

Planning Report

For a Large-Scale Residential Development (Purpose-Built Student Accommodation Scheme)

**Lands at the former “Matt’s of Cabra”
Public House, 2A Fassagh Avenue,
Dublin 7
D07 TH77**

On behalf of

**R & D Developments Limited
(in Receivership)**



January 2026



**Brock
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1 Executive Summary

A brief summary of the key points of this report is set out below:

- **Agent and Applicant Details** – We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin have been instructed by our client R & D Developments Limited (in receivership) Grant Thornton, 13-18 City Quay, Dublin 2, D02 ED70 to prepare and submit this Planning Report to accompany a planning application to Dublin City Council regarding the re-development of a site at the former “Matt’s of Cabra” public house, 2A Fassaugh¹ Avenue, Dublin 7, D07 TH77.
- **Application Context** – This application is made in accordance with the details set out in the Planning & Development (Large Scale Residential Development) Regulations 2021 whereby a S32B pre-application LRD Meeting was held with Dublin City Council on 23 September 2025 and the LRD Opinion was received on 21 October 2025. The final proposal reflects the discussions with the Planning Authority. DCC’s LRD Opinion states that following consideration of the issues raised during the LRD Meeting that the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act “constitutes a reasonable basis for an application.” This planning application is lodged within the 6-month validity period associated with the Opinion issued.
- **Report Objectives** – This Planning Report is intended to provide details on the proposed development; identify consistency with the relevant national and regional planning policy document together with guidelines issued under Section 28 of the Planning and Development Act (as amended); and identify compliance with local statutory planning policy in the form of the Dublin City Development Plan 2022-2028.
- **Site Context** – The site subject is located at 2A Fassaugh Avenue, Dublin 7, D07 TH77. The site itself is a vacant plot in a well-connected location in the Cabra area. The site currently occupies the former ‘Matt’s of Cabra’, now derelict, 1-2 storey structures fronting onto Fassaugh Avenue with an informal parking area to the front. Beyond the structures, the subject site is long, narrow, overgrown and greenfield in nature. There are limited views into the site from the public domain at present.
- **Planning History** – The site was previously subject to 3 no. planning applications (Reg. Ref No. 3420/16, Reg. Ref. No. TA29N.300666, and Reg. Ref. TA29N.312859, refer) in which development related to a grant of permission for student accommodation in 2016 and 2017 and the most recent proposal for residential development was refused in 2022.
- **The Proposal** – 249 no. student bedspaces in 32 no. clusters including 13 no. accessible units and 10 no. studio units with associated internal and external amenity spaces, public open space, bicycle parking and 1 no. accessible car parking space.
- **Site Zoning and Planning Policy Context** – The site’s zoning is split between ‘Z1: Sustainable Residential Neighbourhoods’, with an objective “to protect, provide and improve residential amenities”. and ‘Z3: Neighbourhood Centres’, with an objective “to provide for and improve neighbourhood facilities.”
- **Demand for Student Accommodation** - The Student Accommodation Concentration Report prepared by Brock McClure submitted as part of the application documentation demonstrates the necessity of this proposal. The Report details that the proposal is in an appropriate location and would not result in an overconcentration of student accommodation. There is an ever growing and increasing demand for student accommodation and the private rental market is currently suffering as a result of the demands that are on it.

¹ Note: There appear to be alternative, acceptable spellings for “Fassaugh” Avenue. Some resources use “Faussagh” while others use “Fassaugh”. For clarity, “Fassaugh” is the spelling favoured by the design team. As such, this spelling has been adopted across all inputs.





- **Local Services and Amenities** - The subject site is in close proximity to local services and amenities in the wider Cabra area. There are 36 no. third level colleges, universities and institutions within a 5 km radius of the subject site. The subject site is well connected to third level educational facilities with several institutions being within convenient walking / cycling distance and others are well connected by public transport. The subject site's city location benefits from a range of social infrastructure, including civic, cultural, community, healthcare, recreational facilities and educational services in the surrounding area.
- **Public Transport Connectivity** – The closest bus stop is located directly opposite the subject site and another bus stop sits approx. 100 m / 1-minute walk from the subject site. Both stops are served by the no. 120 Dublin Bus route. The site will also benefit from its proximity to the BusConnects network with several spine / branch routes serviced in the vicinity. The subject site is proximate to the Green Luas line. The closest stop being Cabra Luas stop located approx. 750 m / 10-minute walk from the subject site. The subject site sits approx. 1.2 km / 16-minute walk from the Broombridge Train Station.
- **Key Opportunity** – This site offers a significant opportunity for the delivery of purpose-built student accommodation and offers an alternative typology within the area. The proposal is appropriate to the site and sympathetic to its history and current use. It is appropriate to the site, the surrounding area and is well founded in planning terms. The applicant is committed to working with the Planning Authority to deliver on a suitable proposal at this site and we trust that any matters that may require further consideration will be addressed during the development management process.





2 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin are instructed by our client, **R & D Developments Limited (in Receivership), Grant Thornton, 13-18 City Quay, Dublin 2, D02 ED70** to lodge this Section 32B pre-application consultation request to Dublin City Council regarding the re-development of a site at the **former “Matt’s of Cabra” public house, 2A Fassaugh Avenue, Dublin 7, D07 TH77**.

This report is intended to identify consistency with the relevant national planning policy guidelines under section 28 of the Planning and Development Act, 2000 (as amended), and with local statutory planning policy in the form of the Dublin City Development Plan 2022-2028.

The overall application relates to a Large-Scale Residential Development (LRD) of 249 no. student accommodation bedspaces in 2 no. blocks ranging in height from 1-6 storeys and ancillary internal and external amenity spaces and a public plaza.

We wish to highlight from the outset, that our client is committed to working with the Planning Authority to deliver on a proposal that is appropriate to the site and the surrounding context at Fassaugh Avenue. We note at this point that the subject site is conveniently located in close proximity to a number of third-level colleges / universities and to high quality public transport. The site has the potential to deliver much needed student accommodation, which is appropriate to both the site and surrounding development.

The proposal reflects the feedback received:

- Section 247 pre-planning consultation carried out between the project design team and representatives from Dublin City Council on 10 June 2025.
- Section 32B pre-planning meeting held with the Planning Authority on 23 September 2025 and subsequent Section 32B Opinion prepared by the Planning Authority, issued electronically via email on 21 October 2025.

The proposal is in accordance with the relevant statutory documents and there is appropriate planning context for this proposal.

The proposed development is a high-quality purpose-built student accommodation (PBSA) scheme, with high amenity layouts, connections to public transport, communal amenities and generous bicycle parking facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding residential properties in the design of this scheme.

We ask the Planning Authority to consider these points in their review and trust that they will have regard to the fact of the demand for student accommodation at this location and that the current proposal will be well received on this basis.

The Planning Authority is now invited to review the contents of this submission and accompanying documentation to consider the proposal on its merits and in line with the relevant statutory policy context.

We confirm that this application for a Large-Scale Residential Development is made in the form of 1 digital copy, as required.

2.1 Applicant and Design Team

The applicant has appointed an experienced design team to prepare a site-specific purpose-built student accommodation scheme for the subject site at Fassaugh Avenue. The design team comprises of the consultants listed below:

- Reddy Architecture + Urbanism – Design Architects
- Brock McClure Planning & Development Consultants – Chartered Town Planners
- Lohan & Donnelly Consulting Engineers – Civil Engineers
- Áit Urbanism + Landscape Architects
- 3D Design Bureau – Visuals and Daylight & Sunlight Assessment
- O’Connor Sutton Cronin – M&E Engineers





- DNV – Ecologists & Environmental Consultants
- AWN – Environmental Management Consultants
- Wave Dynamics – Acoustic Consultants
- Martin Rogers Consulting – Traffic & Mobility Management
- ISM – Telecommunication Consultants
- ACSU – Archaeologists

2.2 Context for the Lodgement of this Application

DCC's LRD Opinion states that following consideration of the issues raised during the LRD Meeting that the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act **constitutes a reasonable basis for an application** for Large-Scale Residential Development. A Statement of Response to the LRD Opinion is submitted as a separate document. This Report provides a statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the CDP and relevant national and regional planning policies and guidance. This Planning Report complements the Statement of Response to the issues set out in the LRD Opinion and the reports and documents accompanying this application.

2.3 Website

We confirm that a digital copy of all material is also available to be viewed at the following website:
www.cabralrd2025.ie



3 Subject Site and Surrounding Context

3.1 Subject Site

The subject site is located at the former “Matt’s of Cabra” public house, 2A Fassaugh Avenue, Dublin 7, D07 TH77 and measures approx. 0.54 (gross) / 0.51 ha (net). The site itself is a vacant plot in a well-connected location in the Cabra area.

The site currently occupies vacant 1-2 storey structures fronting onto Fassaugh Avenue with an informal parking area to the front. The site was formerly known as ‘Matt’s of Cabra’, public house. Beyond the structures, the subject site is long and narrow and overgrown and greenfield in nature. There are limited views into the site from the public domain.



Figure 1 - Aerial Map with Subject Site outlined in Red



Figure 2 – Streetview from Fassaugh Avenue with Subject Site outlined in Red

The subject site and existing buildings are contained within Dublin City Council’s Vacant Sites Register, having entered the register on 26 August 2019 (Ref. VS-0453). We note that the existing buildings are of no architectural merit and are not on the list of Protected Structures. These structures are proposed to be demolished as part of the proposed development.

The site is bounded to the east by the rear of two-storey houses which front onto St. Attracta’s Road; to the southeast by Lanigans Funeral Home which also fronts onto Fassagh Avenue with a parking area to the front; to the west by Iarnrod Eireann railway line which at a lower level than the site and beyond which are the rear of two storey houses on Bannow Road. The ground levels to the rear of the site are at a higher level relative to the properties to the east and the railway line to the west, due to the presence of spoil, which in some cases is up to the top of the boundary walls of dwellings backing onto the site to the east.

Opposite the site, on the southern side of Fassagh Avenue, is a GAA club and grounds, a Gaelscoil and a Health Centre. There are local neighbourhood centre shops approx. 200m west. Mount Bernard Park is approx. 400 m to the east and the Royal Canal corridor is 300m to the north.

3.2 Wider Surrounding Context

The area surrounding the site features a variety of services, facilities, and amenities within 1km as illustrated in the figure below. The subject site is located in an area with an established and significant range of social, community and cultural infrastructure within walking distance, which also supports students.

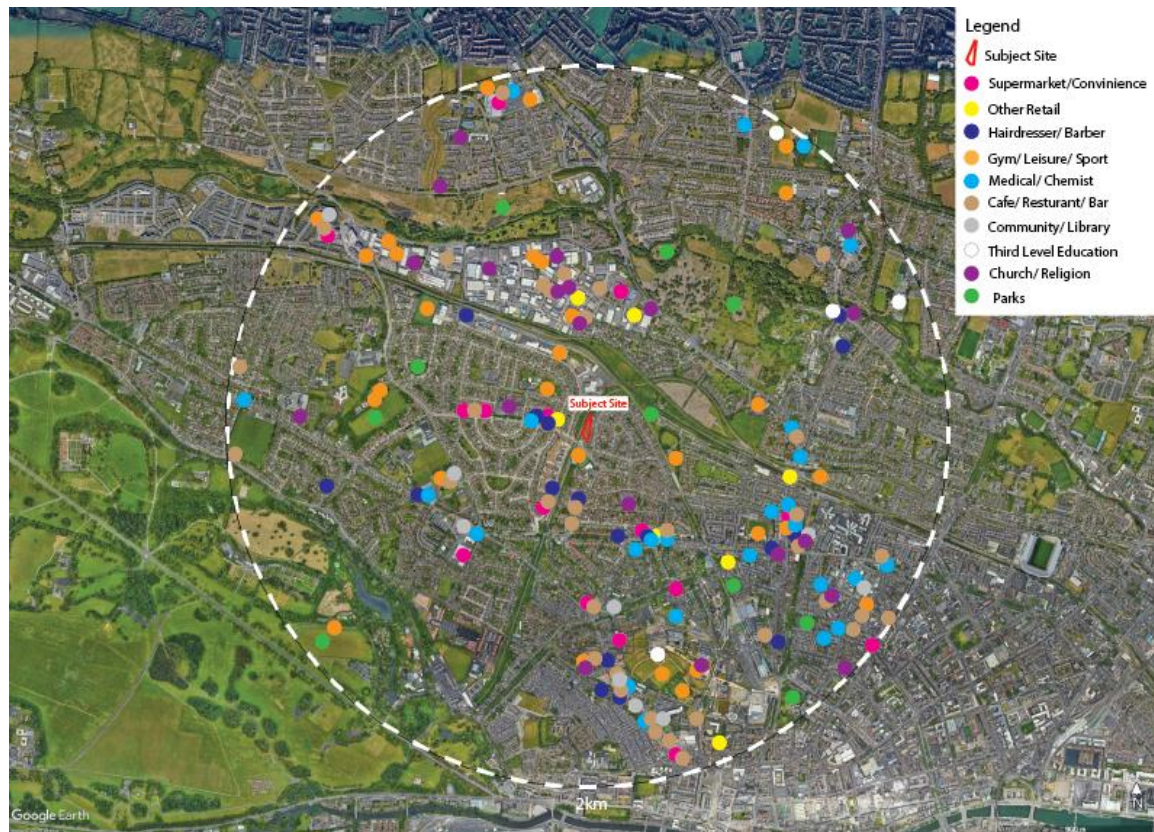


Figure 3 - Surrounding Social Infrastructure Map

As demonstrated in the context map above, the subject site’s city location benefits from a range of social infrastructure, including civic, cultural, community, healthcare, recreational facilities and educational services in the surrounding area. Considering this, the proposed development will support these existing facilities and will not put undue pressure on existing infrastructure.

Further, we note that the subject site is within walking distance of a number of neighbourhood centres with convenience retail providing day-to-day essentials. The subject site is also proximate to a vast quantity of green open spaces, including public parks, squares, sports clubs and stadiums. The subject

site is also within walking distance of the Phoenix Park, one of the largest enclosed public parks in any capital city in Europe.



Figure 4 - Surrounding Public Parks and Convenience Retail

3.2.1 Universities / Institutes / Further Education Facilities



Figure 5 – 3rd Level Institutions relative to the subject site

No.	3 rd Level Institution	Walking Distance from Site
1.	TU Dublin Grangegorman	1.8 km
2.	Teagasc College of Amenity Horticulture	2.4 km
3.	Whitehall College of Further Education	2.6 km
4.	Dorset College – Main Campus	2.6 km
5.	IBAT College Dublin (Frederick Street North)	2.6 km
6.	Portobello Institute	2.7 km
7.	TU Dublin Bolton Street	2.7 km
8.	Dublin College of Advanced Studies Ltd.	2.8 km
9.	National Learning Network – Roslyn Park College	3 km
10.	Griffith College Dublin City Centre Campus	3 km
11.	Cathal Brugha FET	3.1 km
12.	National College of Art and Design	3.2 km



13.	Cathal Brugha FET, North Strand Campus	3.5 km
14.	IBAT College (Wellington Street)	3.5 km
15.	City North College of Further Education	3.5 km
16.	Independent College	3.6 km
17.	DCU St. Patrick's Campus	3.6 km
18.	Trinity College Dublin	3.7 km
19.	CCT College Dublin	3.8 km
20.	Centre for Academic Practice	3.8 km
21.	City Colleges	3.8 km
22.	Liberties College	3.8 km
23.	Progressive College	3.8 km
24.	Dublin Business School	4.1 km
25.	Inchicore College of Further Education	4.2 km
26.	TU Dublin Aungier Street	4.3 km
27.	National College of Ireland	4.3 km
28.	Royal College of Surgeons in Ireland	4.4 km
29.	Plunkett College of Further Education	4.5 km
30.	Royal Irish Academy of Music	4.5 km
31.	Irish American University	4.5 km
32.	Marino College	4.5 km
33.	The Open University	4.8 km
34.	The National University of Ireland	4.9 km
35.	Dublin City University	4.9 km
36.	Marino Institute of Education	5 km

Table 1 - List of 3rd Level Colleges & Institutions in proximity to the Subject Site

From the above, there are 36 no. third level colleges, universities and institutions within a 5 km radius of the subject site. The subject site is well connected to third level educational facilities with several institutions being within convenient walking / cycling distance and others are well connected by public transport. We specifically highlight that the TU Dublin Grangegorman Campus is located approx. 1.2 km / 17-minute walking distance from the subject site.



3.3 Public Transport Accessibility

The subject site is well-located in terms of public transport accessibility.

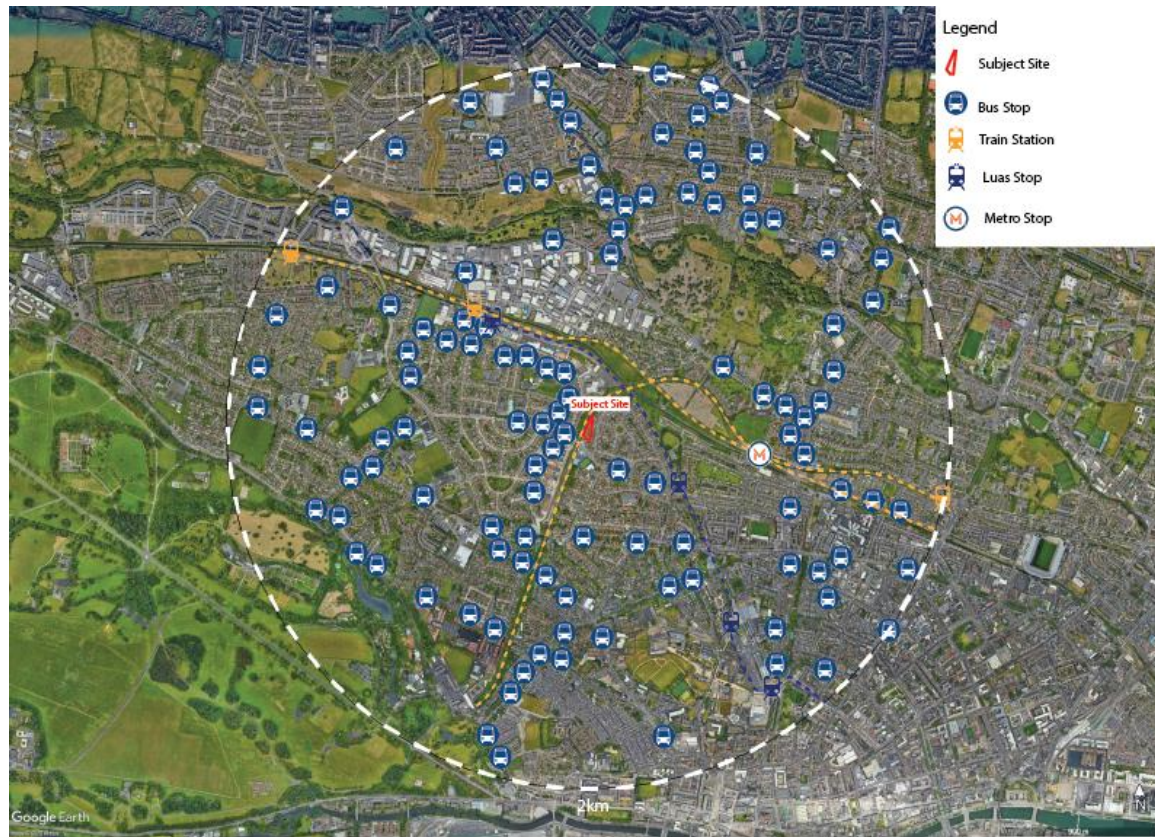


Figure 6 - Public Transport Context Map within 2 km radius of Subject Site

Local Bus Network

The closest bus stop is located directly opposite the subject site and another bus stop sits approx. 100 m / 1-minute walk from the subject site. Both stops are served by the 120 Dublin Bus route. The following routes are served in the vicinity of the subject site, as outlined in the table below:

Bus No.	Bus Route	Peak Frequency
Naomh Fionbarra GAA, Stop 4485 (directly across the subject site)		
120	Parnell Street – Ashtown Rail Station	10 mins
Drumcliffe Drive, Stop 4371 (approx. 250 m from subject site)		
122	Ashington – Drimnagh Road	15 mins
Quarry Road, Stop 77 (approx. 650 m from subject site)		
38	Burlington Road – Damastown	20 mins
38a	Burlington Road – Damastown	20 mins
38b	Burlington Road – Damastown	20 mins
38D	Burlington Road – Damastown	Single Departure
122	Ashington – Drimnagh Road	15 mins
Old Cabra Road, Stop 1906 (approx. 1 km from subject site)		
39	Burlington Road - Ongar	10 mins
39A	UCD Belfield - Ongar	5 mins
39X	Burlington Road - Ongar	2 daily departures
70	Burlington Road - Dunboyne	30 mins
Nephrin Road, Stop 4498 (approx. 1 km from subject site)		
70d	DCU - Dunboyne	Single Departure
122	Ashington – Drimnagh Road	15 mins
N2	Heuston Station - Clontarf	15 mins

Table 2 - Local Bus Routes and Frequency



BusConnects

We note to the Planning Authority that the local bus routes are subject to change due to the ongoing BusConnects programme to improve bus services in Dublin and other Irish cities. The Dublin Bus network is undergoing a phased redesign of its services and routes. The proposed network can be seen in the figure below.

