partially located within the Dublin City Council administrative boundary. For further details and map based information, see Fingal County Development Plan 2017-2023 Variation 1. https://www.fingal.ie/fingal-development-plan-2017-2023. Construction noise assessment should form part of the construction management plan and set out clear mitigation measures in place throughout the entire construction phase. Operational noise should be assessed as part of the planning application to determine whether the proposed use of the development will impact on the ambient noise levels of the surrounding environment. Appropriate sound proofing and	An *Acoustic Design Statement* has been prepared by Wave Dynamics. The report outlines the inward noise impact on the development and carries out a vibration impact assessment and an operational and construction noise impact assessment. The following provides the conclusions reached by Wave Dynamics under each assessment for noise and vibration: **Inward Noise Impact** "*A review of the noise levels on the site was conducted, this included the LAFmax and LAeq, the site has subsequently been characterised as high risk along the Middle Abbey Street elevation for night time noise, and medium risk across the remainder of the site therefore, mitigation measures are required to control the onset noise levels.* *Break-in noise calculations to predict the internal noise levels from road and Luas traffic noise were conducted as part of the assessment. Consideration has also been given to the future growth of the roads and Luas network*. ***Following the assessment, the building envelope performance requirements were determined to achieve adequate internal noise levels***." **[Our Emphasis]** "*The external amenity spaces on the development include three roof terraces on fifth, sixth and eighth floor levels. Appropriate amenity has been provided on the development for occupants using a combination of these amenity spaces. This is in line with element 3(v) of ProPG*." "***Based on the recommendations in this report it is predicted that the internal and external noise levels will***

	noise mitigation measure should be provided where necessary.	***achieve the targeted noise levels in line with BS 82233:2014 and ProPG 2017 guidance***." **[Author's Emphasis]** **Vibration Impact Assessment** "*A vibration survey was undertaken on the site to measure the vibration levels from Luas pass-bys in terms of VDV (Vibration Dose Value). The purpose of the survey was to measure the existing vibration levels and predict its impact on the amenity of the future occupants.* *The vibration impact on the resident's amenity has been assessed based on a worst-case scenario. Based on the measurements taken onsite* ***it is not predicted that the vibration impact from Luas pass-bys will have any negative impact on the amenity of the occupants of the proposed development.*** *The measurements found a very low level of vibration from Luas pass-bys*." **[Our Emphasis]** **Construction Noise Impact** "*General and site-specific mitigation measures have been provided in this report to bring the construction noise levels down within the limits of BS 5228. Following* ***the noise mitigation recommendations in this report, the construction phase is expected to meet the requirements*** *of BS 5228 based on the information provided to WDA*." **[Author's Emphasis]** **Operational Noise Impact** "*An operational noise impact assessment has been undertaken considering the noise generated in the communal*

		amenity space, and the plant and equipment on the rooftop. ***It is predicted that the development will not cause a negative noise impact on the nearby noise sensitive locations***." **[Author's Emphasis]** The *Construction Environmental Management Plan* by AWN Consulting also sets out additional measures in relation to noise and vibration during construction.
15.18.10	*Air Quality* All developments during construction and operational stage shall ensure that the air quality of the surrounding area is not effected (see also Section 9.5.7). Details of the air quality controls in place throughout construction shall be identified in the construction management plan. As part of the operational management of a proposal, applicants are required to facilitate air extraction / ventilation units and other associated plant and services through the use of internal ducting. Details of such proposals shall be set out in planning applications as part of Mechanical and Electrical Engineering details.	Please refer to the ventilation drawings prepared by OCSC submitted herewith which outlines the operational ventilation strategy. Additionally, Section 7 of the *Climate Action, Energy & Sustainability Report* outlines how the proposed development will achieve compliance with Part F (Ventilation) of the Building Regulations - Technical Guidance Documents. The Report outlines that the following requirements of Part F shall be complied with: **Means of Ventilation** • F1 – Adequate and effective means of ventilation shall be provided for people in buildings. This shall be achieved by: (a) Limiting the moisture content of the air within the building so that it does not contribute to condensation and mould growth; and (b) Limiting the concentration of harmful pollutants in the air within the building. **Condensation in Roofs**

