Planning Application Report & Statement of Consistency

Proposed Amendments to Permitted SHD Reg. Ref. ABP-311411-21

Lands at Baker's Corner,
Rochestown Avenue and Kill Avenue,
Dún Laoghaire,
A96 TD77

On behalf of

Baker Forge Properties Ltd.

March 2026

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1 CONTEXT: RATIONALE FOR THIS PLANNING APPLICATION

In this first instance, we refer the Planning Authority to the parent permission on the application lands registered under ABP Ref. 311411-21 wherein a grant was issued in January 2022 for a Strategic Housing Development for student accommodation consisting of 276 no. bedspaces with associated facilities, a public house, 2 no. commercial units and ESB Substation.



Figure 1 – Permitted built form and architecture of Baker's Corner Development Scheme

Subsequent to this grant of permission, it became evident by the design team in finalising construction and tender drawings that there were a number of inefficiencies apparent in the design and layout of the building blocks permitted that rendered the permitted design sub-optimal in terms of operator and user requirements. The Applicant is now looking to rectify these, and as such, is seeking to apply for an amendment application to the parent permission. Material upgrades to the treatment of the building elevations are also proposed.

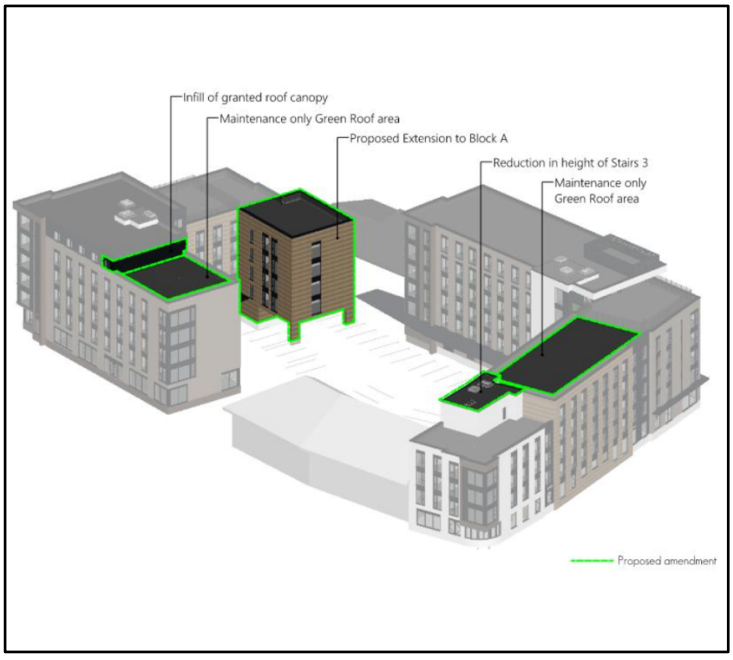


Figure 2 – Key Amendment Propsoals

Alongside this, since the original grant of planning permission in 2022, there has been a significant uplift in the level of demand for student accommodation across the city, due to the ongoing housing crisis, and concurrently a need for a greater degree of housing typologies within the market generally. We refer the Planning Authority to Irish Times (17/02/26) which stated that '*there was a deficit of at least 38,900 student bed spaces in Dublin, Cork, Limerick and Galway at the end of 2025 according to an analysis of the sector by Sherry Fitzgerald….this shortfall increases to 53,000 if a shorter commutable distance for students attend third level in Dublin is assumed'.* It is within this context that the subject amendment planning application is being made to Dun Laoghaire Rathdown County Council.

We therefore are proposing a modest increase to the student numbers to reflect an optimal number for an intended operator and to respond to the requirements for additional accommodation. This is set out in detail below.

The proposed increased in student accommodation units within the already permitted development is a direct response to the clear uplift in demand for this type of housing. Delivering an increased number of purpose-built units will ensure that more students have access to safe and well-managed living accommodation – simultaneously reducing pressure on the wider housing market in the area. This proposal also aligns with planning policy objectives in this regard, supporting the local economy and responding to community and residential market needs.