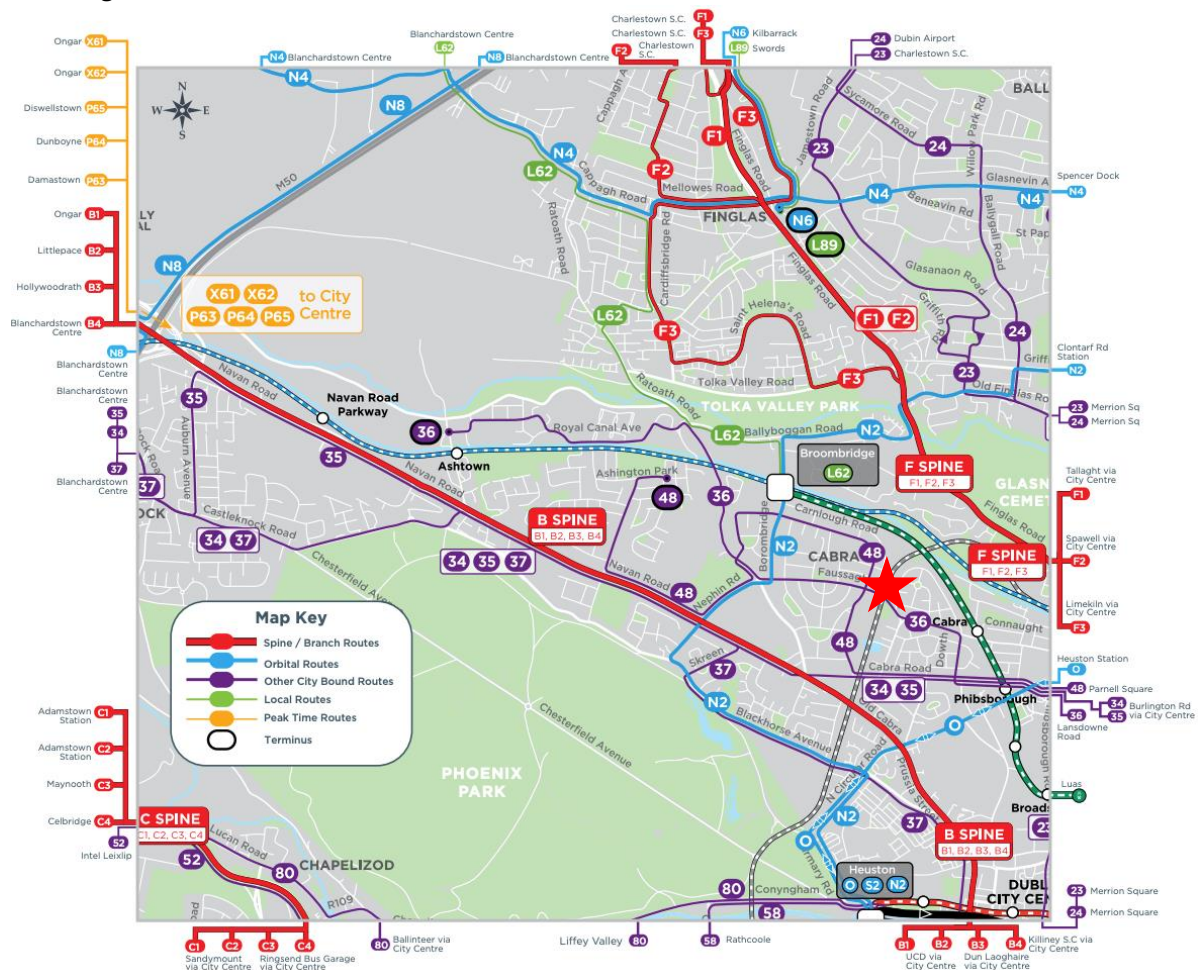


Figure 7 - BusConnects Cabra Area Map with subject site denoted by Red Star

The subject site is in proximity to the following routes:

B – Spine / Branch Route	- B1 (Ongar – UCD via City Centre) - B2 (Littlepace – UCD via City Centre) - B3 (Hollywoodwrath – Dun Laoghaire via City Centre) - B4 (Blanchardstown Centre – Dun Laoghaire via City Centre)
Peak Time Routes	- X61 (Ongar – City Centre) - X62 (Ongar – City Centre) - P63 (Damastown – City Centre) - P64 (Dunboyne – City Centre) - P65 (Diswellstown – City Centre)
Local Routes	L62 – (Blanchardstown Centre – Broombridge)
Orbital Routes	N2 (Clontarf Rd Station – Heuston)
Other City Bound Routes	34 (Blanchardstown Centre – Burlington Road via City Centre) 35 (Blanchardstown Centre – Burlington Road via City Centre) 36 (Ashtown – Landsdowne Road) 48 (Ashington Park – Parnell Square)

Table 3 - BusConnects Routes in proximity to subject site



Further, we note that the subject site sits approx. 1 km from the closest bus stop on the Blanchardstown to City Centre Core Bus Corridor Scheme.

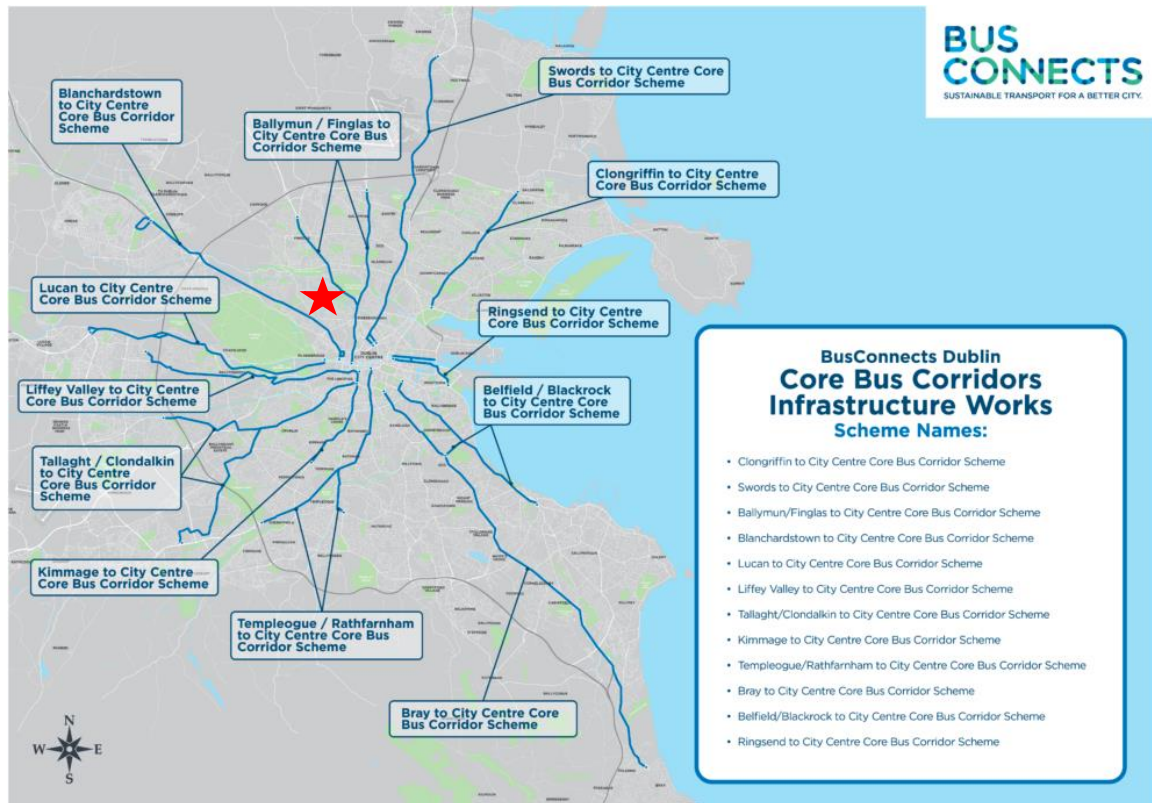


Figure 8 - BusConnects Core Bus Corridor Schemes with Subject Site identified by Red Star

Luas Services

The subject site is proximate to the Green Luas line. The closes stop being Cabra Luas stop located approx. 750 m / 10-minute walk from the subject site. The Green line (Broombridge – Brides Glen), with connections to the Red Luas line at Abbey Street. This forms part of the wider Luas network throughout the Greater Dublin Area and links the site directly to Dublin City Centre and the Red Luas line (Saggart – The Point), as set out in the following figure.

The frequency of the Luas Green Line at the Cabra Station is shown in the tables below:

Period	Southbound		
	Min	Avg	Max
05:33-07:00	6	14	9
07:00-10:00	5	20	14
10:00-16:00	12	14	13
16:00-19:00	4	16	10
19:00-00:19	11	15	13

Table 4 - Cabra Luas Stop Frequency (Monday - Friday)

Period	Southbound		
	Min	Avg	Max
06:33-10:00	15	20	15
10:00-16:00	14	16	14
16:00-19:00	14	14	14
19:00-00:19	13	22	15

Table 5 - Cabra Luas Stop Frequency (Saturday)



Period	Southbound		
	Min	Avg	Max
07:03-12:00	12	24	17
12:00-19:00	24	24	24
19:00-23:19	15	31	19

Table 6 - Cabra Luas Stop Frequency (Sunday)

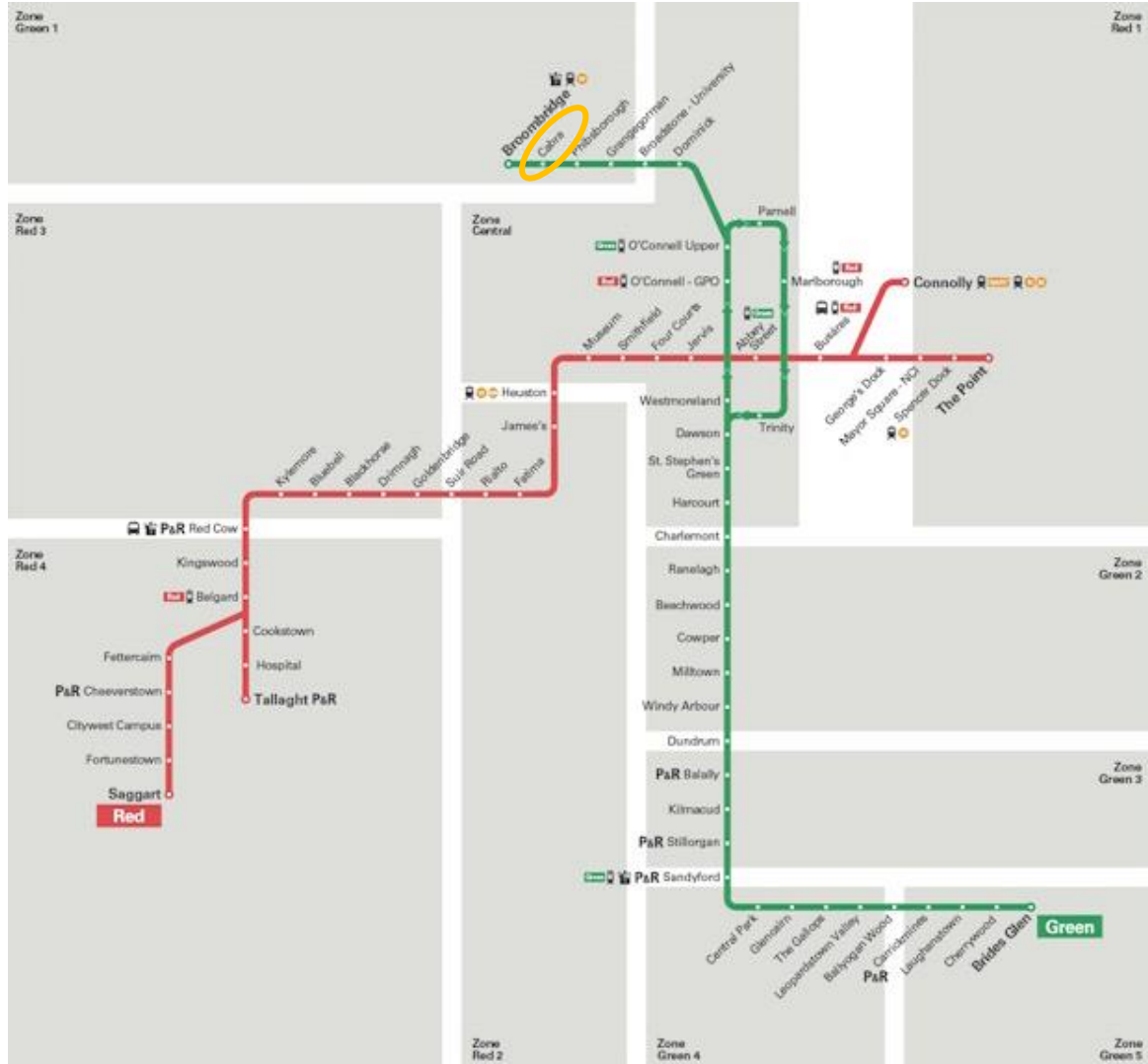


Figure 9 - Luas Network Map (Cabra Luas Stop outlined in Orange)

DART

The subject site sits approx. 1.2 km / 16-minute walk from the Broombridge Train Station. The Broombridge Station is serviced by InterCity and Commuter Trains with destinations such as Dublin Connolly, Dun Laoghaire, Grand Canal Dock, Sligo, M3 Parkway, Longford and Maynooth.

Further, we note that the Transport Strategy for the Greater Dublin Area 2022-2042 contains an objective for the provision of a new Dart Station to be located in Cabra:

Measure Rail6 – New Rail Stations

“The NTA, in conjunction with Irish Rail, will develop new rail stations at Cabra, Glasnvin, Heuston West, Kilemore, Woodbrook, west of Sallins, west of Louisa Bridge and west of Maynooth. Kishoge station will also open in the short term as development of the Clonburris SDZ is realised. Other stations will be considered where development patterns support such provision.”

As part of the rail alignment and upgrade works recently permitted by An Bord Pleanála (ABP-316119-23), under the DART+ South West programme, upgrade works are proposed to the Phoenix Park Tunnel



Rail adjoining the subject site however, no new train station was within the scope of works proposed and / or permitted.

As such, we note that the subject site will be within walking distances of a future new Dart Station which is earmarked between Cabra Road and Fassauga Avenue.

Proposed MetroLink

The subject site will also be located in proximity to the proposed Dublin Metrolink, which is planned to connect Dublin's City Centre to Dublin Airport and Swords in the north of Dublin. The planned service will have one station within relative proximity to the site in Glasnevin located approx. 1.5 km / 21-minute walk from the subject site.

Further we note, that a future crossing point across the Royal Canal is proposed at Shandon Park which will further increase permeability in the surrounding area and will have the potential to reduce the walking distance to the future Glasnevin Metro stop.



Figure 10 - Proposed MetroLink Map

Active Travel – Pedestrian & Cyclist Facilities

The majority of the roads approaching the subject site incorporate good quality pedestrian facilities. In the immediate vicinity of the subject site, pedestrians can benefit from an existing footpath of approximately 2 m width and sufficient street lighting. A signalised pedestrian crossing exists on Fassaugh Avenue approx. 78 m / 1-minute walk from the subject site. The following map outlines the reach from the subject site by foot within a 20-minute walk at 5-minute intervals.



Figure 11 - Subject Site Reach by Foot

At present, there is poor cycling infrastructure in the immediate vicinity of the subject site. However, we note that in January 2023, the Greater Dublin Area (GDA) Cycle Network Plan was adopted as part of the GDA Transport Strategy 2022-2042.

The Cycle Network Plan identified and determined in a consistent, clear and logical manner, the following cycle networks within the GDA:

- The Urban Cycle Network at the Primary, Secondary and Feeder level;
- The Inter-Urban Cycle Network, linking the relevant sections of the Urban Network and including the elements of the National Cycle Network within the GDA. The Inter-Urban Network also includes linkages to key transport locations outside of urban areas such as airports and ports; and
- The Green Route Network that are cycle routes developed predominately for tourist, recreational and leisure purposes.

From the extracted Dublin City Centre Proposed Cycle Network map below, we note that Fassaugh Road is proposed to become a 'Secondary Route' and the subject site will also be proximate to 'Primary' routes on Navan Road and the R108, and a Green Route at Shandon Park. Further, a future crossing point is indicated at Shandon which will further improve walking and cycling accessibility across the Royal Canal.