		• F2 – Adequate provision shall be made to prevent excessive condensation in the floor or in a roof void above an insulated ceiling. The proposed ventilation strategy for the areas will be natural ventilation where possible and/or mechanical ventilation. The mechanical ventilation system will be a high efficiency, variable speed drive system that also incorporates heat recovery and CO_2 control.
15.18.11	*Ground Investigation* Any development containing significant excavation including the construction of a basement or any development on brownfield lands should include a ground investigation report to be submitted with an application. This will determine the best practice design based on the soil composition. Where lands are considered unstable or infilled, a strategy for the support and or removal of underground lands shall be provided as part of a planning application.	A *Waste Classification Report* has been prepared by Ground Investigations Ireland and is submitted herewith.
	Ground Contamination Any contaminated land will require appropriate remediation prior to redevelopment, including, in some instances, removal of material from a site which may require a licence under the Waste Management Act, 1996, as amended, prior to the undertaking of such works (see Section 9.5.6). In all cases involving contaminated land, it is the policy of Dublin City Council to require the highest standards of remediation and where appropriate to consult with the Environmental Protection Agency and other relevant bodies to resolve the environmental pollution created by contaminated land.	A *Waste Classification Report* has been prepared by Ground Investigations Ireland and is submitted herewith. It was found that the material sampled across the site, if being considered as waste, can be classified as non-hazardous. All material to be removed from the site will be taken to an appropriate facility for treatment or disposal in accordance with the EPA requirements.

	Where the previous history of a site suggests that contamination may have occurred, developers will be responsible for the following: • Undertaking a detailed site investigation, soil testing and analysis to establish whether contamination has occurred. • Providing a detailed written report of investigation and assessment (including recommendations for treating the affected ground) to Dublin City Council. • The decontamination of sites prior to new development works taking place, and the prohibition of development until Dublin City Council is satisfied that the affected ground has been satisfactorily treated. • Decontamination activities should ensure that there is no off-site migration of contaminants via run-off, soils or groundwater.	
	Flood Risk Management All applications for developments in flood risk areas shall have regard to the Strategic Flood Risk Assessment of this plan. All applications within flood zones A and B will be required to submit a Site-Specific Flood Risk Assessment to an appropriate level of detail (see Policy SI15 and SI16). Potential applicants should ensure consideration of residual risk without regard to any existing flood protection structures. Dublin City Council will assess planning applications with regard to the vulnerability classes of land-use and development types in accordance with the national	The *Flood Risk Assessment* prepared by Waterman Moylan Consulting Engineers, which is submitted herewith, concludes the following: "*The subject lands have been analysed for risks from flooding from the Irish Sea, fluvial flooding, pluvial flooding, ground water and failures of mechanical systems. Through careful design and appropriate mitigation measures* ***the risks and consequences of flooding have been mitigated across the development.***

	guidelines. Potential applicants should refer to these and demonstrate adherence to them. In relation to rivers, potential applicants should give consideration to potential river channel impacts, adhere to the Inland Fisheries Ireland guidance and ensure access for wildlife to the river where possible.	*Surface water runoff from the site is limited to Greenfield runoff and does not impact on developments upstream or downstream of the subject site*." **[Our Emphasis]**
Appendix 3 – Achieving Sustainable Compact Growth Policy for Density and Building Height in the City		
3.1	*Height* The main determining factor in considering appropriate heights is the need to create exemplar urban development with attractive streets, spaces and public areas that integrate successfully with the surrounding area. The key factors that will determine height will be the impact on adjacent residential amenities, the proportions of the building in relation to the street, the creation of appropriate enclosure and surveillance, the provision of active ground floor uses and a legible, permeable and sustainable layout. At a European level, best practice examples indicate that appropriate density and layouts that create appropriate street scale and enclosure are achieved with mid-rise typologies of buildings 4 to 8 storeys in height. Scope for taller or landmark feature buildings is generally limited to marking key areas of note. At a strategic level, Dublin City has an intrinsic quality as a predominantly low rise city. There is a recognised need to protect conservation areas and the architectural character of existing buildings, streets and spaces of artistic, civic or historic importance. In particular, development proposals must be sensitive to the historic city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval	Please see Section 8.2.4.2 of this Report which assesses the subject scheme in the context of certain 'performance criteria' relating to building height that is set out in Table 3 of Appendix 3 of the *Development Plan.*