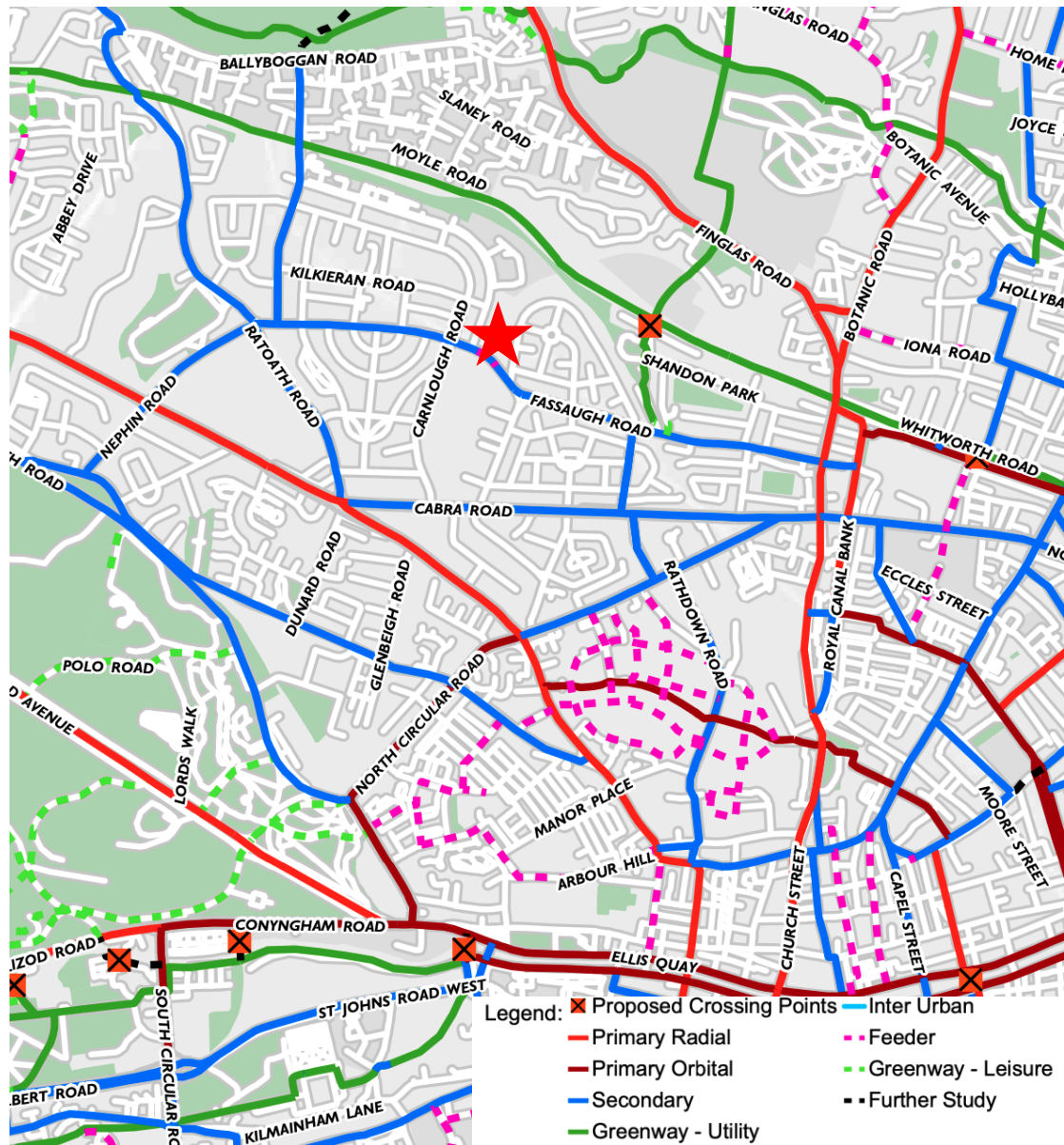


Figure 12 - GDA Cycle Network Map with subject site denoted by Red Star



4 Planning History

The planning history pertaining to the subject site is set out below for the convenience of the Planning Authority:

Reg Ref. [3420/16](#)

Planning permission was **GRANTED** for the development of 19 no. residential units and one retail unit in addition to demolition of the "Matts of Cabra" public House building; Construction of a 4 storey retail and residential block; 8 no. apartments from first-third floor levels (2 no. 1 bedroom, 4 no.2 bedroom & 2 no. 3 bedroom) with balconies / terraces on the east, south and west elevations; 11 no. 3 storey 3 bedroom houses (consisting of 5 no. terraced and 6 no. semi-detached units) to the rear; 30 no. surface level car parking spaces and 12 no. covered bicycle parking spaces (associated with the development); Public open space, communal and amenity open space: Provision of a new vehicular entrance from Fassaugh Avenue; 2 no. loading bays on Fassaugh Avenue; Associated landscaping and boundary treatment (including new retaining walls); Bin stores; and all associated site development and engineering works necessary to facilitate the development.

Permission was granted on the 10th of May 2017. The decision was subject to 28 no. conditions.

An Bord Pleanála Case Ref. [TA29N.3 00666](#)

Permission was **GRANTED** for the demolition of the former "Matts of Cabra" public house and associated structures, and the construction of a mixed-use strategic housing development (SHD) comprising student accommodation consisting of 208 no. bedspaces, vehicular access onto Fassaugh Avenue, and all other site development works.

The proposed development comprised specifically of the demolition of existing public house and associated outbuildings (798.9 sq.m.); the removal of stockpile of material from the rear of the site; 3. no. 4/5 storey blocks containing 208 no. student bedspaces in 44 no. 4/5/6/7/8 bed units and 10 no. studio units; associated facilities including a central access lobby, a central hub, recreation spaces, administration areas (and proposed to be used as tourist accommodation outside of term time); 2 no. retail units (657.65 sq.m.) fronting onto Fassaugh Avenue; Vehicular access to Fassaugh Avenue and set-down area; Site development works including landscaping, amenity areas, roof garden, car and cycle parking, refuse storage, ESB substation, and connection to the public watermain and sewer.

Permission was granted on the 12th of April 2018. The decision was subject to 19 no. conditions.

An Bord Pleanála Case Ref. [TA29N.312859](#)

Permission was **REFUSED** for the demolition of the former "Matt's of Cabra" public house and associated structures, and construction of 117 no. apartments and associated site works.

The application consisted of Demolition area of c.791 sqm, the construction of a part one number to part seven number storey (over basement) development with 117 total built to rent apartments (67 one-bed, 50 two-bed), a café or retail unit, residential amenity spaces at ground level (work/study/function room, lounge). The proposed development totalled a gross floor area above ground of c.9668 square metres, basement of 1384 sqm (car and bike parking/services), and a gross floor space of 9,519 sqm.

Permission was refused on 9th June 2022 for the following reasons:

"1. Having regard to the Urban Development Building Height Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in December 2018, it is considered that the proposed development by reason of its design, scale, bulk and mass would be out of character with the context of the site, would represent a visually prominent and monolithic form of development relative to its immediate environment, would be visually obtrusive, and would seriously detract from the visual amenities and character of the area when viewed from the east and from the west, and in combination with the design in terms of façade treatment and architectural expression, would not constitute an adequate design response to the context and opportunity of this urban infill site, and would not, therefore, be in accordance with the criteria set out under section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in December 2018.

Applicant Response to Reasons for Refusal

From the outset, we note to the Planning Authority that since the decision was made on the above mentioned application, the planning context has significantly changed including the publication of the Dublin City Development 2022-2028 and the Sustainable Residential Developments and Compact Settlement Guidelines for Planning Authorities, 2024 which place significant emphasis on sustainable and compact development.

We note that following this decision, the applicant, R & D Developments Limited (in Receivership), Grant Thornton, made a decision to consider in significant detail the commentary of the Council and An Coimisiún Pleanála at that time (formerly, An Bord Pleanála), and identified the clear issues raised which would need to be brought forward and responded positively to in any new design proposal.

Reddy Architecture + Urbanism were appointed following a lengthy design competition process by the applicant, which involved a number of architectural practices and involved an assessment of site-specific design concepts envisioned for the subject location. The process for selecting a “site specific” architectural response has, in our view, responded positively to the range of valid issues expressed through this LRD process and the previous SHD decision.

The proposed design of the buildings provides a contemporary architectural form which places a significant emphasis on protecting adjoining residential amenity through the modulation of heights, appropriate set back distances and provision of angled windows to prevent excessive overlooking. In addition, this site-specific design approach has resulted in the creation of an active and attractive street frontage and public plaza area fronting Fassagh Avenue.

The criteria set out under Section 3.2 of the Building Height Guidelines are as follows, followed directly by our response:

“At the scale of the relevant city/town:

- ***The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.***
- ***Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.***
- ***On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.”***

Applicant Response

- The site is very well served by public transport as follows:
 - **Urban Bus:** The subject site is located in close proximity to high-frequency urban bus stops. There are several bus stops in the immediate vicinity of the site offering connections to Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area. There is a bus stop (No. 4485) located directly across from the subject site. There is another bus stop (no. 4371) located 255 m from the subject site on Drumcliffe Drive.
 - **BusConnects:** The subject site is located approx. 1 km from the Navan Road Bus Stop No. 4498 which is serviced by BusConnects route N2 which runs at a frequency of 15 minutes. The subject site will be in proximity to the B Spine / Branch Route, Peak Time Routes, Local Routes, Orbital Routes and Other City Bound Routes as the BusConnects scheme continues to roll out. Further, we note that the Navan Road approx. 1 km from the subject site is a Core Bus Corridor.

- **Luas:** The subject site sits approx. 750 m / 10-minute walk from the Cabra Luas stop which is serviced by the Green Luas line between Broombridge and Brides Glen. The peak time frequency of the Luas is 4-6 mins.
- **DART:** The site is also located approx. 1.2km (16-minute walking distance) from the Broombridge Train Station. This station is serviced by InterCity and Commuter Trains with destinations to Connolly Station, Dun Laoghaire, Grand Canal Dock, Sligo, M3 Parkway, Longford and Maynooth.
- **Proposed MetroLink:** The subject site currently sits approx. 1.5 km from the planned Glasnevin Metro stop.
- Every effort has been made by the scheme architect and landscape architect to visually assimilate the development with the surrounding built and natural environments to provide a vibrant scheme. In addition, we refer the Planning Authority to the accompanying Landscape and Visual Impact Assessment Report prepared by Áit Urbanism + Landscape Ltd. where it is concluded that the proposed development will be seen as a positive addition to the area.
- The proposed development makes a positive contribution to the built and natural environment of this urban area. The proposal provides generous circulation spaces, paths, public and communal open spaces, public plaza and active ground floor frontages creating a visual interest in the streetscape.

“At the scale of district/neighbourhood/street:

- *The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape*
- *The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*
- *The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).*
- *The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*
- *The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”*

Applicant Response

- The landscape proposal greatly enhances tree and shrub planting on site with pockets of planted communal and public open spaces dispersed throughout the development, creating an improved sylvan residential setting.
- Materials and finishes have been well considered to respond to the surrounding environment. A limited palette of high-quality, robust materials is proposed through the scheme. A textured blond coloured brick throughout, altering orientation or pattern in areas to distinguish use, or for way-finding purposes. The boundary walls and additional structures such as the substation and refuse area all feature the same brick as the main block on site in order to maintain material continuity.
- The proposal submitted enhances the urban design context and provides generous public and private open spaces, paths, public plaza and active uses and creates a visual interest in the streetscape and enhances a sense of scale and enclosure.
- The proposal makes a positive contribution to the improvement of legibility through the subject site into the wider urban area through the provision of active frontages at ground floor level.
- The orientation of the blocks and setbacks from the front boundary is appropriate and in keeping with the surrounding settings.

- The proposed development brings a new use to the locality contributing positively by adding a wider and varied mix of uses in the area.

“At the scale of the site/building

- *The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*
- *Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.*
- *Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”*

Applicant Response

- The form, massing, and height of the proposed development have been thoughtfully and strategically designed to optimise environmental quality both within the site and in relation to its surroundings. Careful modulation of the building envelope ensures that access to natural daylight and ventilation is maximised for both future occupants of the development and neighbouring properties. Additionally, the orientation and stepped massing have been arranged to preserve key view corridors and reduce visual bulk, contributing to a more harmonious integration into the existing urban fabric.
- To assess the potential effects on surrounding properties, a daylight and sunlight study has been undertaken in accordance with recognised guidelines. The findings of this initial assessment indicate that the proposed development will not result in any significant or unacceptable loss of daylight or sunlight to adjacent residential buildings. Overshadowing has been minimised through strategic placement and variation in building heights, ensuring that the amenity of neighbouring occupiers is safeguarded. This demonstrates a commitment to responsible design and sensitivity to the existing context.

2. The proportion of single aspect apartments in the proposed development and quality of the internal layout, specifically the design of excessively long internal corridors with lack of natural light and adequate ventilation, in addition to the design and location of balconies, and positioning of windows giving rise to overlooking between apartments, would fail to provide an adequate level of residential amenity for future occupants of the scheme and would be contrary to guidelines issued for Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2020.”

Applicant Response

It is acknowledged that the proposed development is intended for use as student accommodation, a typology which is typically subject to different design standards compared to conventional apartment or residential schemes. While student housing does not require adherence to the same stringent internal space or amenity benchmarks as standard residential developments, the design team has nonetheless adopted best practice principles throughout the scheme to ensure a high-quality living environment for future occupants. For a student accommodation development, it is reasonable to expect occupants to spend more time in their ‘bedrooms’ than in a typical dwelling, as these rooms also serve as study and private living areas. In recognition of this, a higher SDA target value of 150 lux has been applied to bedrooms, exceeding the 100 lux level recommended by the BRE Guidelines. Despite

this higher standard, a high compliance rate (c. 99% without trees and c. 97% with trees) has been achieved.

In particular, the layout avoids the use of long, enclosed internal corridors; an approach that not only enhances wayfinding and safety but also contributes to a more comfortable and sociable internal environment. The design ensures adequate levels of natural ventilation and provides access to both sunlight and daylight within habitable rooms and shared spaces, creating a healthy and welcoming internal atmosphere. Furthermore, the development has been carefully planned to prevent any overlooking into adjacent residential properties, thereby preserving the privacy and amenity of neighbouring occupiers. These measures collectively demonstrate a thoughtful and responsible approach to student housing that aligns with contemporary expectations for sustainability, liveability, and contextual sensitivity.

3. The Board is not satisfied on the basis of the Daylight, Sunlight and Shadow Report submitted, that the proposed development would not be detrimental to the established residential amenity of existing dwellings to the east, and the failure of a number of proposed apartments to reach minimum daylight target standards in the absence of robust mitigating compensatory measures, would result in poor residential amenity for future occupants. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”

Applicant Response

We refer the Planning Authority to the accompanying Daylight & Sunlight Assessment Overview prepared by 3D Design Bureau and the results can be summarised as follows:

Effect to Daylight – Vertical Sky Component (VSC):

In total, 71 no. windows were assessed across 23 no. properties from 285 to 329 St. Attracta Road. As the proposed development is on a greenfield site, some level of effect is expected.

The effect on 9 no. of the assessed windows (across 5 properties) has been categorised as ‘moderate adverse’. It is important to note that all windows showing a ‘moderate adverse’ effect are part of rear extensions. These extensions bring the windows closer to the site boundary, resulting in a higher level of impact than would be experienced on the original building facade.

Of the remaining windows, approximately half meet the BRE recommendations for VSC impact and are categorised as ‘negligible’. The impact on the other half is considered ‘minor adverse’.

The results of the impact assessment indicate that the vast majority of neighbouring residential windows will experience a ‘negligible’ or ‘minor adverse’ level of effect. This is consistent with urban regeneration on a mostly vacant site that is somewhat constrained. Regarding the ‘moderate adverse’ impacts to daylight (VSC) identified at 289, 293, 295, 297 and 299 St. Attracta Road, this report demonstrates that the higher level of effect, in these instances, when compared with the ‘minor adverse’ level of effect in similar receptors, is attributable to the existing ground-floor rear extensions of those properties. Consequently, the development potential of the subject site may be restricted unless this level of effect is deemed acceptable by the planning authority.

Effect to Sun on Ground (SOG):

A SOG impact assessment conducted on 29 no. rear gardens at 273 to 329 St. Attracta Road on March 21st shows that all gardens will comfortably continue to meet the relevant BRE Guidelines, meaning sunlight access will not be adversely affected. The one exception is the garden of 277 St Attracta Road, which is categorised as ‘non-applicable’ (n.a.). This classification is used because its baseline sunlight access is already extremely low, with only 0.4% of the garden receiving two hours of direct sunlight on March 21st. Since this value remains unchanged at 0.4% in the proposed state, the actual effect on this garden should be considered negligible.

Scheme Performance – Spatial Daylight Autonomy (SDA)

For a student accommodation development, it is reasonable to expect occupants to spend more time in their ‘bedrooms’ than in a typical dwelling, as these rooms also serve as study and private living areas. In recognition of this, a higher SDA target value of 150 lux has been applied to



bedrooms, exceeding the 100 lux level recommended by the BRE Guidelines. Despite this higher standard, a high compliance rate (c. 99% without trees and c. 97% with trees) has been achieved.

Scheme Performance – Sunlight Exposure

All proposed ‘units’ meet the recommended level of ‘Sunlight Exposure’ because while some individual bedrooms may have low sunlight access due to their orientation, they are clustered with a well-sunlit communal room (LKD). This design ensures all students have access to an internal space with sufficient sunlight, with the majority of those spaces achieving ‘high’ sunlight levels.

Scheme Performance – Sun on Ground

All assessed spaces comfortably exceed the recommended minimum levels for Sun On Ground as set out in the BRE Guidelines. This indicates that future occupants will have access to communal outdoor spaces with excellent neighbouring potential while neighbouring occupants will also benefit from a well sun-lit public open space.

The results show that the proposed development has been designed in a way, in so far as possible, to respect existing residential amenity and the proposed development will achieve acceptable levels of sunlight / daylight.

We trust that the submitted scheme addresses the concerns of the Planning Authority in this regard. Further, we emphasise to the Planning Authority that the principle of a student accommodation development has been established as acceptable on the subject site by way of Reg. Ref. TA29N.300666.



5 Pre-Planning

5.1 S247 Pre-Planning Consultation

The evolution of the scheme has been brought about by engagement with the Planning Authority of Dublin City Council. The Applicant and Design Team formally engaged in preliminary discussions with the Planning Authority presenting a draft outline of the proposed development and a meeting was held on 10th June 2025.



Figure 13 - Proposed Site Layout Plan for the S247 Stage

The proposal submitted as part of the initial S247 pre-planning pack provided for a Large-Scale Residential Development for the following:

- 232 no. student bedspaces including 12 no. accessible units and 8 no. studio units in 2 no. blocks ranging in height from 1-6 storeys;
- Internal amenity spaces (approx. 517.1 sqm) including 2 no. student lounge areas, laundry room, reception / office / kitchen / tearoom at ground floor level and a games and TV area at first floor level;

- External amenity areas (approx. 1,072.5 sqm) including 2 no. outdoor terraces at first floor level (66.8 sqm) and third floor level (193.1 sqm)
- Approx. 338 sqm of public open space.
- Service / plant room facilities including a refuse store area, bike store area and general back of house area at surface level;
- A total of 563.5 sqm of public open space;
- A total of 275 no. bicycle parking spaces have been provided at surface level (224 no. long term bicycle parking spaces, 2 no. e-bike parking spaces, 4 no. cargo bike parking spaces and 45 no. short stay / visitor bicycle parking spaces);
- Vehicular access from Fassagh Avenue and 4 no. staff car parking spaces and 1 no. accessible car parking spaces.

The development shall also provide for all associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; all landscaping works; boundary treatment; internal footpaths; electrical services; and all associated site development works.

5.2 S247 Feedback

Below is a summary of the points raised by DCC at this meeting and we note that the matters have been addressed as design progressed to the S32B stage:

- Very supportive of any development on this site and principle of student accommodation accepted under zoning objective.
- Consideration required for the provision of residential use on site.
- Verified views and visual impact analysis will be required.
- Investigate opportunities for a mix of uses particularly on Fassagh Avenue elevation to activate frontage.
- Preference for a singular external material i.e. textured brick.
- Operational Management Plan will be required to set out maintenance, supervision, curfews etc.
- Site Specific Flood Risk Assessment required.
- Continuous tree canopy along the boundary with the residential dwellings is preferred.
- Bicycle parking quantum acceptable. Refer to National Cycle Design Manual for quality and design standards. Minimum 5% cargo bike spaces required.

Comments from the Dublin City Council representatives presented at this meeting were considered and the design team prepared an updated proposal based on the feedback received for the S32B stage.

5.3 Section 32B LRD Meeting

A subsequent S32B LRD Meeting was held with the Planning Authority on 25 September 2025.

The proposal submitted addressed comments raised by DCC at the S247 consultation, and provided for a Large-Scale Residential Development, which in summary, consisted of the following:

- a) Demolition of the former 'Matt's of Cabra' public house and associated structures.
- b) Construction of 249 no. student bedspaces arranged in 32 no. clusters of 6, 7, 8 and 9-bedroom units (including 13 no. accessible units and 10 no. studio units) each with associated shared kitchen/living/dining areas in 2 no. blocks ranging in height from 4-6 storeys;
- c) Internal amenity spaces (approx. 345.8 sqm) including 2 no. student lounge areas, laundry room, postal room and a reception / office / kitchen / tearoom;
- d) External amenity areas (approx. 2,287.3 sqm) including 1 no. outdoor terraces at fourth floor level of Block A (193.1 sqm);

- e) Approx. 350 sqm of public open space in the form of a public plaza fronting Fassagh Avenue;
- f) Switch room, ESB substation, sprinkler room and bin storage all in a single storey services building along the eastern site boundary;
- g) A total of 308 no. bicycle parking spaces at surface level (258 no. long term, covered bicycle parking spaces, 12 no. cargo bicycle parking spaces and 50 no. visitor bicycle parking spaces);
- h) Vehicular access to be provided from Fassagh Avenue and 1 no. accessible car parking space.

The development will also provide for all associated service connections, public lighting, cold water storage and thermal store room, hard and soft landscaping, planting, formal activity equipment, boundary treatment, nature-based SuDS features, green roofs and all associated site clearance, excavation and development works above and below ground.