	quarter, the historic squares and the canals. It is important to protect the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city and create opportunities for place making and identity. Opportunities for height will be promoted on sites identified in section 4 below and in accordance with the performance criteria set out in Tables 3 and 4.	
3.2	*Density* Sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity. Public transport accessibility and capacity will also determine the appropriate density permissible. A varied typology of units will be encouraged to ensure a diverse choice of housing options in terms of tenure, unit size and design in order to ensure demographic balance in residential communities. All proposals for higher densities must demonstrate how the proposal contributes to healthy place making, liveability and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods As a general rule, the following density ranges will be supported in the city.	As the subject site is located within the City Centre and Canal Belt, a density range of 100 – 250 units per hectare (uph) applies to the proposed development, as a general rule. As the *Development Plan* does not set out how the density for Student Accommodation should be calculated to align with Table 1, we have used the calculation provided in the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024).* As discussed in detail in Section 6.8 in this Report, the density for the proposed development equates to 289 No. units per hectare (uph). Whilst this is above the general density range for the subject site, we note Section 15.13.1 of the *Development Plan* states that, in general, Student Accommodation provision "*can take place at relatively high densities*". Section 3.2 of Appendix 3 further states that the Council's strategic approach to density is that "*the highest densities should be located at the most accessible and sustainable locations*", which is further recognised in Section 4.1 of Appendix 3 as it states that sites located in proximity to 'Public Transport Corridors' are recognised as areas that can provide higher densities. Section 4.1 continues to set out that such higher density developments will be promoted within 500-metres walking distance of a bus stop or within 1-

Table 1: Density Ranges

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

kilometre of a light rail stop or rail station and the highest densities will be promoted at key public transport interchanges or nodes.

As discussed in Section 2.3 of this Report, the subject site benefits from its proximity to a multitude of public transport options that are considered by the *Development Plan* as 'Public Transport Corridos'. The Luas Red Line runs along Middle Abbey Street and the subject site itself, with nearby stops located at Jervis (c. 300-metres/4-minute walk) and Abbey Street Lower (c. 200-metres/4-minute walk). The Luas Green Line services are located a short distance away with northbound trams stopping on O'Connell Street (c. 100-metres/2-minute walk) and southbound trams stopping on Marlborough Street (c. 300-metres/4-minute walk). There are numerous bus stops in close proximity to the site along O'Connell Street and Lower Abbey Street, providing c. 31 No. Dublin Bus routes. This is in addition to the interurban bus services operating at Busaras, located c. 700-metres/10-12-minute walk from the site, as well as Aircoach, City Link and Wexford Bus services. Tara Street Station is the closest DART station and is situated c. 500- metres/10-minute walk from the subject site. Connolly Station is also located only c. 900-metres/13-minute walk from the site.

The plethora of high-quality public transport options, which offer frequent and various route services, allows the subject site to provide a high density development.

In addition to the accessible nature of the subject site, the proposal seeks to provide a high-density development whilst respecting the site's city centre context and the existing historic and sensitive character of the surrounding area. This is demonstrated in the various assessments that have been carried out to determine the impact of development. A summary of the positive conclusions and assessments are as follows:

		• The *TVIA* concludes the development would be "*overwhelmingly positive*"; • The *Daylight and Sunlight Assessment Report* concludes that "*the proposed development strikes a favourable balance, performing well in both overall scheme quality and its impact on neighbouring properties*"; • The *Acoustic Design Statement* concludes that "*the development will not cause a negative noise impact on the nearby noise sensitive locations*"; and • The *Architectural Heritage Impact Assessment* concludes that the development "*is considered a viable strategy to reoccupy the site while simultaneously safeguarding the external character of the early 20th century grouping from its primary ACA viewpoints*". Please refer to the response to Section 15.4.1 'Healthy Placemaking' for details of the principles of healthy placemaking have been embedded into the design of the proposed development. The subject scheme will contribute to a sustainable neighbourhood as it caters to a specific population cohort-students, a cohort not currently catered for. The proposed mixed-use nature of the scheme, including the provision of cultural/community space will also contribute to a sustainable neighbourhood. Having regard to the above, it is considered that 289 uph is an acceptable density for the subject site.

	Plot Ratio and Site Coverage All applications should be accompanied by a calculation of density: units per ha and bed spaces per ha, plot ratio and site coverage. Table 2 below sets out indicative plot ratio and site coverage standards for different areas of the city. **Table 2: Indicative Plot Ratio and Site Coverage** | Area	Indicative Plot Ratio	Indicative Site Coverage | |---|---|---| | Central Area | 2.5-3.0 | 60-90% | | Regeneration Area | 1.5-3.0 | 50-60% | | Conservation Area | 1.5-2.0 | 45-50% | | Outer Employment and Residential Area | 1.0-2.5 | 45-60% | Higher plot ratio and site coverage may be permitted in certain circumstances such as: • Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed. • To facilitate comprehensive re-development in areas in need of urban renewal. • To maintain existing streetscape profiles. • Where a site already has the benefit of a higher plot ratio. • To facilitate the strategic role of significant institution/employers such as hospitals. Any development with a plot ratio over 3.0 must be accompanied by a compelling case.	Please refer to Section 8.2.4.1 of this Report.

4.1	*The Compact City – How to Achieve Sustainable Height and Density* All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3. The general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, Key Urban Villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development. In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled areas of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height. As a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below. Greater heights may be considered in certain circumstances depending on the site's location and context and subject to assessment against the performance based criteria set out in Table 3. Key criteria which all proposals for increased urban scale and height must demonstrate include:	Performance criteria as per Table 3 have been fully complied with in the proposed development. Please see Section 8.2.4.2 of this Report.

	• The potential contribution to the development of new homes, economic growth and regeneration in line with the compact urban growth principles set out in the NPF and Project Ireland 2040. • Proximity to high quality public transport connectivity, including key public transport interchanges or nodes. • Proximity to a range of employment, services and facilities. • Provision of adequate social and community infrastructure. • The availability of good walking, cycling and public transport infrastructure. • Appropriate mix of uses, housing typologies and tenures. • The provision of high quality public open space and public amenities. • The resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents. • That the ecological and environmental sensitivities of the receiving environments have been adequately assessed and addressed. • Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character. • Adequate infrastructural capacity.	
Appendix 5 - Transport and Mobility: Technical Requirements		
2.1	The layout for all developments shall seek to maximise pedestrian permeability within the development and to improve pedestrian and cycle linkages to the wider road network, as far as possible. A walkability and/or cyclability	The proposed improvements to William's Lane will create a permeable and legible public realm and will experience a significant increase in movement between Middle Abbey Street and Prince's

	audit may be required depending on the location of the development and existing provisions within the local road network. All developments, from one-off housing to large scale mixed use development, shall demonstrate safe vehicular access and egress arrangements. All vehicular access shall be considered, including private car, service, delivery and vehicles, and emergency vehicles, in addition to applicable vehicular access requirements. Where possible, service areas shall be provided within the curtilage of the site to minimise the impact on the local road network. All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS. All planning applications for retail / commercial developments are to include the following: • A place to park adjacent to the building or complex for passengers with disabilities / mobility issues as well as for drivers with disabilities / mobility issues. • Dished or level crossings at all traffic junctions and the use of tactile paving and audible signals, where appropriate. • Parking bays which are sufficiently wide to allow access for wheelchairs. • A route from a parking place to the building that is level or ramped and unimpeded by steps. • A visible, accessible entrance-way and door to the building – not a separate 'disabled' entrance – which is easy to distinguish and must be under cover (revolving doors and frame-less glass doors are considered to be hazardous).	Street and further onto O'Connell Street to the east and Henry Street via the GPO Arcade to the north of the site. In order to protect and enhance the pedestrian network a Quality Audit including a pedestrian audit was carried out to make sure all key point for the network were considered in the design. A new crossing is proposed in Prince's Street to allow pedestrian to cross safely considering that the road is frequently being used by delivery vehicles for the nearby commercial business. Please refer to the engineering Drawing pack, *Transport Assessment, Travel Plan, Delivery and Service Management Plan* and the *Quality Audit Inclusive of Stage 1 Road Safety Audit* for full details on how the proposed development accords with the requirements set out in Section 2.1 of Appendix 5.

	• Sign-posting for the buildings which is legible and well-illuminated, with lettering and numerals on doors at eye level. • Pedestrian routes in open spaces or between buildings which are free from obstructions, pathways which are wide enough for people who use wheelchairs i.e. 2000mm /Irish Wheelchair Association Best Practice Guidelines, and surfaces which are slip resistant. • In the case of changes in level, shallow ramps in addition to steps and stairways which are clearly marked and equipped with handrails. • The careful sitting of bollards, gully gratings and signposts to avoid hazards. • Public toilets for people with disabilities which are sited so that they are accessible and usable. Large scale developments are required to install 'Changing Places' toilets. • Floor surfaces inside the building which are slip-resistant, and where there are changes in level, ramps as well as steps or stairways which are clearly marked. • Where a building is multi-storey, a lift large enough for a wheelchair and a minimum of one other person with controls that are usable from a seated position to serve all main circulation areas which provide facilities. • Clear sign-posting and usability of amenities e.g. lavatories and telephone. • The improvement of access to existing buildings and their surroundings as opportunities arise, through alterations, extensions and changes of use. • An explanation of how surrounding roads, footpaths and sight-lines will be linked.	