Figure 14 - Site Layout Plan as submitted for S32B Stage

We now refer the Planning Authority to the Statement of Response to LRD Opinion prepared by Brock McClure Planning & Development Consultants for a detailed summary of the points raised and the Applicant's Response to the LRD Opinion items.

5.4 Pre-Planning Conclusion

As evidenced above, all feedback received from DCC has been closely considered in the design of the proposal. We trust that the final proposal submitted addresses the concerns raised by the Planning Authority at both the Section 247 consultation and subsequent S32B LRD Meeting and Opinion.

In this regard it is submitted that the mixed-use development as proposed has evolved to be a high-quality development completely adherent to local and national standards and guidelines and fully in accordance with the proper planning and sustainable development of the area. An outline of the final proposed development is now provided for Limerick City & County Council below.

5.5 Consultations with Irish Rail

Irish Rail issued a Railway Order against the subject site which came in effect on 13 November 2024 (ACP Ref. 316119, refers) to facilitate future development of the Dart+ South West project however, the Notice to Treat has yet to be issued. Throughout the LRD process, the applicant and design team have engaged extensively and in good faith with Irish Rail given their vested interest as a result of the Railway Order to facilitate a workable solution that would satisfy the requirements for both the proposed purpose built student accommodation and any future development to the railine. The applicants and design team had a clear intention to respond to any operational, safety or land-use considerations relating to the subject site and its proximity to the railway corridor. A total of 5 no. meetings between the applicants, the design team, Irish Rail and their engineers were held as follows:

- Meeting 1 – Initial Introductions: 19 February 2025
- Meeting 2 – Design Team Introductions / Overview of Proposal: 11 July 2025
- Meeting 3 – Design Updates (Redline Issues Raised & Addressed): 07 August 2025
- Meeting 4 – Further Design Discussion: 04 September 2025
- Meeting 5 – Irish Rail Position Rejecting Any Design on Site: 02 October 2025

Despite this sustained engagement it was not possible to reach a clear or workable understanding of Irish Rail's requirements for any form of development on the subject site. The absence of certainty or a defined programme for this future proposal meant that the applicant was left without a clear pathway to meaningfully address or accommodate Irish Rail's concerns, notwithstanding repeated efforts to do so.

This outcome is particularly regrettable in the context of the ongoing national housing crisis, which continues to have acute impacts across Dublin and the wider State. There is a well-documented and urgent shortage of all forms of housing, including purpose-built student accommodation, which plays a critical role in relieving pressure on the private rental sector and freeing up existing housing stock for families and long-term residents. In this context, and having regard to the Government's stated policy objective to significantly accelerate housing delivery, the applicant could not reasonably continue to defer or stall the progression of the project in the absence of clarity on a future proposal.

We trust that the Planning Authority will have due regard have due regard to the extensive and sustained engagement undertaken by the applicant and the design team.

It is respectfully submitted that the existence of a Railway Order, in the absence of a Notice to Treat or any clear timeline for implementation, should not unduly sterilise the lands or preclude the delivery of much-needed residential accommodation.

The proposed development has been carefully designed to respond to its sensitive context, represents an efficient and appropriate use of serviced urban land, and aligns with national, regional and local planning policy objectives aimed at addressing the acute housing shortage, supporting sustainable transport patterns, and promoting compact growth. In these circumstances, it is considered that the proposal constitutes a balanced and proportionate response to competing policy considerations and that a grant of permission would be both reasonable and in the wider public interest.

6 Proposed Development



Figure 15 - CGI View of Proposed Development from Fassaugh Avenue

6.1 Summary Development Description

The proposed development provides for a Large-Scale Residential Development, which in summary, shall consist of:

- a) Demolition of the former ‘Matt’s of Cabra’ public house and associated structures (approx. 376.55 sqm).
- b) Construction of a purpose-built student accommodation scheme consisting of 249 no. student bedspaces arranged in 32 no. clusters of 4, 7, 8, 9 and 10-bedroom units (including 13 no. accessible units and 10 no. studio units) each with associated shared kitchen/living/dining areas in 2 no. blocks ranging in height from 1-6 storeys;
- c) Internal amenity spaces (approx. 347.1 sqm) including a student lounge area, laundry room, postal room and a reception / office / kitchen / tearoom across the ground floor and first floor levels;
- d) External amenity areas (approx. 2,971.4 sqm) including 1 no. outdoor terrace at fourth floor level of Block A (193.1 sqm);
- e) Approx. 405.5 sqm of public open space in the form of a public plaza fronting Fassaugh Avenue;
- f) Switch room, ESB substation, sprinkler room and bin storage all in a single storey services building along the eastern site boundary;
- g) A total of 308 no. bicycle parking spaces at surface level (258 no. long term, covered bicycle parking spaces including 12 no. cargo bicycle parking spaces and 50 no. visitor bicycle parking spaces);
- h) Vehicular access to be provided from Fassaugh Avenue;
- i) 1 no. accessible car parking space proposed within the site;
- j) It is proposed that the development will be used for short term tourist or visitor accommodation outside of academic term times, in accordance with the definition of student accommodation.

The development will also provide for all associated service connections, public lighting, cold water storage and thermal store room, hard and soft landscaping, planting, formal activity equipment,

removable bollards, tactile paving, boundary treatments, nature-based SuDS features, green and blue roofs, and all associated site clearance, excavation and development works above and below ground.



Plot Ratio	3.3
Site Coverage	29.9%
Proposed Accommodation	
Cluster Mix	- 1 no. 4 bed cluster - 12 no. 7 bed clusters - 14 no. 8 bed clusters - 1 no. 9 bed cluster - 4 no. 10 bed clusters
Total Clusters	32 no.
Total No. Twin Studios	10 no.
Total No. Accessible Rooms	13 no.
Total No. Bedrooms	239 no.
Total No. Bedspaces	249 no.
Other Amenities and Support Facilities	
Car Parking	1 no. accessible parking space.
Bicycle Parking	Total: 308 bicycle parking spaces - 258 no. resident spaces incl. 12 no. cargo bike spaces - 50 no. visitor spaces and
Internal Amenity Space	347.1 sqm
Communal Open Space	2,971.4 sqm
Public Open Space	405.5 sqm

Table 7 - Key Proposed Development Statistics

6.3 Detailed Description

Demolition

The proposed development includes the complete demolition of the former “Matt’s of Cabra” public house and associated ancillary structures (approx. 376.55 sqm) currently occupying the site frontage to Fassagh Avenue. These buildings, which are of no architectural or historic merit and are not included on Dublin City Council’s Record of Protected Structures, are in a state of disrepair and no longer serve a viable use. Their removal will enable the regeneration of this prominent urban site, replacing a vacant and underutilised landholding with a high-quality, purpose-built student accommodation development. The demolition works will also include the clearance of overgrown and unused areas to the rear of the site, thereby remediating the land and creating a safe and sustainable platform for redevelopment. In addition, we note that the principle of demolition has been established by Reg. Ref. ABP-300666-17 wherein permission was granted for the demolition of all structures on site and the construction of a student accommodation scheme.

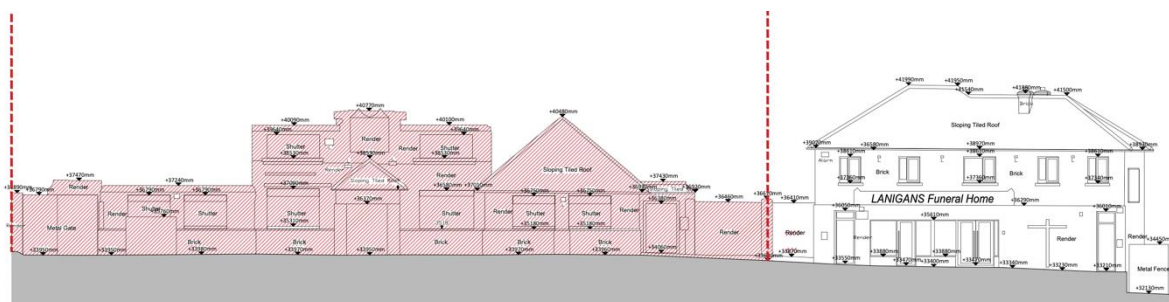


Figure 17 - Existing Front Elevation proposed for demolition (hatched red)

We refer the Planning Authority to the accompanying Demolition Justification Report prepared by Lohan & Donnelly Consulting Engineers for further information in this regard.

Student Accommodation

The development provides for the delivery of 249 no. student bedspaces arranged in 32 no. high-quality cluster units varying in size between 4, 7, 8, 9 and 10 bedrooms. The scheme also includes 13 no. accessible units and 10 no. studio units to ensure inclusivity and flexibility of accommodation types.

Each cluster will be provided with generous shared kitchen/living/dining areas, designed to foster a sense of community and social interaction among students while also supporting independent living.

The proposed general cluster apartments are generally laid out with the bedrooms positioned on either side of an entrance hall that extends from the front door to the shared kitchen / living / dining area. The typical bedroom modules contain ensuite bathrooms, single bed, wardrobe, desk and circulation space.

Twin studios will include 2 no. single beds, an ensuite, 2 no. desks, 2 no. wardrobes and circulation space

Internal Amenity Spaces

The scheme delivers a comprehensive range of internal and external amenity spaces to provide students with a high standard of living and recreational facilities.

Internal amenity provision (approx. 347.1 sqm) includes:

Type	Location	Area
Laundry Room	Ground Floor	19.3 sqm
Postal Room	Ground Floor	21.2 sqm
Reception / Office / Kitchen Tea Room & Communal Open Space	Ground Floor	120.9 sqm
Student Lounge	First Floor	185.7 sqm
Total		347.1 sqm

Table 8 - Internal Amenity Space Breakdown

These spaces are designed to encourage social interaction, provide practical day-to-day facilities, and create a vibrant, community-focused atmosphere within the development.

External Amenity Spaces

The proposed development delivers a generous quantum of high-quality external amenity space measuring approximately 2,971.4 sqm, designed to support the wellbeing of future residents and foster a vibrant student community. These areas comprise a carefully curated mix of landscaped courtyards, circulation routes, and an elevated terrace.

At surface level, the external amenity spaces are structured into three distinct landscape zones, each designed with a unique character and function:

1. Arrival Zone (South)

Positioned at the primary entrance to the development, this zone establishes a welcoming first impression. It is designed as a green and inclusive forecourt, with high-quality seating integrated within areas of soft landscaping and extensive planting. The space provides a calm, sociable threshold between the public realm of Fassagh Avenue and the private residential environment within the site.



Figure 18 - CGI of proposed arrival zone area

2. Sports and Activity Zone (North)

This area forms the active heart of the scheme, encouraging recreation, fitness, and informal social gatherings. Key features include:

- A dedicated hang-out area for casual use
- A half basketball court to promote physical activity
- A large on-ground chess set to combine play with learning and interaction

The surfaces in this zone will be finished in joyfully coloured porous asphalt, ensuring visual vibrancy while supporting sustainable surface water drainage through permeability. This playful design language reinforces the scheme's emphasis on health, activity, and community engagement.



Figure 19 - CGI of proposed northern activity zone

3. Activity and Relax Garden Zone (West)

Located along the western edge of the accommodation buildings, This area comprises a series of 'pocket gardens,' each with a distinct function. Some gardens offer sports activities such as table

tennis, calisthenics, and an outdoor gym, while others provide social spaces for picnicking and BBQs, as well as more tranquil seating areas surrounded by lush planting.

These zones are interconnected by a distinctive “red ribbon” pathway, a continuous circulation route finished in coloured porous asphalt. This design element provides a unifying feature across the landscape, guiding residents through the site while enhancing accessibility and cohesion.

At the fourth-floor level of Block A, a dedicated outdoor terrace (193.1 sqm) provides an attractive elevated environment offering expansive views, fresh air, and opportunities for relaxation, informal study, and social interaction.



Figure 20 - Proposed 4th Floor Roof Terrace Plan

Collectively, the external amenity strategy ensures a diverse range of environments from lively and active recreation areas to calm and contemplative garden spaces supporting the holistic wellbeing of students. The integration of high-quality landscaping, ecological planting, and multifunctional outdoor spaces reinforces the development’s commitment to creating a sustainable, inclusive, and socially connected residential community.



Figure 21 - Proposed Landscape Masterplan

Public Open Space

The proposed development provides approx. 405.5 sqm of high-quality public open space, delivered in the form of a generously proportioned public plaza fronting Fassaugh Avenue. This plaza has been designed as a welcoming civic environment that not only improves the existing streetscape but also strengthens the site's contribution to the wider neighbourhood by offering a new, publicly accessible gathering space.

The public plaza functions as a key interface between the development and the surrounding community, designed to encourage social interaction, provide opportunities for rest and leisure, and enhance pedestrian permeability into the site.

Design features include a variety of seating options are integrated into the plaza design, creating opportunities for informal meeting, rest, and interaction.

The landscape strategy incorporates pollinator-friendly planting schemes, a mix of ornamental flowering trees and specimen trees, ensuring biodiversity gains while providing seasonal colour, texture, and visual interest throughout the year.

The plaza is gently graded to create a natural transition from Fassaugh Avenue into the heart of the site. A steeper central route accommodates vehicular access, while two pedestrian-friendly gradients to the east and west ensure a universally accessible and inclusive approach.

The plaza will feature a commissioned artwork piece, positioned as a focal point within the southern section of the site. This installation will contribute to local placemaking, create a sense of identity, and reinforce the scheme's cultural and community value.

The plaza forms a transition space between the public domain and the private residential environment. A secured gate located within the building undercroft provides controlled access from the plaza to the residents' communal open space beyond, ensuring safety while maintaining permeability.

The creation of this new public open space transforms what is currently a vacant and inactive frontage into a civic focal point. By combining landscaping, biodiversity, high-quality materials, and integrated artwork, the plaza will enhance the visual quality and legibility of Fassaugh Avenue, provide an inclusive and accessible space for both residents and the wider community and contribute to the public realm network of Cabra by offering a new location for social interaction, rest, and cultural engagement.

The proposed public open space creates a distinctive, multifunctional and inclusive civic environment that will benefit both the student population and the wider local community, representing a positive contribution to the public realm of Fassaugh Avenue.

Landscaping

A comprehensive landscape strategy has been prepared, incorporating:

- Native hedgerows and light-canopy tree planting along the eastern boundary to provide screening to adjoining residential properties.
- Biodiverse planting, pollinator-friendly species and ecological features to enhance site biodiversity.
- Public realm improvements including tree planting, seating and high-quality paving within the plaza.
- Private and communal landscaped courtyards for residents.

The landscaping scheme balances ecological sensitivity with the creation of attractive, usable outdoor spaces that contribute to the wellbeing of students and the surrounding community.

Height

Proposals for height are considered to align with the national policy mandate to increase height and densities at appropriate locations. Specifically, the Building Height Guidelines (2018) set out that there is a presumption in favour of buildings of increased height in locations with good public transport accessibility. Blanket numerical limitations on height should be avoided and a set of Development Management Criteria should be applied to test the appropriateness of the heights proposed.

The scheme responds to its context through the provision of a gradual increase in height from the prevailing contextual height to transition to increased development height between 1 to 6 storeys with a stepped approach to create a variety and visual interest and to comply with the cumulative heights strategy. The design modulates building heights to reduce visual bulk, protect residential amenity to the east, and create architectural variety across the scheme.

Building height for Block A varies from 1 to 5 storeys. The overall height of Block A reaches approx. 17.4 m.

Building height for Block B varies from 4 to 6 storeys. The overall height of Block B reaches approx. 20.95 m.

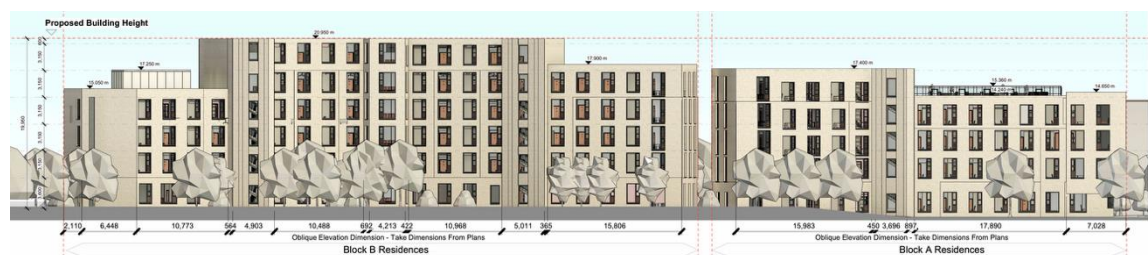


Figure 22 - Proposed Western Elevation

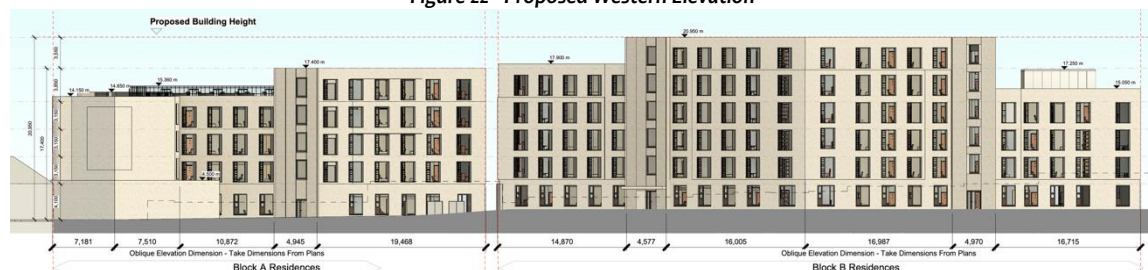


Figure 23 - Proposed Eastern Elevation

Density

The proposed development will result in a net residential density of 122 uph based on the provision of 249 no. bedspaces on an overall net site area of 0.51 ha. We note that the Sustainable Residential Development and Compact Settlements Guidelines, 2024 set out that when calculating net densities for





shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling. The density was calculated on this basis as $249 / 4 = 62.25 / 0.51 = 122$ uph.

A density of this nature is considered appropriate for the subject site and is supported by national policy aiming to deliver compact growth at appropriate urban locations.

Bicycle Parking

The development provides for 308 no. bicycle parking spaces, significantly exceeding Development Plan standards. Provision includes:

- 258 no. resident spaces incl. 12 no. cargo bike spaces
- 50 no. visitor spaces

Cycle parking is conveniently located across the site, with secure covered facilities for residents and accessible short-stay stands for visitors. The quantum and quality of provision supports sustainable travel in line with the National Cycle Design Manual and the GDA Cycle Network Plan.

Car Parking

Given the nature of the development as PBSA in a highly accessible urban location, car parking provision is wholly eliminated in line with national policy. The scheme proposes 1 no. accessible car parking space.

Access

Vehicular access to the site will be via a controlled, gated access point off Fassauga Avenue. This will provide a controlled access for service and delivery vehicles.

This will also be the main access point for both cyclists and pedestrian entering under the gateway of Block A through the gated access.

Operational Management

We refer the Planning Authority to the accompanying Operational Management Plan which specifies details on the management and day to day operations of the proposed development. The plan outlines site security, delivery arrangement, maintenance and waste management as part of six key components:

There are six key components to this Management Plan, namely:

1. On-site management – The site will benefit from a 24/7 management strategy, with dedicated out of hours support and the internal areas of the building and the area surrounding the building will be well maintained and cleaned.
2. Operational Measures – A standard operational process guide will be followed to ensure that the building is maintained to a high standard, and that an excellent service is being delivered.
3. Neighbourhood relations – Relations with neighbours are paramount and an integral part of the Management Plan. Management staff will maintain contact on a regular basis and will be contactable at all times to assist neighbours, if they have issues that they wish the Management Team to address.
4. Code of Behaviour and Conduct – All tenants behaviour will be closely monitored and managed in accordance with the tenancy agreement
5. Transport – transport management of the property and its residents to make a positive contribution to reducing the environmental impacts on the surrounding area.
6. Occupation/Summer letting – During the academic terms all occupiers will be students registered with a third-level institution and the property will be let over the summer months (outside term times) and will continue to be managed by staff in line with the Management Plan.