	• Illustrations of access to and access within the building itself. • Diagrams showing how people can move to and through the place –including vehicles, bikes and pedestrians. • Description of how levels change within the public spaces, including pavement and dropped kerbs. • Specifications to show that disabled people will not be segregated but will be able to move around within a building at all levels and use the same entrances, corridors and rooms as everyone else without a detour. • Details of how access for the emergency services will be provided. • Where appropriate with a building, sign-posting, illustrations and diagrams to inform the public in accessible formats for people with impaired vision. • Landscape design which takes into account the needs of people with disabilities i.e. pathways should not be encroached upon and the future possibility of low overhanging branches should be avoided. All specimen trees should be selected with consideration for people with disabilities e.g. root damage to surfaces and over-hanging branches etc.	
2.2	*Transport Assessments* Traffic and Transport Assessments (TTA) and Road Safety Audits will be required for major developments, in accordance with the National Roads Authority (NRA) (now Transport Infrastructure Ireland (TII) Traffic and Transport Assessment Guidelines (2014) and any subsequent review, to	A *Transport Assessment* and *Quality Audit* has been prepared as part of the application and are submitted herewith.

	assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts. Applications which comprise of, but not limited to, the construction of new roads, amendments to existing roads, any project which materially affects vulnerable road users, or any development that generates significant road movements, shall be accompanied by a Road Safety Audit and Quality Audit to assess the existing road network and set out the appropriate traffic management strategy for the new development.	
2.3	*Mobility Management and Travel Planning* Where a zero or reduced quantum of car parking is proposed for a residential development, a proactive mobility management strategy is essential at the early design stages to identify measures that will promote the use of sustainable modes within the development and ensure any associated infrastructure can be incorporated into the design. A Residential Travel Plan will be required to support the zero/reduced provision of car parking to serve a development.	Please refer to the *Travel Plan* and *Transport Assessment* prepared by Waterman Moylan Consulting Engineers and submitted herewith.
2.4	*Service Delivery and Access Strategy* As outlined in Chapter 8 Sustainable Movement and Transport, the city centre and urban villages have limited capacity on the streets to accommodate the wide range of activities generated by existing and new developments. Having regard to this limited capacity, service areas shall be provided where possible within the curtilage of the site. These areas are to be used exclusively for service and delivery	Please refer to the *Delivery and Service Management Plan* and the *Student Management Plan* submitted herewith for details.

	vehicles, details of which will be determined by the planning authority. The servicing requirements for any development should be established early in the preplanning process. Swept-path analysis shall also be submitted demonstrating the safe manoeuvrability of all vehicles servicing the site. Where no off-street services or on-street storage can be provided, it shall be a requirement of all new developments to submit full details of all new deliveries, including their time, frequency and manner, to the planning authority. For student accommodation and co-living/shared accommodation, details on how arrivals/departures will be managed shall also be submitted as part of a planning application, as well as detailing how the overall servicing and delivery needs for the multiple residents will be managed for the development. Where a development is located in close proximity to a Luas line, consideration to the impact of deliveries and services during the operation of the development on the Luas line shall be determined and associated mitigation measures outlined.	
2.5	*Car Parking and Cycle Management* Car parking ratios for new developments are dependent on a number of factors in order to deliver a sustainable community. In particular locations, active travel (walking and cycling) infrastructure and provisions to support active travel modes and access to operational high frequency public transport corridors within 10 minutes walking distances are all key components for reduced car parking provision. Other	Please refer to *Bicycle Parking Management Plan* submitted herewith for details. As no car parking is proposed for the development, a 'Car Parking Management Plan' has not been prepared.

	applicable factors include access to services and amenities located within walking distance, high quality shared mobility provision, and service vehicles access and strategy which all seek to minimise the impact on the public transport corridors and other users of the surrounding road network. Access for emergency vehicles, refuse collections and general servicing needs (i.e. domestic/household deliveries) shall be adequately demonstrated. Identifying the location of drop off/pick up areas for deliveries, in particular for car free developments which may be reliant on third party services to meet their household requirements, shall also be considered early in the design process. Where a number of covered and secure bicycle stores are to be provided, consideration shall be given on how access to these stores will be managed for users through the submission of a Bicycle Parking Management Plan. Bicycle stores shall be fully accessible to users of varying ability i.e. the use of ramps/lift access shall be facilitated where possible. The reliance on wheel ramps located on stair cases to access bicycle parking, especially for large residential and commercial developments with zero or reduced car parking provision is not conducive to fully accessible bicycle parking and is discouraged by Dublin City Council. Where large bicycle stores are proposed i.e. in excess of 100 spaces in a single store, consideration shall be given at an early design stage to providing additional measures within these stores where further segregation of bicycle storage could occur e.g. provision of bicycle cages that would hold a smaller number of bicycles and could be effectively numbered/labelled for ease of use. The management of	

	bicycle parking should also detail how access to stores for cargo bikes and adapted bikes will be facilitated.	
8.2	*Road and Footpath Standards* All roads and footpaths within developments shall be constructed to Taking-in-Charge standards. Dublin City Council sets out construction technical standards and specifications in Construction Standards for Road and Street Works in Dublin City Council (2020) and any subsequent review. Any works proposed to alter or amend existing public footpaths / roadways must be agreed with the planning authority at an early stage in the pre-application process. A letter of consent may be required from the Environment and Transportation Department for these works and submitted with the planning application which details the proposed amendments to the public footpath or roadway.	The Design Team has confirmed that all works will be in line with Dublin City Council's standards for Taking in Charge. Please refer to Drawing No. 'P 0021' prepared by Henry J Lyons for an outline of what areas are to be taken in charge and Drawing No. 'C0175-GA-00-1002' & 'C0175-DR-00-900' prepared by Cameo & Partners for details of the materials proposed along the areas to be taken in charge. A Letter of Consent has been attained from Dublin City Council and submitted herewith which gives consent to the proposed road and infrastructure works within their jurisdiction to take place.
8.3	*Taking in Charge* All areas to be taken in charge by Dublin City Council shall be maintained free of development both above and below ground. No part of a development shall overhang and no basements should extend under footpaths, roads and areas of public realm if these areas are intended to be taken in charge by the Road Maintenance Services Section of Dublin City Council. Where an existing overhang is already permitted, the development will be assessed on its merits on a case by case basis.	Please refer to Drawing No. 'P 0021' prepared by Henry J Lyons for an outline of what areas are to be taken in charge. The Protected Structures on Middle Abbey Street include existing elements (e.g. decorative cornicing and ornate brass clock) that overhang the public footpath in front of the site. There are also numerous areas within the existing basement level that extend beyond the main building footprint under the public footpath along Middle Abbey Street and Prince's Street North. These public footpaths, to which parts of the building extend under/overhang, are maintained by Dublin City Council. Although the basement areas and upper floor elements extend under/overhang the public footpaths maintained by Dublin City Council, they have been as

	Planning applications comprising of areas to be taken in charge shall be accompanied by a taken in charge site layout plan at a scale of 1:500 which indicates the area of the site sought to be taken in charge. The details and specification of the road and footpath layout of these areas should be set out as part of the planning application.	such for a vast number of years. No changes are proposed to the parts of the building that overhand the footpath, whilst part of the southern basement under the footpath on both Prince's Street North and Middle Abbey Street will be blocked off from development. As stated in the *Archaeological Assessment*, some areas of the basement were inaccessible during the time of the site survey and inspection due to health and safety concerns. A detailed inspection of the basement areas will be carried out as part of a predevelopment enabling works, subject to health and safety procedures and regulations.
Appendix 9 - Basement Development Guidelines		
3.0	The purpose of the Basement Impact Assessment is to identify potential impacts, short and long term; to inform whether a proposed basement is acceptable; and to identify whether appropriate mitigating measures can be incorporated. It must also demonstrate: • That the construction of the basement will not unduly impact on groundwater conditions and that groundwater quality, quantity and classification will be protected. • That groundwater or surface water flows will not be impacted on to the extent that there is likely to be an increase in the risk of flooding. • That the basement development will not increase groundwater infiltration into existing sewers and drains beyond permitted levels. • That the basement development will not have an adverse effect on existing patterns of surface water	Please Refer to the *Basement Impact Assessment* submitted under a separate cover.