Occupation / Summer Letting

In line with the Planning and Development (Housing) and Residential Tenancies Act 2016 ‘student accommodation’ is defined as a building used to accommodate students but also includes residential accommodation that is used as tourist or visitor accommodation outside of academic term times.

In line with the definition of student accommodation included in the 2016 Act, during the academic terms all occupiers will be students registered with a third-level institution. Outside of term times it is intended to accommodate student guests and tourist/visitors in the accommodation. This will be subject to the same management and operational procedures to be outlined in the Operational Management Plan at application stage.

Site Services

We refer the Planning Authority to the accompanying Engineering Services Report prepared by Lohan & Donnelly Consulting Engineers for the full details on the proposed water, wastewater and drainage infrastructure connections proposed. A summary is provided herewith:

Water Infrastructure

It is proposed to provide a 150mm MDPE (medium density polyethylene) type PE-80 watermain connecting to the existing manhole at Fassaugh Avenue. The water main will be connected to the plant rooms of each block where the water distribution system is located. Irish Water has confirmed that a water connection is feasible without upgrades.

Wastewater Infrastructure

A 225mm diameter foul water pipe will be provided, commencing from a location along the Easterly boundary of the site, before extending to the last foul water manhole of the site ‘FW01’ located just South of the site beside Fassaugh Avenue, before discharging all the foul water generated from the proposed development into an existing foul water manhole located further South-East down Fassaugh Avenue.

Drainage

The proposed surface water drainage infrastructure for the Proposed Development has been designed and is to be constructed in accordance with “Greater Dublin Strategic Drainage Study (GSDSDS) Regional Drainage Policies Technical Document – Volume 2, New Developments, 2005, “Greater Dublin Regional Code of Practice Works” and the Building Regulation requirements.

It is proposed to provide 225mm diameter surface water pipes to service the Site. Surface water collected from within the site boundary will flow into the last manhole on site “SW01”. From the last manhole on site “SW01” the surface water will flow out into the existing water sewer adjacent to the southern boundary of the Site.

Sustainable Drainage Systems (SuDS)

The Proposed Development will incorporate the design principles of Sustainable Drainage Systems (SuDS). The SuDS elements which were found applicable to the proposed scheme design and layout include the following:

- Extensive Green-Blue Roof – It is proposed to provide a green-blue roof system that covers approximately 1662m² of the roof area of the Proposed Development. The blue roof will act as a roof level attenuation tank which removes the need for an in-ground attenuation tank with the green roof typically installed above the blue roof. Rainwater on the green-blue roof will be absorbed by the vegetation layer. For heavier storm events, when the vegetation layer is no longer capable of retaining any more water, it will then be deposited into a 100mm deep “Bauder attenuation cell 100” and used by the vegetation layer once it has recovered. In heavy 1 in a 100- year storm event, when the water can no longer be held within the vegetation layer or attenuation cells it will discharge into the surface water sewer located at ground level at a controlled rate via flow restrictors.

- Permeable Paving – It is proposed to incorporate a permeable paving system into the paved areas within the Proposed Development, with the aim of reducing run-off from the site in times of precipitation and improving the quality of run-off generally. The quality of run-off from the Site shall also be improved due to the filtering process of the paving, which retains silts and degrades hydrocarbons. In a 1 in 100-year storm event, with 20% increase in storage volume to allow for climate change and total permeable paving area of 1790m², the total required attenuation volume equates to 52.329m³. The total provided attenuation by the permeable paving is 161.09m³.
- Hydrobrake (Site Run-off Control) control will be used to avoid over capacitating the existing surface water sewer. This will be installed adjacent to the 'SW01' manhole on Site, where it will control the flow rate of water. The aforementioned SuDS will also undergo maintenance during the extent of the Operational Phase of the Proposed Development to ensure they continue to function in an optimal and efficient state.

Visual Impact

We refer the Planning Authority to the accompanying Landscape Visual Impact Assessment (LVIA) prepared by Áit Landscape + Urbanism. The LVIA concludes that:

“Twelve photomontages were undertaken to assess the impact of the proposed development on the existing landscape. In terms of landscape character is predominantly suburban, with low landscape value and high capacity for change.

There are a number of views (Views 6,7,8,9) where the visual impact is anticipated to be positive and moderate in the long term where the proposed development will be seen as a positive addition of a new urban edge and the removal of derelict structures and backlands, particularly from public views along Faussagh Avenue. The proposed development will not be visible from the royal Canal Greenway or from Bannow Road (Views 1, 12). It is anticipated that the greatest impacts will be experienced from within the contiguous residential housing estates, where the significance of impact will range from imperceptible, slight and moderate. There will be a varying degree of impacts from private garden amenity spaces to the rear of St Attracta and Bannow Road.”

AA Screening

We refer the Planning Authority to the accompanying AA Screening Report prepared by DNV which concludes that:

“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.”

EIA Screening

We refer the Planning Authority to the accompanying EIA Screening Report and Statement in accordance with Article 103 (1A) of the Planning and Development Regulations 2001, as amended prepared by DNV which both conclude 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).”



7 Strategic Planning Context

It is our considered opinion that the key policy documents for consideration for the proposed development are identified as follows:

- National Planning Framework – Project Ireland 2040
- National Student Accommodation Strategy, 2017
- Regional Spatial & Economic Strategy for the Eastern and Midland Region
- National Sustainable Mobility Policy 2022-2025
- Greater Dublin Region Transport Strategy 2022-2042
- Urban Development and Building Height Guidelines, 2018
- Sustainable Residential Development and Compact Settlements Guidelines, 2024
- Design Guide for State Sponsored Student Accommodation, 2025
- Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025

It is our respectful submission that the proposed development is well-aligned and consistent with the national and regional planning policy documents listed above. We refer the Planning Authority to Appendix I for a detailed review of the proposal's compliance with the strategic planning context.



8 Statutory Planning Context

The Dublin City Development Plan 2022-2028 is the relevant statutory planning context governing the subject site. This Plan will remain valid for 6 years, subject to any review, variations, extensions, or alterations made during the lifetime of the permission.

It is submitted that it is the design team’s full intention for the subject scheme to be in compliance with the site zoning, key development objectives and key development standards.

8.1 Zoning

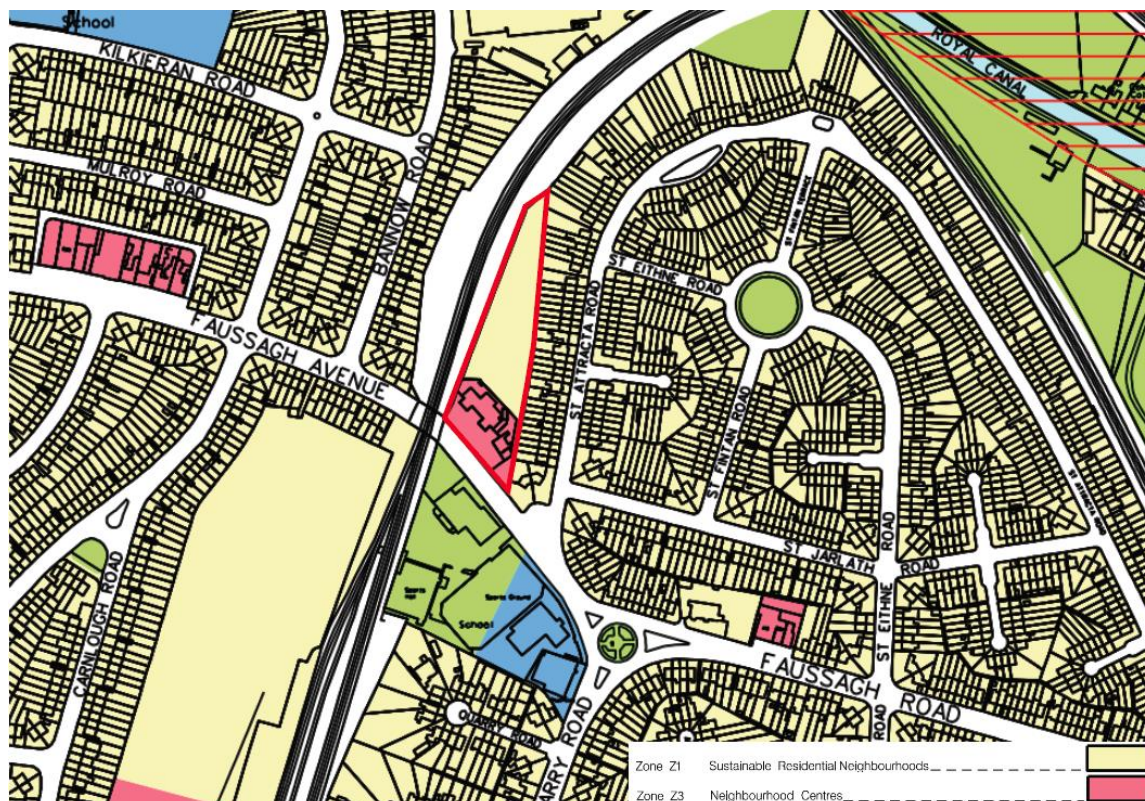


Figure 24 - Extract Zoning Map with Subject Site outlined in Red

The subject site has a split land use zoning objective as per the figure above. The zoning objectives pertaining to the subject site includes ‘Z1: Sustainable Residential Neighbourhoods’, with an objective “to protect, provide and improve residential amenities”. This zoning objective covers the majority of the site and a small section of the southern portion of the site is zoned ‘Z3: Neighbourhood Centres’, with an objective “to provide for and improve neighbourhood facilities.”

The permissible uses and uses open to consideration for the Z1 and Z3 zoning objectives are set out in the following tables.

Zoning Objective Z1: Sustainable Residential Neighbourhoods – “To protect, provide and improve residential amenities”	
Permissible Uses	
Assisted living/retirement home, buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, delicatessen, education, embassy residential, enterprise centre, halting site, home-based economic activity, medical and related consultants, open space, place of public worship, public service installation, residential, shop (local), sports facility and recreational uses, training centre.	
Open for Consideration Uses	

Allotments, beauty/ grooming services, bed and breakfast, betting office, Build to Rent residential, café/tearoom, car park, civic and amenity/recycling centre, garden centre/plant nursery, guesthouse, hostel (tourist), hotel, industry (light), laundromat, live/work units, media-associated uses, mobility hub, off-licence, off-licence (part), office, park and ride facility, petrol station, pigeon loft, postal hotel/motel, primary health care centre, public house, residential institution, restaurant, **student accommodation**, veterinary surgery.

Table 9 - Z1 Zoning Objective Uses

Zoning Objective Z3: Neighbourhood Centres – “To provide for and improve neighbourhood facilities”

Permissible Uses

Assisted living, beauty/ grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, café/tearoom, car park, childcare facility, community facility, craft centre/ craft shop, creative and artistic enterprises and uses, cultural/recreational building and uses, delicatessen, education, enterprise centre, funeral home, garden centre/ plant nursery, guesthouse, home-based economic activity, industry (light), laundromat, live-work units, medical and related consultants, office, off-licence (part), open space, primary health care centre, public service installation, residential, restaurant, shop (local), shop (neighbourhood), sports facility and recreational uses, training centre, veterinary surgery.

Open for Consideration Uses

Advertisement and advertising structures, betting office, civic and amenity/recycling centre, cultural, embassy residential, financial institution, garage (motor repair/service), household fuel depot, internet café/call centre, media-associated uses, off-licence, petrol station, place of public worship, postal hotel/motel, public house, take-away.

Table 10 - Z3 Zoning Objective Uses

Student accommodation use is open for consideration under the subject sites zoning objectives. The planning history pertaining to the subject site has set a precedent wherein student accommodation use was permitted on the subject site. We note to the Planning Authority that the student accommodation use as part of the proposed development has been carefully considered given the subject site’s proximity to third level institutions, public transport accessibility and proximity to services, leisure and recreational facilities.

The proposed development provides for a high-quality purpose built student accommodation development, supported by a high-quality suite of internal and external amenity spaces that will enliven the street frontage, contribute to the public realm, and create a positive interface with the wider neighbourhood.

Under both zoning objectives, student accommodation use is considered an appropriate use:

- Under Z1, student accommodation is listed as “open for consideration” and the planning history on the site has already established a precedent for student accommodation use.
- Under Z3, the emphasis is on active neighbourhood uses and community-serving facilities, which the proposal supports through the provision of public plaza space, landscaped amenity areas, and student support services integrated into the ground floor frontage.

Appropriateness of Student Accommodation at this Location

The proposed 100% student accommodation use is particularly well-suited to this site due to its proximity to third-level institutions. The site is located within easy reach of TU Dublin Grangegorman, Trinity College Dublin (via Luas/DART), and other central third-level institutions, making it highly suitable for purpose-built student accommodation.

The site is within walking distance of the Luas Green Line (Cabra stop), well served by Dublin Bus, and will benefit from future transport infrastructure such as BusConnects and MetroLink. This supports sustainable, low-car living.

The surrounding area already benefits from a strong provision of retail, commercial, and community facilities within the neighbourhood centre and beyond. Introducing additional commercial uses on this site would duplicate existing provision, dilute viability, and risk creating vacant units.

Activation of the Site and Streetscape

While the scheme does not provide commercial floorspace, it compensates by incorporating a carefully designed range of amenity and public realm features that deliver activation and community benefit, including a public plaza (approx. 405.5 sqm) fronting Fassagh Avenue, designed as a civic space with seating, landscaping, and commissioned artwork, accessible to both residents and the wider community. Ground-floor amenity uses (student lounge, reception, and shared spaces) have been positioned to overlook Fassagh Avenue, ensuring passive surveillance and an active edge and the extensive landscaped courtyards and circulation areas contribute to the permeability and vibrancy of the site.

These measures ensure that the development achieves the intent of the Z3 neighbourhood centre zoning, by creating a publicly accessible and animated frontage, while still prioritising the delivery of much-needed student housing.

Rationale Against Additional Commercial Provision

The scheme deliberately avoids including new commercial floorspace as the immediate vicinity of the site already benefits from a sufficient concentration of retail, café, and service uses, consistent with the Z3 neighbourhood centre function. We refer the Planning Authority to the accompanying Social Infrastructure Audit for a detailed review of the retail, café and restaurant services available in the surrounding context.

Market evidence and previous refusals on comparable sites demonstrate that small-scale commercial units in peripheral or over-supplied locations often struggle with viability, leading to long-term vacancy and underutilisation. A commercial offering on this site would therefore be unlikely to succeed, and could undermine the vitality of nearby established businesses.

The proposed development, while delivering a 100% student accommodation use, delivers a balanced response to the site's dual zoning objectives. The scheme provides residential use fully consistent with Z1 objectives while also delivering neighbourhood-serving amenity, activation, and public realm improvements that meet the intent of Z3 without introducing commercially unviable units.

In this context, the proposed student accommodation represents the most appropriate, sustainable, and policy-consistent use of the site, aligning with both the zoning framework and wider strategic objectives to deliver high-quality, purpose-built student housing in accessible urban locations.

8.2 Height

Section 3 and 4 of the Height Strategy (Appendix 3) refers to the strategic approach for height in the city.

From the outset, the Strategy notes that “a 6 storey building in the city centre may not be considered as high, whereas such a proposal in a low density suburb, may be construed differently.”

The Strategy sets out that 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.

The Strategy outlines the following key locations and the indicative height guidance as follow:

City Centre and within the Canal Ring (inner suburbs)	Default position of 6 storeys promoted.
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	Heights greater than 6 storeys to be considered on a case by case basis
Strategic Development Regeneration Areas (SDRA)	As per guiding principles of each specific SDRA
Key Urban Villages	Potential for increased prevailing height
Former Z6 Industrial Lands	4-6 storeys
Public Transport Corridors	Increased height at designated public transport stations
Outer City (Suburbs)	3-4 storeys

Table 11 - Summary of appropriate heights at key locations across the City

The subject site is located within the key location of the “Public Transport Corridors” with access to the local bus network, the Luas, the DART, BusConnects and also future MetroLink and future DART Station in Cabra. There is recognised scope for height intensification and highest densities and height to be promoted at key public transport interchanges, such as the subject site. The Strategy acknowledges that many sites along such transport corridors are smaller infill sites and particular regard must be had to ensure that proposals are of a coherent scale and provide a sustainable and viable extension to the existing urban fabric.

Further, the Strategy states that **“where a development site abuts a lower density development, appropriate transition of scale and separation distances must be provided in order to protect existing amenities.”**

The Strategy sets out that outside of the canal ring, in the suburban areas of the city, in accordance with the guidelines, heights of 3 to 4 storeys will be promoted as the minimum. Greater heights will be considered on a case by case basis, having regard in particular to the prevailing site context and character, physical and social infrastructure capacity, public transport capacity and compliance with all of the performance criteria set out in Table 3. Therefore, a case could be made for increased height at this location given its location within a defined public transport corridor.

The prevailing height is defined by the Strategy as follows:

“This is the most commonly occurring height in any given area. It relates the scale, character and existing pattern of development in an area. Within such areas, there may be amplified height. This is where existing buildings within the streetscape deviate from the prevailing height context, albeit not to a significant extent, such as local pop up features. Such amplified height can provide visual interest, allow for architectural innovation and contribute to a schemes legibility.”

In this case, the subject site at Fassagh Avenue sits directly adjacent to the lower rise (2 storey) residential developments to the West, and as such, the proposed development will be expected to be considerate of this existing context. Further, we note that the Hamilton Gardens SHD has set a precedent for an increased prevailing height of up 8 no. storeys in the immediate area. As such, it is considered that heights of up to 6 storeys on the subject site with an appropriate transition and setback heights is considered appropriate having regard to the prevailing context. We refer the Planning Authority to Appendix I which sets out the proposed developments compliance with the Building Heights Strategy, 2018.

8.3 Density

Section 3 and 4 of the Development Plan’s Height Strategy (appendix 3) set out the requirements for Residential Density. It’s noted that the Plan’s assessment of development of increased height, scale and density in the city aligns with the Section 28 Apartment Guidelines, considering the site is located within a central and/or accessible urban location, which is suitable for higher density development.

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

Table 12 - Density Ranges as per DCC CDP

The subject site is considered to sit within the ‘outer suburbs’ area of the City and as such a density range of 60-120 uph is prescribed by the Development Plan.

The proposed development will result in a net residential density of 122 uph based on the provision of 249 no. bedspaces on an overall net site area of 0.51 ha. We note that the Sustainable Residential Development and Compact Settlements Guidelines, 2024 set out that when calculating net densities for shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling. The density was calculated on this basis as $249 / 4 = 62.25 / 0.51 = 122$ uph.

We refer the Planning Authority to Appendix I for a detailed review of the applicable density range as per the Sustainable Residential Development and Compact Settlements Guidelines, 2024, which is the most appropriate planning context for evaluating density.

A density of this nature is considered appropriate for the subject site and is supported by national policy aiming to deliver compact growth in urban locations.

8.4 Plot Ratio and Site Coverage

The plot ratio of the proposed development is approx. 3.3, while the site coverage is 30%, based on a total net site area of 0.51 ha. While this exceeds the indicative plot ratio range set out for Outer Employment and Residential Areas (1.0–2.5) and is below the indicative site coverage range (45–60%), the design approach represents a balanced and context-sensitive response to the site’s opportunities and constraints.

We note that student accommodation have a greater requirement for gross floor space than any other uses and hence, the slight increase plot ratio than the indicative plot ratio range for Outer Employment and Residential Areas. We consider this an appropriate proposal with significant planning gain.

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%

Table 13 – Indicative plot ratio & site coverage (extract table 2 – DCC Development Plan)

The increased plot ratio is considered appropriate and justified for the following reasons:

- Purpose-built student housing requires a higher proportion of gross floor space relative to site area, due to the inclusion of shared amenity areas, circulation space, and support facilities (e.g., laundry, lounges, postal room, management office). These elements, essential for the proper

functioning and management of the development, result in a higher floor area without translating into excessive site density or overdevelopment.