	drainage, including infiltration into groundwater and is consistent with best practice in SuDS. • That the structural stability/integrity of adjoining and neighbouring buildings will not be compromised. • That the design of the basement relates to the characteristics/proportions of the site. Domestic basements, save for exceptional circumstances, should not exceed the footprint of the original building and be no deeper than one storey below ground level. They should generally not extend to more than 50% of the amenity/garden area. • That the basement has been designed to an appropriate standard and will be constructed in accordance with a detailed Construction Management Plan during the excavation and construction stages and that an appropriate suite of mitigation measures are proposed to address potential adverse impacts. • That the construction of the basement will not cause undue nuisance to the residential amenities of existing communities and will not adversely impact on the built and natural environment. • That the design of the basement considered impacts on future planting including trees and where possible, enhances the biodiversity value of the site. • That the basement development will not adversely impact on existing protected structures, heritage sites, conservation areas or sites of archaeological interest. The City Council in general does not support the construction of basements in close proximity to protected structures. However, in instances where this is proposed, the applicant must demonstrate that the basement construction will have no adverse	

	impact on the structural stability of this structure, including at excavation/construction stage e.g. vibration, settlement. • That the design of the basement provides for adequate ventilation; a suitable means of escape to a place of safety at the external ground level and that depending on the intended use of the basement accommodation, adequate sunlight/daylight penetration is provided. The design should be compliant with all relevant building regulations.	
4.1	*Baseline Characteristics of the Project* This will include details such as: • Development extent and description. The BIA should provide details of the retaining wall and basement design for the basement excavation. Details should be provided regarding all temporary and permanent works including where piles and ground anchors or similar are proposed to be used. • A plan showing the site location and boundary of the development including land required temporarily during construction. • Maps and photographs showing the location of the project relative to surrounding buildings and structures, topography, protected structures and man-made features. • An assessment and description of the ground conditions, surface water and groundwater regime including groundwater levels and history of any previously built infrastructure on the site of the	Please Refer to the *Basement Impact Assessment* submitted under separate cover.

<table>
<tr><td></td><td>proposed excavation including the potential for contamination.
• Schematic and details of the water table level and groundwater flow direction (conceptual site model during construction phase and in the longer, post-construction phase).
• A work programme for construction, operation and commissioning phases and restoration and after use where appropriate.
• Construction methods including any temporary/permanent works.
• Details of any other permits required.</td><td></td></tr>
<tr><td colspan="3">Appendix 11 - Technical Summary of Dublin City Council Green & Blue Roof Guide (2021)</td></tr>
<tr><td>2.2</td><td>Green Blue Roof Requirement 2 – Areal Coverage

Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application.

The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.

Table 1: Green Blue Roof Minimum Coverage
<table><tr><th>Type of green roof</th><th>Minimum coverage (% of total roof area being developed)</th></tr><tr><td>Extensive</td><td>70%</td></tr><tr><td>Intensive</td><td>50%</td></tr></table>
The percentage coverage is considered to make a reasonable allowance for the provision of overruns, roof lights, fire breaks, service penetrations and hard landscape.</td><td>The proposed green and blue roofs are proposed in line with DCC's Green & Blue Roof Guide (2021) as demonstrated in the Storm Water Management Plan. Waterman Moylan Consulting Engineers also confirm that the proposed green and blue roofs meet the minimum 70% requirement for extensive roofs.</td></tr>
</table>

2.3	*Green Blue Roof Requirement 3 – Hydraulic Operation* The design of green blue roofs will make provision for suitably sized emergency / exceedance overflow(s).	Please refer to the *Storm Water Management Plan* submitted herewith. Green and blue roofs are proposed in line with DCC's *Green & Blue Roof Guide (2021).*
2.4	*Green Blue Roof Requirement 4 – Use* The design of the green blue roof should maximise biodiversity and / or amenity benefits. Green blue roof designs should be designed to ensure that any amenity use (e.g. use as communal open space) can be facilitated without effecting storage capacity or drainage function of the green blue roof.	The design of the green roof will maximise biodiversity and amenity benefits. The amenity use will not affect the storage capacity or function of the blue roofs.
2.5	*Green Blue Roof Requirement 5 – Access, Operation and Maintenance* All green blue roofs shall be designed with consideration of their future maintenance requirements. Sedums, succulents and soils with low organic content are considered to be naturally fire-retardant and do not present a unique risk to propagating flame spread relative to a conventional flat or gently sloped roof. All green blue roofs shall be designed in consideration of current fire safety requirements.	Please refer to the *Storm Water Management Plan* submitted herewith. Green and blue roofs are proposed in line with DCC's *Green & Blue Roof Guide (2021).* Roof access will be provided as per Henry J Lyons drawings.
Appendix 12 - Technical Summary of Dublin City Council Sustainable Drainage Design & Evaluation Guide (2021)		
3.1	*SuDS Requirement 1 – Runoff Destination* The following methods of utilising or releasing rainfall run-off from development are set out in order of preference:	Please refer to the *Storm Water Management Plan* and *Engineering Assessment Report* submitted herewith.