- The site is an infill brownfield site located along Fassagh Avenue, within walking distance of high-frequency public transport, including the Luas Green Line (Cabra stop) and key bus routes. In line with the Dublin City Development Plan, sites adjoining major public transport corridors are encouraged to deliver higher densities and intensified uses. The proposed plot ratio is therefore consistent with the principles of compact growth and sustainable development.
- The height and massing strategy has been carefully modulated across the site (4–6 storeys) to minimise impacts on adjoining residential properties, while creating an appropriate urban profile and presence on the streetscape. The additional plot ratio is not perceived as excessive bulk, but rather as a well-integrated design solution that balances scale with sensitivity to the surrounding context.
- The planning history of the site has already established the acceptability of student accommodation at this location, and the scheme delivers significant planning gains including new public open space, enhanced landscaping, and a public art contribution.

The proposed site coverage, at 30%, is below the indicative Development Plan range of 45–60% for outer residential areas. This is deliberate and justified by the following:

- A reduced site coverage allows for the delivery of extensive external amenity spaces (approx. 2,971.4 sqm), landscaped courtyards, circulation areas, and a new 405.5 sqm public plaza. This prioritisation of open space creates a healthier, more attractive living environment for students and provides a positive amenity contribution to the wider neighbourhood.
- Lower site coverage ensures that the scheme maintains generous separation distances, optimises daylight penetration, and avoids undue overshadowing or overlooking of adjacent properties. This aligns with the Development Plan objective to protect and improve residential amenities.
- The reduced building footprint facilitates the integration of nature-based SuDS features, soft landscaping, and permeable surfaces, enhancing biodiversity and reducing surface water run-off in line with best-practice climate resilience measures.

The Development Plan acknowledges that higher plot ratios and variations in site coverage may be permitted in certain circumstances, including:

- Sites adjoining major public transport corridors.
- Locations where redevelopment can facilitate urban renewal and intensification.
- Sites requiring an appropriate streetscape profile.
- Where a site has the benefit of a higher plot ratio through previous permissions.

The subject site meets these criteria in full. It is a brownfield, infill site adjoining a public transport corridor, where redevelopment will deliver renewal, enhance the streetscape, and provide significant public realm benefits.

Having regard to the infill nature of the site and the need to create a profile on the streetscape, the proposed plot ratio and site coverage are considered acceptable at this location.

8.5 Demolition

It is proposed to demolish all existing buildings on site. The subject site does not contain any buildings, which are listed on the Record of Protected Structures (RPS) in the 2022-2028 City Development Plan. The principle of demolition of the buildings on site has been accepted in principle having regard to the planning history pertaining to the subject site and the fact that the subject site is listed on the Vacant Buildings Register.

In compliance with Section 15.7.1 of the Development Plan, we refer the Planning Authority to the accompanying Demolition Justification Report prepared by Lohan & Donnelly Consulting Engineers for further information in this regard.

8.6 Student Accommodation

Section 15.13 of the Development Plan states that the City Council supports the provision of high-quality, professionally managed, purpose built third-level student accommodation, either on campus or in accessible locations adjacent to quality public transport corridors and cycle routes, in a manner which respects the residential amenities of the locality.

Unit Size / Layout

Section 15.13.1.1 of the City Development Plan states that 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 bedroom’s unit. The cluster model shall provide minimum bedroom sizes as follows:

Bedroom Type	Bedroom size (min)	Bedroom size including en-suite (min)
Single study	8 sqm	12 sqm
Twin study	15 sqm	18 sqm
Disabled study	-	15 sqm

Table 14 - Minimum bedroom sizes for student accommodation clusters

It is noted that the floor areas of the proposed single bedrooms proposed exceed the requirements outlined above. We refer the Planning Authority to the accompanying Housing Quality Assessment prepared by Reddy Architecture for further details in this regard.

Communal Facilities

Section 15.13.1.3 of the City Development Plan states that communal facilities and services which serve the needs of students shall be provided both internally and externally within a scheme.

The Development Plan requires the provision of communal requirements for student clusters as follows:

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

Table 15 - Communal Requirements for Student Accommodation Clusters

The current proposal provides 13.3 sqm of amenity area per bed space, which equates to a total provision of 3,318.5 sqm of amenity space for students to avail of, which comprise of the following spaces:

Type	Location	Area
Laundry Room	Ground Floor	19.3 sqm
Postal Room	Ground Floor	21.2 sqm

Reception / Office / Kitchen Tea Room & Communal Open Space	Ground Floor	120.9 sqm
Student Lounge	First Floor	185.7 sqm
Roof Terrace	Fourth Floor	193.1 sqm
External Amenity	Surface Level	2778.3 sqm
Total		3,318.5 sqm

Table 16 - Amenity Space Provision

8.7 Car / Bicycle Parking

Section 15.13.1.4 of the City Development Plan states that designated car parking will not be supported in student accommodation schemes in the city. We note that no designated car parking is proposed for the future students occupying the proposed development. 1 no. accessible car parking space is proposed as part of the development.

A minimum of one cycle parking space per bedroom should be provided within the development as well as additional visitor parking at a rate of 1 per 5 no. bedrooms.

Standard	Requirement	Provision
Resident (1 per bedspace)	249	258
Visitor (1 per 5 bedrooms)	$239 / 5 = 47.8$	50
Total	297	308

Table 17 - Bicycle Parking Requirement vs Provision

It is noted that a total of 308 no. bicycle parking spaces (resident and visitor) have been provided at surface level exceeding the required 297 no. bicycle parking spaces. In addition, it is noted that a total of 12 no. cargo bike spaces are proposed equating to 5% of the resident bicycle parking space provision.

8.8 Landscape and Public Open Space

The Development Plan sets out that the public open space requirement for residential development shall be 10% of the overall site area as public open space (5,113 sqm by 10% = 511.3 sqm).

The proposal provides 405.5 sqm of public open space and 2,971.4 sqm of communal outdoor open space.

We note that Section 15.8.7 of the Development Plan sets out that 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. 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. As such, the minor under provision of public open space can be dealt with by way of financial contribution through the attachment of an appropriate condition.

Further, it is noted that the Guidelines on Residential Developments for 3rd Level Students (Section 50 Finance Act 1999) allows for an area of open space to not be provided:

“Where not located on campus, adequate open space should be provided within developments for the amenity of students. Where the limitations of sites do not allow for small parks or gardens, alternative provisions should be incorporated in developments through a combination of terraced open space/roof gardens, and/or balconies with good landscaping where appropriate.”



For full details on the nature and design of communal and public open space, we refer the Planning Authority to the Landscape Design booklet prepared by Áit Urbansim + Landscape.

All considered, the proposed development is consistent with the policies and objectives of the Dublin City Development Plan 2022-2028.



9 Conclusion

We invite the Planning Authority to positively consider the proposal now put forward in the application documents attached herewith. We note the following key summary points:

- The subject site is located at 2A Fassagh Avenue, Dublin 7, D07 TH77. The site itself is a vacant plot in a well-connected location in the Cabra area. The site currently occupies the former ‘Matt’s of Cabra’, now derelict, 1-2 storey structures fronting onto Fassagh Avenue.
- The subject site is well-located in terms of public transport accessibility. The closest bus stop is located directly opposite the subject site and another bus stop sits approx. 100 m / 1-minute walk from the subject site. Both stops are served by the no. 120 Dublin Bus route. The site will also benefit from its proximity to the BusConnects network with several spine / branch routes serviced in the vicinity. The subject site is proximate to the Green Luas line. The closest stop being Cabra Luas stop located approx. 750 m / 10-minute walk from the subject site. The subject site sits approx. 1.2 km / 16-minute walk from the Broombridge Train Station.
- The subject site is in close proximity to local services and amenities in the wider Cabra area. There are 36 no. third level colleges, universities and institutions within a 5 km radius of the subject site. The subject site is well connected to third level educational facilities with several institutions being within convenient walking / cycling distance and others are well connected by public transport. The subject site’s city location benefits from a range of social infrastructure, including civic, cultural, community, healthcare, recreational facilities and educational services in the surrounding area.
- The proposed development consists of 249 no. student accommodation bedspaces in 32 no. clusters including 13 no. accessible units and 10 no. studio units arranged in 2 no. blocks ranging in height from 1-6 storeys with associated internal and external amenity spaces, a public plaza, 308 no. bicycle parking spaces and 1 no. accessible car parking space.
- The scheme delivers a comprehensive range of internal and external amenity spaces to provide students with a high standard of living and recreational facilities.
- The proposed development provides approx. 405.5 sqm of high-quality public open space, delivered in the form of a generously proportioned public plaza fronting Fassagh Avenue. This plaza has been designed as a welcoming civic environment that not only improves the existing streetscape but also strengthens the site’s contribution to the wider neighbourhood by offering a new, publicly accessible gathering space.
- This site offers a significant opportunity for the delivery of purpose-built student accommodation and offers an alternative typology within the area. The proposal is appropriate to the site and sympathetic to its history and current use. It is appropriate to the site, the surrounding area and is well founded in planning terms. The applicant is committed to working with the Planning Authority to deliver on a suitable proposal at this site and we trust that any matters that may require further consideration will be addressed during the development management process.

From review of the proposed LRD scheme, we can confirm that the proposal is in accordance with relevant statutory documents governing the site and that there is an appropriate planning context to support the subject proposal. We note specifically that this LRD proposal has had specific regard to new policy, objectives and standards for student accommodation developments, height and density and we are of the considered view that the current proposal is consistent with the provisions of the Dublin City Council Development Plan 2022-2028.

The proposed development has been progressed based on careful consideration of the assessment of existing third-level colleges/universities within the vicinity of the site. The scheme provides compact form on this prime infill site, comprising a well-designed and quality student accommodation development to meet the severe deficit in Dublin currently.

All considered, the current proposal represents a significant development opportunity for the immediate locality in that it delivers a suitable scheme on zoned and serviced lands, which caters to students. This accords with the national policy mandate for the delivery of housing and services for students, whilst providing much needed hotel accommodation at an appropriate location within Dublin’s City Centre.

10 Appendix I – Strategic Planning Context & S28 Ministerial Guidance

10.1 National Planning Framework – Project Ireland 2040

Project Ireland 2040

National Planning Framework First Revision

April 2025

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The NPF was originally published in 2018, and replaced the National Spatial Strategy as the overall spatial planning and development strategy for Ireland. Planning legislation provides for the Government to revise or replace the NPF every six years. Following a decision of Government in June 2023, the preparation of a revised National Planning Framework commenced, with a draft revision being displayed in July 2024. Based on feedback from the consultation, an updated version of the draft revised NPF was then published in November 2024.

Following such, on the 8th of April 2025, the Government approved the Revised National Planning Framework which, subject to the approval of both Houses of the Oireachtas, signals the conclusion of the NPF revision process, which has been underway since June 2023 and is detailed below.

The NPF has been updated to address evolving challenges and needs, including population growth, housing demands, infrastructure requirements, and climate change for example.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building stronger regions – accessible centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated compact, smart and sustainable growth.

The key high - level objectives of the Plan are:

- To continue a path of economic prosperity, environmental sustainability, and climate action across all regions to compete international and be drivers of national and regional growth.
- To ensure that Irelands many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodate and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

Overall, the Framework caters for:

- The extra one million people that will be living in Ireland by 2040.
- The need for approximately 50,000 additional households per annum to 2040.
- The demand for additional school places, special education provision, and third-level education places.

The following policies are considered key in the context of this site:

National Policy Objective 3 –

Southern Region: approximately 330,000 additional people over 2022 levels (c. 450,000 additional people over 2016-2040) i.e. a population of just over 2 million.



National Policy Objective 4 –

A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

National Policy Objective 7 –

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

National Policy Objective 8 –

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 and ensure compact and sequential patterns of growth.

National Policy Objective 14 –

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.

National Policy Objective 16 –

To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

National Policy Objective 20 –

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 22 –

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

National Policy Objective 42 –

To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.

National Policy Objective 43 –

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 44 –

Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

National Policy Objective 45 –

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, increased building height and more compact forms of development.

It is submitted that the current proposal for 249 no. student bedspaces including 13 no. accessible units and 10 no. studio units in 2 no. blocks ranging in height from 1-6 storeys will deliver on the above objectives of the NPF.



10.2 National Student Accommodation Strategy (2017)



The National Student Accommodation Strategy was published in May 2017 and the purpose of this Strategy is to ensure that there is an increase in the level of supply of purpose built student accommodation to reduce the demand for accommodation in the private rental sector both by domestic and international students attending Higher Education Institutions (HEIs).

A key target of the Strategy was the construction of at least an additional 21,000 PBSA bed spaces by 2024 over the baseline figure of 33,441 PBSA bed spaces which are currently available.

It is key to emphasise the following extract from Section 2 of the Strategy:

“Housing for students is a specific and important segment of the overall housing sector with distinct characteristics and requirements. This has a significant related impact on the private rental sector and an increase in the provision of student accommodation is a key priority in addressing the housing crisis. There are a significant number of students renting from private landlords in Ireland as was highlighted in the National Economic and Social Council (NESC) Report “Ireland’s Rental Sector: Pathways to Secure Occupancy and Affordable Supply”³ which was published in May 2015. The NESC report also outlined that on average, there are 2.73 persons per household in Ireland. While it is likely that the occupancy of a household comprising solely of students is going to be higher than the national average, it is a fair extrapolation to make that every 4 students housed in either PBSA or in Digs will free up an additional housing unit in the private rented sector that would otherwise have been occupied by students. The impact of an additional 21,000 student accommodation bed spaces, in addition to an additional 1,500 Digs spaces, will free up at least an additional 5,000 rental units for the wider residential rental sector.”

The Strategy sets out concerns regarding facilitating rental levels of residential property generally and states that:

“The most effective way to reduce and stabilise rents in the long term is to increase supply and accelerate delivery of all types of housing. The aim of this strategy is to support the accelerated availability and delivery of student accommodation including both digs and PBSA, which should in turn lead to a stabilisation of the cost of accommodation”.

The Report highlighted that in 2017, there was 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.

“As highlighted already, in Dublin in particular, all HEIs are reporting that their current provision is heavily over-subscribed and students are finding it difficult to secure accommodation on or near their campuses. The des will continue to work with stakeholders to ensure support for the further development of PBSA both by HEIs and private developers.”

The proposed development will provide 249 no. student bed spaces and will help to reduce demand on the private rental section aligned with the principles and objectives of the National Student Accommodation Strategy, 2017.

10.3 Delivering Homes Building Communities 2025-2030

Delivering Homes, Building Communities 2025-2030

An Action Plan on Housing Supply and Targeting Homelessness

The Action Plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 2 pillar approach as follows:

- Pillar 1 – Activating Supply
 - Activating Land, Delivery Infrastructure
 - Facilitating Investment, Addressing Viability
 - Increasing Skills, Adopting Modern Methods of Construction.
 - Securing Additional Supply
- Pillar 2 – Supporting People
 - Focusing on Ending Homelessness, Delivering Homes for Older People, Supporting Social Inclusion

Section 7.7 of the Plan shows commitment to the long-term student accommodation strategy by increasing the supply of student accommodation in line with demand. It aims to increase the supply of student specific accommodation, reducing reliance on the private rental market and increasing housing availability for private individuals and families.

The Action Plan sets out that the *Student Accommodation Strategy 2025-2035* will be published shortly and will set out Ireland's national policy to support access to appropriate housing for full-time undergraduate and post-graduate students. The Strategy's objective is to increase the supply of new student accommodation beds through two pillars – supply and viability measures and to provide targeted affordability supports for priority groups identified under the National Access Plan.

The Strategy aims to address student housing needs that support access to higher education and reflects the policy commitment to grow supply without any additional resource to the private rental market. The Action Plan aims to ensure that housing is not a barrier to education.

As such, the proposed development at Fassaugh Avenue for 249 no. student bedspaces will help to achieve the aims of the Delivering Homes Building Communities, 2025-2030 – An Action Plan on Housing Supply and Targeting Homelessness, at an accessible location.

10.4 Regional Spatial & Economic Strategy for the Eastern and Midland Region



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being located in the ‘Dublin City and Suburbs’ and is part of the Dublin Metropolitan Area.

The Dublin Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12–20-year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration

“RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines and Urban Development and Building Heights Guidelines for Planning Authorities.’”

*“RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on **the consolidation of Dublin and suburbs**, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”*

Aside from the above core policy objectives, it is clear that the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the

role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities.

In terms of consolidation and re-intensification, the following policy objective is noted:

Consolidation and Re-Intensification

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

We submit that the proposal complies with the RSES as it will deliver the appropriate residential density of 122 units per ha having regard to the ‘Sustainable Residential Development and Compact Settlements Guidelines, 2024’, ‘Urban Development and Building Heights Guidelines for Planning Authorities, 2018’ and ‘Dublin City Development Plan 2022-2028’. The proposal site is ideally placed to provide the consolidation of Dublin City and suburbs with adequate supporting infrastructure to support the intensification of this vacant, infill and brownfield site.

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density at 122 units per ha and has had regard specifically to standards as set out in the ‘Sustainable Urban Housing - Design Standards for New Apartments Guidelines for Planning Authorities (2023)’ and ‘Urban Development and Building Heights Guidelines for Planning Authorities (2018)’ in ascertaining an appropriate residential density, height, and car parking provision for the site.
- The current proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density along a key public transport corridor.
- The proposal utilises a vacant, prime City Centre site. The delivery of residential development at this location is considered appropriate to this urban, built up area of Dublin City Centre.

We submit that the proposed development is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

10.5 National Sustainable Mobility Policy 2022-2025

National Sustainable Mobility Policy



The National Sustainable Mobility Policy sets out a strategic framework to 2030 for active travel and public transport to support Ireland’s overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade. The Policy builds on and replaces existing active travel and public transport policy as set out in the 2009 policy documents - Smarter Travel: A Sustainable Transport Future and the National Cycle Policy Framework.

The overarching target of the Policy is to deliver at least 500,000 additional daily active travel and public transport journeys and a 10% reduction in kilometres driven by fossil fuelled cars by 2030 in line with metrics for transport set out in the Climate Action Plan 2021.

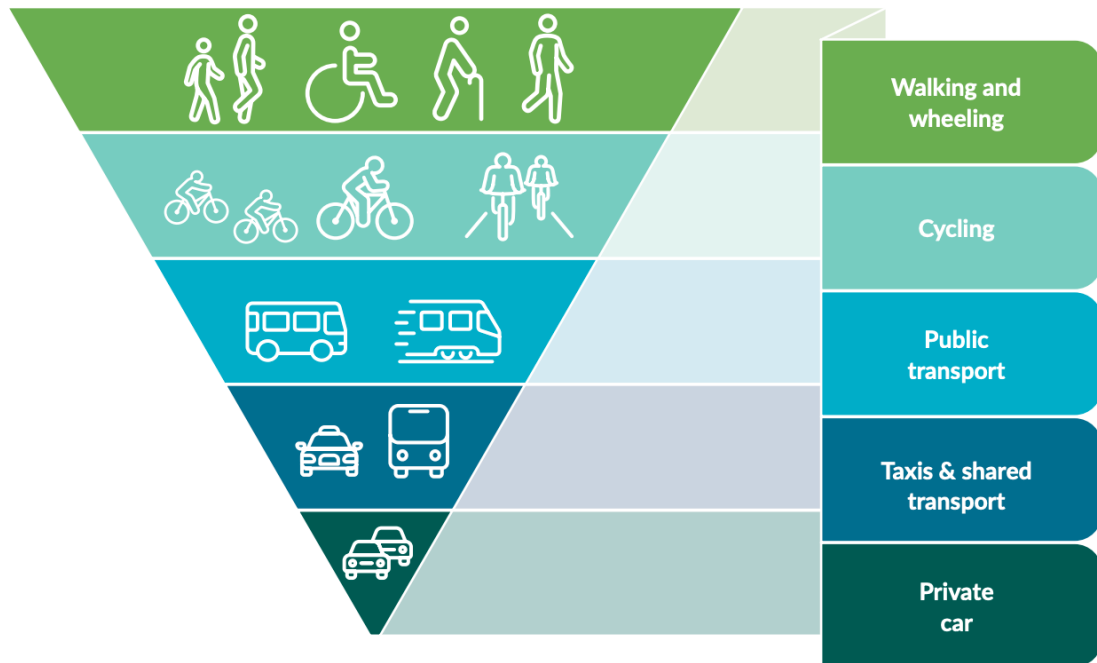


Figure 25 - Hierarchy of Road Users

The Policy advocates for the internationally recognised ‘pedestrian first’ Hierarchy of Road Users model to encourage more sustainable travel patterns and safer streets. This model recognises that by prioritising design for pedestrians first, the number of short journeys taken by car can be reduced and public transport made more accessible.

The proposed development will encourage future staff, guests and residents to choose sustainable mobility over the private car. No car parking is proposed as part of the subject scheme. The subject site is in close, walking distance to a wide variety of services, facilities, amenities and attractions and it is considered that the vast majority of staff, guests and residents will be walking / wheeling to and from the subject site. In addition, an appropriate level of bicycle parking, in excess or in compliance with the Dublin City Development Plan 2022-2028 standards are proposed coupled with the presence of cycle lanes in the vicinity of the site promotes cycling as an attractive transport option. Further, the subject site is exceptionally well located in terms of public transport accessibility and as such, the proposed development is well-placed to promoted sustainable transport options in line with the National Sustainable Mobility Policy 2022-2025.

We submit that the proposal is consistent with the National Sustainable Mobility Policy 2022-2025.

10.6 Greater Dublin Area Transport Strategy 2022-2042



The National Transport Authority released The Transport Strategy for The Greater Dublin Area 2022 – 2042 which replaces the previous framework of The Transport Strategy for the Greater Dublin Area 2016 – 2035. This Strategy outlines the framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA).

10.6.1 Walking, Accessibility and Public Realm

The Transport Strategy sets out that walking is an important mode of travel, accounting for 18% of trips to work and education in the GDA in 2016. We note the following relevant objective:

Measure WALK2 – Improved Footpaths

“The NTA, in conjunction with local authorities, will implement footpath improvement schemes across the GDA where required throughout the period of the Transport Strategy in order to ensure that they are of sufficient width, adequately lit, serve both sides of the road in urban areas (in most cases), are of good quality surfacing, provide for seating at appropriate locations, and are free of unnecessary clutter.

Footpaths will also be maintained and improved in a manner which contributes positively to the public realm.”

The proposed development is surrounded by high quality pedestrian footpaths in the city centre and it is considered that a large amount of trips to and from the site will be made on foot.

10.6.2 Cycling

The Transport Strategy for The Greater Dublin Area 2022-2042 details the objectives regarding cycling within the GDA. Chancery Street is not recognised within this document, however multiple routes have been identified within proximity of the site. O’Connell Street and the Liffey quays have been recognised as a primary orbital route. We note the following relevant objectives:

Measure CYC1 – GDA Cycle Network

“It is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.”

Measure CYC3 – Extended Hours of Operation of Cycle Infrastructure

“The NTA and local authorities will extend the operations of cycle infrastructure. For fully-segregated cycle tracks they will all operate on a 24-hour basis. For on-road cycle lanes, they will generally also operate on a 24-hour basis, other than in exceptional circumstances where such provision is not practicable.”

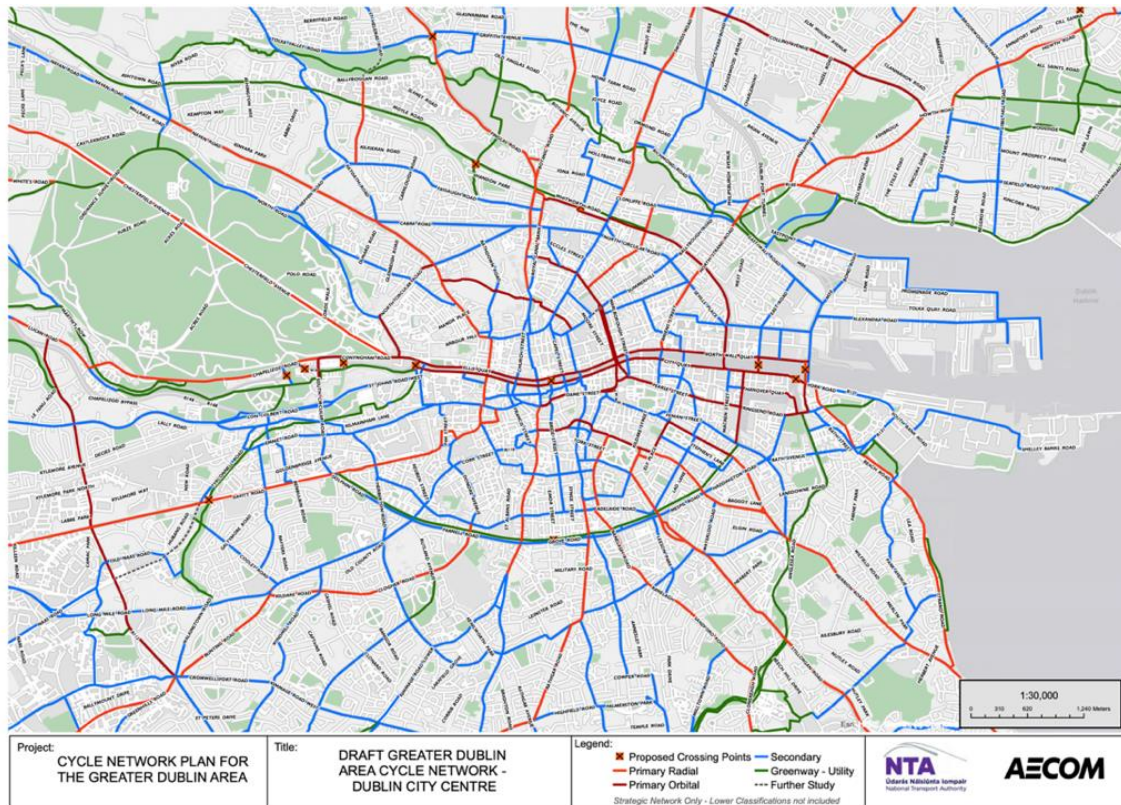


Figure 26 - Proposed Dublin Cycle Network

10.6.3 Bus

The Transport Strategy details the objectives regarding bus services within the GDA. The Strategy notes that, in recent years the NTA has begun a process of implementing a step-change in the quality of the overall bus system in the GDA, through the following programmes:

- BusConnects Dublin;
- Connecting Ireland; and
- Local Link.

Over the period of the strategy, the NTA will implement bus priority additional to that proposed under the current BusConnects Dublin programme. In particular, as demand for bus travel increases and the need for reliable journey times increases, the requirement for further priority on radial corridors will emerge. This may involve extending the current Core Bus Corridors or the identification of new radial corridors which may require priority.

In the later phases of the Transport Strategy period, it is the intention of the NTA to introduce higher capacity bus vehicles onto select appropriate BusConnects corridors in order to increase passenger carrying capabilities in line with forecast demand.



Figure 27 - BusConnects Dublin Core Bus Corridors



Figure 28 - BusConnects Orbital Bus Corridors

10.6.4 Light Rail

The Strategy details the objectives regarding light rail services within the GDA. The Strategy notes that since the inclusion of a light rail network in the Dublin Transport Initiative Strategy in 1994, the reintroduction of tram services into Dublin has been a major element of successive plans and investment programmes for the regional transport system.

The subject site is situated in proximity to the Luas Green Line, and will benefit from the proposed expansion of the Luas network. These proposed expansions of the Luas line as well as the proposed Metrolink to Dublin Airport can be seen in the figure below. The desired Luas network post-2042 can also be seen below.

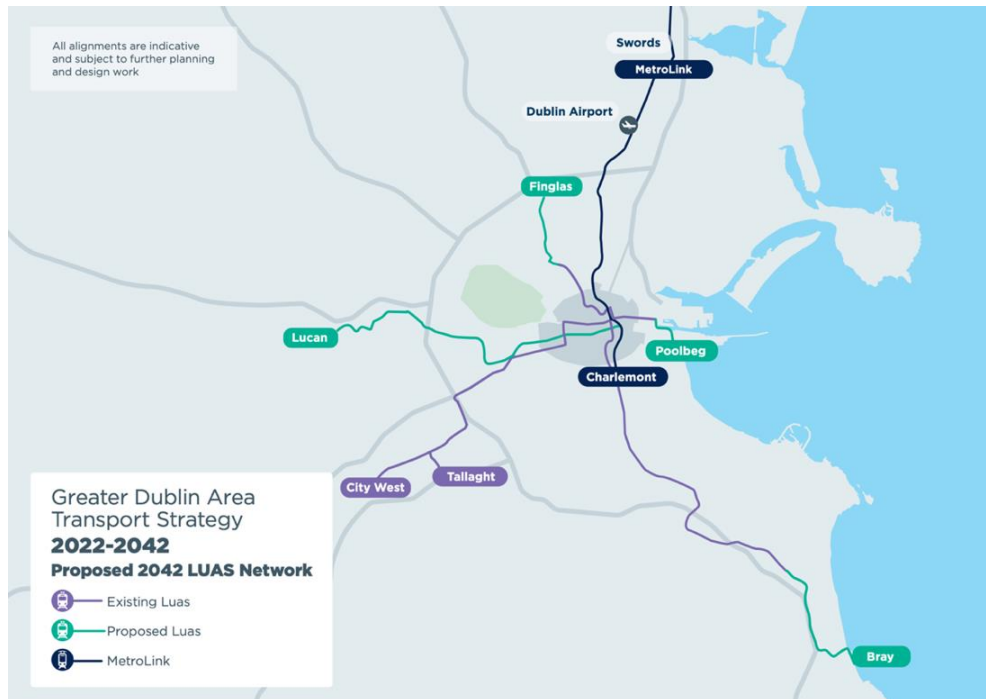


Figure 29 - Proposed 2042 Luas Network

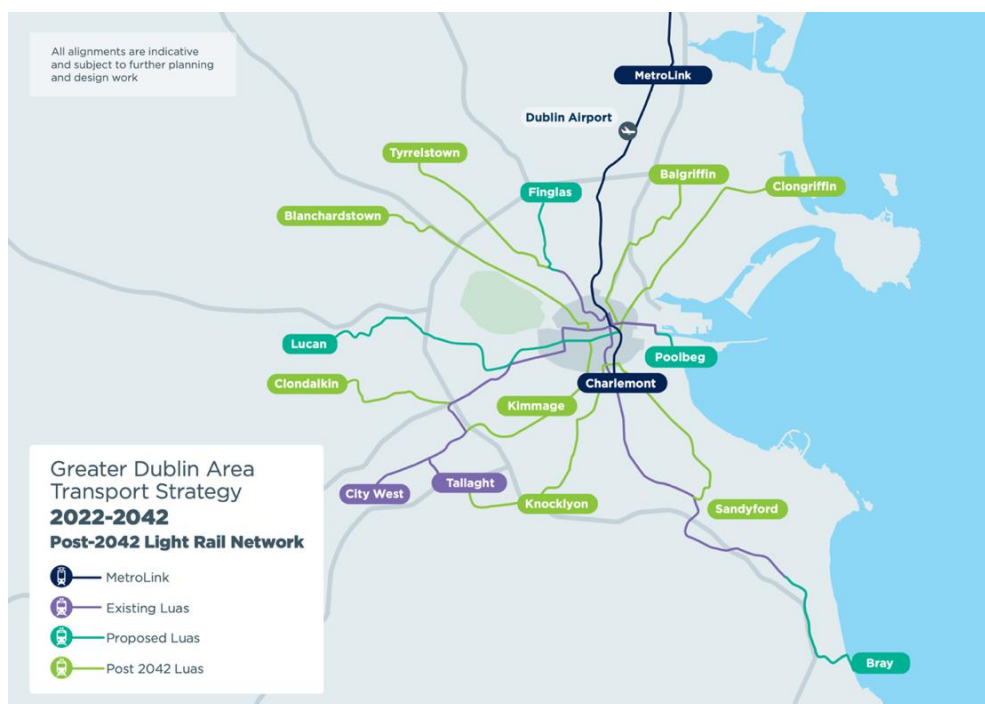


Figure 30 - Proposed Luas Network Post-2042

10.6.5 DART+ and Rail

The Transport Strategy anticipates that the heavy rail lines will play an increasingly important role in the GDA transport system. A number of new train stations and service extensions are proposed in the Strategy as per the figures below.

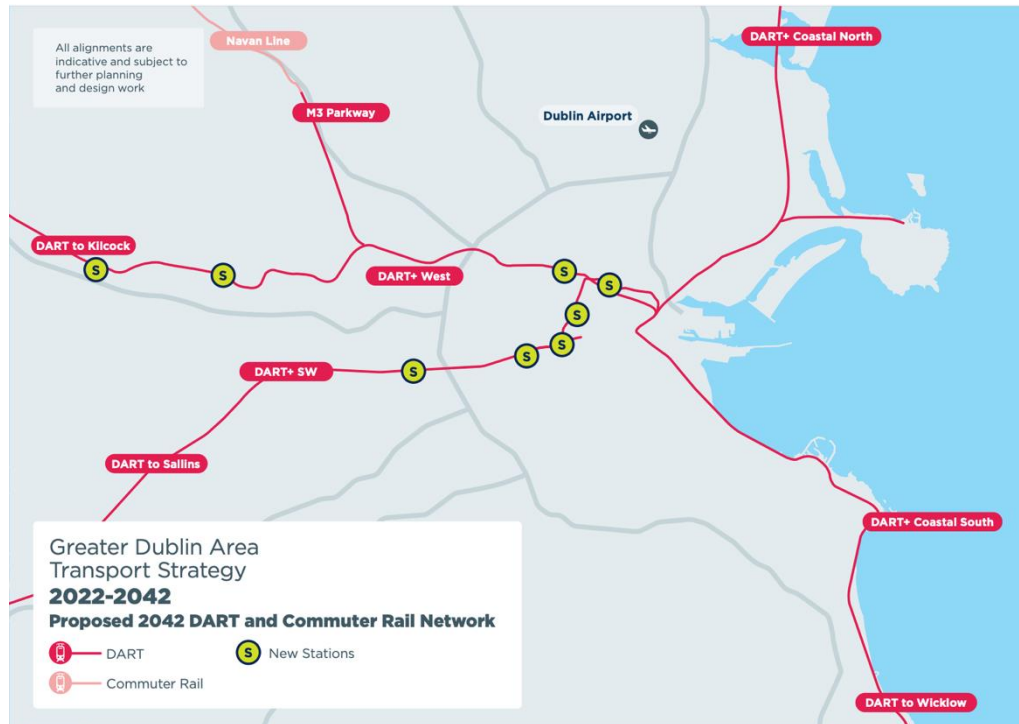


Figure 31 - Proposed Dart and Commuter Rail Network 2022-2042



Figure 32 - Proposed Combined Rail Network Post 2042

10.6.6 Phasing

It is the intention of the NTA to deliver the Transport Strategy in accordance with the high-level phasing shown in the figure below.

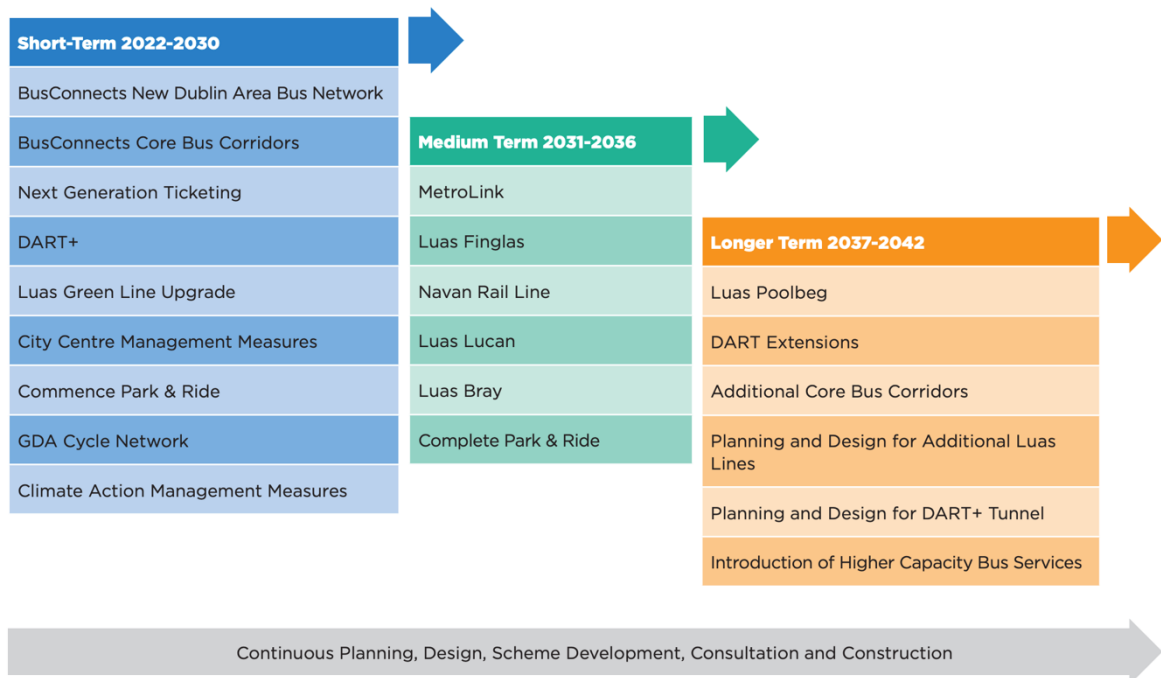


Figure 33 - Strategy Phasing

From the above, it is evident that the subject site is ideally placed to benefit from both existing transport infrastructure and planned / proposed transport infrastructure.

10.7 Urban Development & Building Height Guidelines, 2018

Urban Development and Building Heights

Guidelines for Planning Authorities

December 2018

The publication of the ‘**Urban Development and Building Heights, Guidelines for Planning Authorities (2018)**’ is intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. We note that section 1.14 of the document sets out the following:

*“Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.”*

The Urban Development and Building Height Guidelines are the predominant context for assessment of height in this case.

From the outset, it is noted that the Building Height Guidelines (2018) expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

“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.”

Specific Planning Policy Requirements

The following Specific Planning Policy Requirements are considered particularly relevant to the current site context and the compliance of the scheme with these SPPRs is set out below.

SPPR 3 (A)

“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.”

Applicant Response to SPPR 3A

The performance of the proposal vis-à-vis the building height criteria is further assessed below in sub-section ‘Development Management Criteria’.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority that the proposed development satisfies criteria. The relevant criteria, followed by an applicant response is set out below to clearly set out for the Planning Authority to demonstrate that the current proposal respects the outlined Development Management Criteria.

The applicant acknowledges that Appendix 3 Table 3 of the Dublin City Development Plan also sets out a list of performance based criteria which the applicant has considered as part of this planning application. It is understood that those criteria are the prevailing context for the assessment of height in this case. The detail response offered below is considered to further support the context for height at this site.

At the scale of the relevant city / town	
Assessment Criteria	Response
“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The site is exceptionally well served by high capacity and frequent public transport services. The closest bus stop (located approx. 100 m away from the subject site) comprises a quality bus corridor which is serviced by a number of high-capacity, high-frequency bus routes. Several other bus stops in the immediate vicinity of the site offering connection to Dublin City Centre and other employment, educational and recreational amenities and services. The site is also located 750 m from the Luas green line stop at Cabra and has connections with the Luas green line stop. The Luas frequency is dependent on peak and off peak times. We note that trams operate at a 3-5 minute frequency during peak hours of operation (Monday – Friday 7 am – 10 am and 4 pm – 7 pm) and a 12-15 minute frequency during off peak hours. The subject site is also located 1.5km away from a proposed Metrolink stop at Glasnevin.

Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	The proposal is not located within an architecturally sensitive area. The subject site does not contain or adjoin any Protected Structures and is not located within an Architectural Conservation Area. However, careful consideration has been given to the successful integration of the scheme into the existing character and topography of the site and area. The proposal will result in a positive contribution to the character and urban fabric of this area in terms of landscape character and quality due to both the low sensitivity, quality and nature of the existing site and the proposed revitalisation and new architectural character of the proposed building. Having regard to the site topography, its location, cultural context, surrounding key landmarks and the protection of key views, we refer the Planning Authority to the accompanying Landscape Visual Impact Assessment (LVIA) prepared by Áit Landscape + Urbanism. The LVIA concludes that: <i>“Twelve photomontages were undertaken to assess the impact of the proposed development on the existing landscape. In terms of landscape character is predominantly suburban, with low landscape value and high capacity for change.</i> <i>There are a number of views (Views 6,7,8,9) where the visual impact is anticipated to be positive and moderate in the long term where the proposed development will be seen as a positive addition of a new urban edge and the removal of derelict structures and backlands, particularly from public views along Faussagh Avenue. The proposed development will not be visible from the royal Canal Greenway or from Bannow Road (Views 1, 12). It is anticipated that the greatest impacts will be experienced from within the contiguous residential housing estates, where the significance of impact will range from imperceptible, slight and moderate. There will be a varying degree of impacts from private garden amenity spaces to the rear of St Attracta and Bannow Road.”</i>
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.”	The proposed development will complete a portion of the entire block and create an active and attractive frontage which is more appealing for pedestrians than the current environment of vacant land. The proposed development would not reduce the visual amenity of the surrounding area.

	Careful consideration has been given to the existing surrounding area and appropriate set back distances have been maintained to not reduce the level of amenity experienced by surrounding buildings. A mix of uses, unit types and heights are provided across the development site offering a variety in scale and form while also providing an appropriate density for the site given its location and scale.
At the scale of district/ neighbourhood/ street	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposal responds to the natural and built environment in an appropriate manner. Careful consideration has been given to the proposal regarding how it addresses the surrounding area with particular attention given to the streetscape and similar surrounding development. As discussed above, the proposed development will complete a portion of the urban block at Fassagh Avenue and will provide an attractive and active street frontage making a positive contribution to the streetscape. The development aims to deliver a student accommodation development catering to the demand for new units as outlined in national policy documents on a currently underutilised site.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	Careful consideration has been given to ensure that a monolithic appearance is avoided. Different materials, and fenestration as well as changes in massing across the site will break up the uniform appearance of the site and create visual interest.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).	There is no inland waterways or marine frontages within the current proposal. We refer the Planning Authority to the accompanying Flood Risk Assessment prepared by Lohan & Donnelly Consulting Engineers which confirms that <i>“the risk of flooding for the development is minimal and within the acceptable limits.”</i>
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The proposed development integrates into this urban area in a cohesive manner. The site constraints does not allow for the provision of internal pathways through the site however, the proposed development will create an appealing environment for pedestrians at this location. The building’s frontage has been designed to be visually engaging and accessible, with clearly defined

	entrances and a layout that naturally encourages pedestrian flow. This attention to street-level interaction enhances connectivity with neighbouring buildings and public spaces, ensuring that the development is well-integrated into the existing urban network.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”	The proposed development provides for an appropriate mix of unit types and sizes will be incorporated into the proposed development. The mix of 32 no. clusters of 4, 7, 8, 9 and 10-bedroom units provides variety and options within a single development of future residents. The addition of 13 no. accessible units and 10 no. studio units also helps provide options for future residents. These units have been thoughtfully designed to cater to the needs of students, offering comfortable, high-quality living spaces in a vibrant area of the city.
At the scale of the site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	The proposed development has been meticulously designed to balance urban density with a sensitive approach to its surroundings, ensuring minimal disruption to neighbouring properties while maximising the benefits for future occupants. The height and massing of the building have been carefully modulated to align with both the urban context and best practice standards for daylight access and overshadowing. The form of the building has been specifically designed to maximise access to natural daylight and ventilation for both the proposed residential units and the surrounding properties. Generous setbacks, articulation in the facade, and carefully positioned window openings ensure that natural light can penetrate deeply into the building, reducing the reliance on artificial lighting and enhancing the comfort and well-being of residents. The development has been designed in line with best practices and guidelines, ensuring that it contributes positively to the urban fabric while respecting the amenities of neighbouring properties. We are confident that the proposed scheme will provide a high-quality living environment for its occupants and a thoughtful addition to this part of the city.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS	We confirm that a Daylight and Sunlight Assessment has been completed by 3D Design Bureau and accompanies this submission. We note that the proposed student accommodation meet or exceed the appropriate target values in the summer and winter time calculations for spatial daylight autonomy. In addition, the student

8206-2: 2008 – ‘Lighting for Buildings - Part 2: Code of Practice for Daylighting’. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	accommodation meets / exceeds the criteria for sunlight exposure.
Site Specific Assessment	
Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	A Wind & Microclimate Study was prepared by OCSC as part of design development. This Study concluded that: <i>“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 1.8m high balustrade on the 4th floor terrace, 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.</i> <i>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 and there is no proposed seating in those areas.</i> <i>Overall, the proposed development may be classified as a high-quality, comfortable environment for occupants throughout the year.”</i>
In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	A Bat survey has been completed by DNV and is detailed in the accompanying Preliminary Ecological Appraisal Report. The following recommendation is detailed in the PEA:

	<i>“The Site has low potential for commuting and/or foraging bats, implying that local bat populations could use the Site.</i> <i>During the Construction Phase of the Proposed Development, no night working should occur. Furthermore, the lighting plan accompanying this report (OCSC 2025) has embedded mitigation in the design for the Operational Phase.”</i>
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links	We refer the Planning Authority to the accompanying Telecommunications Impact Assessment prepared by ISM.
An assessment that the proposal maintains safe air navigation.	Given the development is removed from any airports or air strips this report is not required. Equally, as the subject building is not considered to be of significant height (not significantly higher than the local context) this assessment is not considered required in this instance.
An urban design statement including, as appropriate, impact on the historic built environment	There are no Protected Structures onsite, and the site is not located within an Architectural Conservation Area. The development proposes no potential impact on any nearby protected structures.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	We confirm that an Appropriate Assessment Screening Report, Preliminary Ecological Appraisal Report and EIA Screening Report prepared by DNV accompany this planning application.

Table 18 - Development Management Criteria

In consideration of above, the current proposal for 249 no. student bedspaces at a student accommodation development can be positively considered on this site by the competent authority. Specifically, the proposal has addressed the specific development criteria requirements of the Guidelines and is in compliance with the key SPPRs. Most notably the site’s location is considered to address the very spirit and intent of the Guidelines that being one proximate to public transport and a variety of services.

We submit that the proposed development is consistent with the Urban Development and Building Height Guidelines for Planning Authorities (2018).

10.8 Sustainable Residential Development and Compact Settlements Guidelines, 2024

The *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)* set out policy and guidance in relation to the planning and development of urban and rural settlements with a focus on residential development and the creation of compact sustainable settlements.

These Guidelines replace the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* published in 2009 and provide updated guidance to take account of current policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth.

Given the NPF priorities for compact growth and reflecting the variety of settlements and settlement contexts where residential development takes place. The Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines to ensure that densities are efficient while, at the same time, tailored to the settlement context.

10.8.1 Areas and Density Range

Section 3.3 of the Guidelines identifies settlements, area types and density ranges for cities and metropolitan (MASP) areas. It is noted that the strategy for all cities is to support consolidation and intensification within and close to the existing built-up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport.

The following sets out the key development parameters, as they relate to the site at Fassagh Avenue:

POLICY AND OBJECTIVE 3.1 (AREAS & DENSITY RANGES)

Policy and Objective 3.1 *“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.”*

Policy Objective 3.1. of the Guidelines adopts a 2-step approach to density, that being Step 1 - the application of an appropriate range followed by Step 2 - a requirement to refine the density in terms of site's accessibility and considerations in relation to local character amenity and the natural environment.

Step 1

Table 3.1 of the Guidelines clearly set out density ranges for Dublin City and Suburbs. The ranges are broken down into City Centre; City Urban Neighbourhoods; City Suburban/Urban Extension. In terms of categorisation, it is considered that the subject site would be most akin to the 'City – Urban Neighbourhoods' category, which is defined as follows:

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

As such, it is a policy and objective of the Guidelines that densities in the range of 50 – 250 dph (net) shall generally be applied at urban neighbourhood locations.

Step 2

Section 3.4 of the 2024 Guidelines relates to refining density which must consider **site accessibility** and considerations in relation to **local character, amenity and the natural environment**.

The density range for the subject site 50 – 250 dph shall then be further considered and refined based on the consideration of centrality and accessibility to services and public transport; and consideration of character, amenity and the natural environment.

Consideration of Public Transport Accessibility:

- **Urban Bus:** The subject site is located in close proximity to high-frequency urban bus stops. There are several bus stops in the immediate vicinity of the site offering connections to Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area. There is a bus stop (No. 4485) located directly across from the subject site. There is another bus stop (no. 4371) located 255 m from the subject site on Drumcliffe Drive.

- **BusConnects:** The subject site is located approx. 1 km from the Navan Road Bus Stop No. 4498 which is serviced by BusConnects route N2 which runs at a frequency of 15 minutes. The subject site will be in proximity to the B Spine / Branch Route, Peak Time Routes, Local Routes, Orbital Routes and Other City Bound Routes as they BusConnects scheme continues to roll out. Further, we note that the Navan Road approx. 1 km from the subject site is a Core Bus Corridor.
- **Luas:** The subject site sits approx. 750 m / 10-minute walk from the Cabra Luas stop which is serviced by the Green Luas line between Broombridge and Brides Glen. The peak time frequency of the Luas is 4-6 mins.
- **DART:** The site is also located approx. 1.2km (16-minute walking distance) from the Broombridge Train Station. This station is serviced by InterCity and Commuter Trains with destinations to Connolly Station, Dun Laoghaire, Grand Canal Dock, Sligo, M3 Parkway, Longford and Maynooth.
- **Proposed MetroLink:** The subject site currently sits approx. 1.5 km from the planned Glasnevin Metro stop.

From the locational advantages set out above, the subject site is considered to be an ‘accessible’ location defined as “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.” As such, densities within the mid to high range would be considered to be appropriate for the subject site.

Consideration of Character, Amenity and the Natural Environment:

- a) **Evaluation on Local Character:** In respect of the character of the area, the surrounding built form is divergent, not uniform or distinct and therefore will have the ability to adjust to change. The range of uses is reflected in the diversity of the surrounding buildings’ dates, styles, heights, and densities. The proposed development will complement and contribute to the diversity of the area’s character.
- b) **Historic Environment:** In respect of the historic environment, while the structures and dwellings on Saint Attractas Road and Fassagh Avenue are older housing stock, there are no protected structures, architectural conservation areas or archaeological monuments at or in the vicinity of the subject site. The receiving environment is not a historically sensitive environment.
- c) **Impact on the Environment:** In respect of the natural environment, the site is comprised of grasslands and scrub. Matters relating to the environment and protected habitats shall be appropriately addressed through the LRD process
- d) **Impact on Amenities of Residential Properties:** The proposed development is mindful of its impact on amenities of local residential properties in close proximity through modulation of heights, careful placement of windows and maintains appropriate separation distances.
- e) **Water & Wastewater Network Impacts:** We refer the Planning Authority to the accompanying CoF received from Uisce Eireann wherein it is considered that there should be sufficient capacity in the local network in terms of water and wastewater to cater for this development.

Given the divergent character of the area; the fact that the receiving environment is not historically sensitive; that the proposed development does not overly impact on amenities of residential properties and there is sufficient infrastructure capacity in the area, it is considered that the area surrounding the subject site can absorb a higher-density development.

The proposed development will result in a gross residential density of 122 dph (based on 62.25 no. units i.e. 249 / 4 over 0.51 ha site area). We note that Section 3.2.1 of the Guidelines states that “when calculating net densities for shared accommodation, such as student housing, **four bed spaces shall be the equivalent of one dwelling.**”

The proposed residential density of 122 dph sits comfortably within the mid-range of the 50–250 dph density band

In determining the appropriateness of the proposed density, regard has been had to the surrounding development pattern, which is typified by a variety of building types, heights, and land uses, with no

singular architectural or historic character that would limit the potential for sensitive intensification. The development has been designed in a manner that respects the amenity of adjoining properties, avoids undue visual or environmental impact, and responds to the surrounding context through thoughtful massing, articulation and orientation.

Given the strong level of accessibility, the absence of constraints related to protected structures or environmental sensitivity, and the site's ability to absorb a higher density development without detriment to local residential amenity or infrastructure capacity, it is considered that the proposed density represents a balanced and sustainable approach to urban intensification. It aligns with national planning policy objectives aimed at promoting compact growth and the efficient use of serviced urban land, while also contributing positively to the delivery of diverse and high-quality housing typologies within the city.

10.8.2 Separation Distances (SPPR 1)

"It is a specific planning policy requirement of these Guidelines that statutory development plans¹⁵ shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms¹⁶ at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces..."

It is submitted that minimum separation distances of 16 m are followed and exceeded as part of the proposed development and the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

10.8.3 Public Open Space

Policy and Objective 5.1 – Public Open Space

"It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site."

The subject site is constrained in size to locate any useable and functional public open space on the subject site. It is requested that the Planning Authority attach a condition for a contribution in lieu of the provision in accordance with the above policy and the City Development Plan.

10.8.4 Car Parking (SPPR 3)

“It is a specific planning policy requirement of these Guidelines that: (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.”

It is proposed that this scheme will not include car parking facilities for either staff, guests, or residents. This is deemed appropriate as the site is located within the City Centre proximate to a wide variety of services, amenities, employment areas, tourist attractions, existing and planned public transport modes where as per SPPR3, car parking provision should be substantially reduced or **wholly eliminated**.

10.8.5 Bicycle Parking and Storage (SPPR 4)

“It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

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

The proposed development includes a secure and covered bicycle stores at surface level.

The development provides for 308 no. bicycle parking spaces, significantly exceeding Development Plan standards. Provision includes:

- 258 no. residential spaces incl. 12 no. cargo bike spaces
- 50 no. visitor spaces

Cycle parking is conveniently located across the site, with secure covered facilities for residents and accessible short-stay stands for visitors. The quantum and quality of provision supports sustainable travel in line with the National Cycle Design Manual and the GDA Cycle Network Plan.

We submit that the current proposal is compliant with the Sustainable Residential Development and Compact Settlements Guidelines, 2024.

10.9 Design Guide for State Sponsored Student Accommodation, 2025

Design Guide for State Sponsored Student Accommodation

Version 1.0 - May 2025

The "Design Guide for State Sponsored Student Accommodation" (Version 1.0, May 2025) outlines the Irish Government's new approach to developing student accommodation. It focuses on standardised, cost-effective, sustainable, and inclusive design, particularly for state-sponsored on-campus housing.

In early 2024, the Government approved a long-term student accommodation policy that will see the State investing directly in student accommodation for the first time. The purpose of the new Student Accommodation Strategy is to ensure that the availability and rental cost of student accommodation no longer act as barriers to accessing or progressing through third-level education. By addressing these challenges, the aim is to create an equitable environment where students, regardless of their background, can fully benefit from the opportunities provided by higher education.

The Student Accommodation Standardised Design Study was undertaken to draft new design standards for state-sponsored on-campus student accommodation. Its objective was to establish best practice and value for money for the State ensuring additional supply for students, while enabling the delivery of modern facilities that are functional, sustainable, maintainable, flexible, and safe, with high quality architectural design.

Adherence to these standards is not mandatory for the purposes of the assessment of planning applications under the Planning and Development Acts however, it is envisaged that elements of this guide may form part of future updates to Section 28 guidelines under the Planning and Development Act 2000 or a National Planning Statement under the Planning and Development Act 2024.

The Guide sets out minimum space and design standards and it is confirmed that the proposed development exceeds the minimum space standards.

10.9.1 Space and Design Standards

Minimum Bedroom Standards

Room Type	Minimum Size	Minimum Width	Minimum Storage
Single (shared bathroom)	8 sqm	2.1 m	0.7 m ³ storage, 600 mm min. hanging rail, 3 linear m of shelving
Single with ensuite	11.5 sqm	2.1 m	0.7 m ³ storage, 600 mm min. hanging rail, 3 linear m of shelving
Double (single occupancy) with shared bathroom	9 sqm	2.4 m	0.7 m ³ storage, 600 mm min. hanging rail, 3 linear m of shelving
Double (single occupancy) with ensuite	14 sqm	2.4 m	0.7 m ³ storage, 600 mm min. hanging rail, 3 linear m of shelving
Twin with ensuite	19 sqm	3.35 m	0.7 m ³ storage, 600 mm min. hanging rail, 3 linear m of shelving per person
Accessible Single with ensuite	22 sqm	3.9 m	0.7 m ³ storage, 600 mm min. hanging rail, 3 linear m of shelving

Minimum Bathroom Standards

Bathroom Type	Minimum Size
Standard Shared Bathroom	2.8 sqm
Shared Bathroom with Large Shower	3.7 sqm
Jack & Jill Bathrooms	4.5 sqm

Ensuite Bathroom	1.8 sqm
Accessible Bathroom	6.8 sqm

Shared Kitchen / Living / Dining Spaces

Cluster Size	Minimum Overall Size	Minimum Size per person
4 person	22 sqm	5.5 sqm
6 person	27 sqm	4.5 sqm
8 person	32 sqm	4 sqm
10 person	36 sqm	3.6 sqm
12 person	40 sqm	3.3 sqm
Accessible 8 person	34 sqm	4.3 sqm

We confirm that the proposed development complies with an exceeds the minimum space standards. We refer the Planning Authority to the accompanying Housing Quality Assessment prepared by Reddy Architecture for further detail in this regard.

Cluster Types

Clusters can mix room types (single, twin, double) with or without ensuite bathrooms.

Summer Lettings

Where summer lettings are in place and student accommodation is used for tourists outside of term time, there will be a requirement to consider storage spaces for linen, crockery etc.

We submit that the preliminary proposal is consistent with the Design Guide for State Sponsored Student Accommodation.

10.10 Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025

Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025



The Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025 (the “Apartment Guidelines”) were published on the 8th of July 2025, replacing the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023.

The Apartment Guidelines are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

The current proposal provides for 249 no. student bedspaces and this Planning Report sets out the compliance of the proposal with the key policy requirements and standards as they relate to the proposed apartment units within the scheme as follows:

Student Accommodation

Section 5.2 of the Apartment Guidelines specifically refers to purpose-built student accommodation an the Design Guide for State Sponsored Student Accommodation (as outlined above).

The Apartment Guidelines note that while adherence to the Design Guide is not a mandatory policy requirement, specific standards set out in the Design Guide are identified as being of particular importance from the perspective of providing appropriate flexibility for these typologies to be applied within the planning system.



Specifically, the Design Guide allows for the provision of single study bedrooms without the requirement for an en-suite bathroom, with a minimum required area of 8 sq.m for a single study bedroom and a minimum required area of 11.5 sq.m for a study bedroom incorporating an en-suite bathroom.

Accordingly, the following is a requirement of the Apartment Guidelines:

Specific Planning Policy Requirement 8

(A) (i) *There shall be no requirement or restriction in relation to the provision of en-suite bathrooms for single study bedrooms within Purpose Built Student Accommodation schemes.*

(ii) *The minimum required area for a single study bedroom without en-suite facilities is 8 sq.m and the minimum required area for a single study bedroom with en-suite facilities is 11.5 sq.m; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR.*

(iii) *The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons are 3.6 sq.m and 3.3 sq.m per person, respectively; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR.*

(B) *Where any other requirement or restriction is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single student accommodation scheme.*

We confirm that the proposed development meets and exceeds the minimum standards set out in SPPR 8.

We submit that the proposed development is consistent with the Apartment Guidelines.