	i) Use surface water run-off as a resource. ii) Provide interception of rainfall through the use of nature based SuDS approaches. iii) Where appropriate, infiltrate run-off into the ground. iv) Discharge to an open surface water drainage system. v) Discharge to a piped surface water drainage system vi) Discharge to a combined sewer. Discharging run-off from a site may utilise one or more means of discharge. Full advantage should be taken of each method of discharge on the list in turn, prior to considering the next sequential option.	Rainwater harvesting is proposed. Interception via SuDS as green and blue roofs is proposed. The excess water will ultimately discharge in a controlled flow to the existing combined sewer.
3.2	*SuDS Requirement 2 – Hydraulic Control* Surface run-off from new development will be restricted to 2l/s/ha for the 1 in 100 year rainfall event (with allowance for climate change and urban creep) where surface water leaving the site: • Poses a pollution risk to the environment arising from (overflow from a combined sewer to a receiving watercourse); • Has the potential to impact upon property or infrastructure (where property or infrastructure is identified as being at flood risk from a 1 in 100 year flood / rainfall event).	Please refer to the *Storm Water Management Plan* and *Engineering Assessment Report* submitted herewith. Restricted flow to 2 l/s/ha will be implemented to the development.

3.3	*SuDS Requirement 3 – Water Quality* SuDS designs will demonstrate sufficient number of SuDS techniques which are sufficiently sized to manage and remove pollution, to provide protection of groundwater, surface waters and sensitive coastal waters. The SuDS design will demonstrate that water is suitably cleansed prior to entry to SuDS components that are intended for amenity use and biodiversity benefit. Preference should be given to SuDS techniques which generate interception losses.	Please refer to the *Storm Water Management Plan* and *Engineering Assessment Report* submitted herewith. Rainwater harvesting is proposed. Interception via SuDS as green and blue roofs is proposed. The excess water will ultimately discharge in a controlled flow to the existing combined sewer.
3.4	*SuDS Requirement 4 – Amenity* Designs should seek to generate amenity benefits using SuDS, through the creation of multi-functional places and landscapes.	Please refer to the *Storm Water Management Plan* submitted herewith. SuDS elements were used as much as possible into the design.
3.5	*SuDS Requirements 5 – Biodiversity* Designs should seek to generate biodiversity benefits using SuDS.	Please refer to the *Storm Water Management Plan* submitted herewith. SuDS elements were used as much as possible into the design.

9.0 CONCLUSION

The subject site has been vacant for many years, following the closure of Independent Newspaper in 2002, which has led to the significant damage and deterioration to the historic fabric of the structures on site, including the damage to the Protected Structures. Without intervention, the structures will continue to deteriorate and further damage to original fabric is inevitable. The proposed development seeks to restore and enhance the Protected Structures whilst being able to provide much needed PBSA bedspaces in Dublin City Centre.

As demonstrated throughout this Report and the accompanying documents, the proposed development will ultimately provide attractive and legible streets, spaces and public areas, active uses at ground floor level, and appropriate surveillance, whilst ensuring the protection of the amenity of neighbouring properties. The proposed development would have an "*overwhelmingly positive*" and "*major positive*" impact on the Protected Structures and historic character of the receiving environment, as demonstrated in the *Townscape and Visual Impact Assessment* and *Architectural Heritage Impact Assessment.*

Having regard to both the urgent demand for PBSA bedspaces in Dublin City and the need to regenerate this highly accessible and central site, it is considered that the subject development is an appropriate use for the site and is an appropriate scale, height and form.

Please do not hesitate to contact the undersigned should you require any further information or clarification on the proposal.

Yours faithfully,

Patricia Thornton

Patricia Thornton
Director
Thornton O'Connor Town Planning