Beyond the parameters of market demand, the proposed increase in the number of units on site greatly increases the long-term viability of this development to end-use operators. Larger schemes such as that now proposed brings tangible economies of scale and enables better management, and amenity provision that appeals to professional operators in this sector.

By delivering a critical mass of units, this amendment application will not only secure the scheme's significance in this market but will also ensure its sustainability, commercial viability and contribution to the Development Plan objectives for the area.

2 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin are instructed by our client **Baker Forge Properties Limited, 22 Windsor Place**, **Dublin 2** to prepare this Planning Report regarding relating to minor alterations to the permitted SHD Development ABP Ref. 311411-21 on lands now know as **Baker's Hall (formerly Baker's Corner), Rochestown Avenue and Kill Avenue, Dun Laoghaire, Co. Dublin, A96 TD77.**

This report is intended to specify the rationale behind the subject proposal; to identify consistency and compliance with the relevant national planning policy guidelines under Section 28 of the Planning and Development Act (as amended), and with local statutory planning policy in the form of the Dún Laoghaire-Rathdown County Development Plan 2022-2028.

The overall proposal relates to minor alterations to the permitted SHD Development ABP Ref. 311411-21 to include an additional 24 no. student accommodation units, as well as providing minor changes to the permitted form of the development blocks.

The approved development relates to a strategic housing development for student accommodation comprising 276 no. bedspaces with associated facilities, a public house, 3 no. commercial units and ESB Substation.

We wish to highlight from the outset, that our client is committed to working with the Planning Authority to deliver on a development that is appropriate to the site and the surrounding context. The Planning Authority is aware of the Applicant's commitment to delivering a high-quality mixed-use student accommodation development as evidenced through the parent permission and now subsequent amendment application through associated pre-planning discussions.

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

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.

3 SITE LOCATION & CONTEXT

The subject site is located at the junction of Kill Avenue and Rochestown Avenue in Dún Laoghaire and is identified in the figure below for the purposes of this report. The building housing the former Bakers Corner Public House and Off License is positioned at the corner of the junction of Rochestown Avenue and Kill Avenue. The site has frontage onto Rochestown Avenue to the west and Kill Avenue to the north and is bounded to the south by the former Kill-O-The Grange Garda Station and to the west by the grounds of the Holy Family Church.

The site has an area of approx. 4,830 sqm (or 0.483 ha) and is broadly rectangular in shape and generally comprises a car parking lot that served the commercial buildings fronting Kill Avenue and Rochestown Avenue and the former two-storey pub and off-licence (Bakers Corner Public House).



Figure 2 – Aerial Map with Subject Site outlined in Red

In terms of surrounding residential developments, the area is generally characterised by two storey houses. The site is bound to the north by Kill Lane and to the West by Rochestown Avenue. Holy Family Church is located to the east of the subject site with former Garda Station and residential development to the south.

3.1 Surrounding Context

The figure below identifies the subject site outlined in red. The surrounding area is a mix of residential, neighbourhood centre, educational campus, and business park. To the east of the subject site is the Holy Family Parish Church and Community Centre with associated car parking and to the south is an area of open space and the former Garda station. The Ashbury Nursing Home, across Rochestown Avenue contains one of two nearby protected structures. The wider vicinity is largely characterised by residential development of 2 storey semi-detached and terraced housing, with the Institute of Art, Design and Technology a 4-minute walk. Overall, the surrounding area is characterised by a wide mix of uses, building typologies, scale and architecture.

The existing buildings immediately adjacent the site includes:

- Holy Family Church with associated parking (c. 26m to the east)
- A single storey community hall associated with the neighbouring church (c.8.6m to the north of Building B)
- A three-storey building (referred to as The Forge)
- Existing right of way which is undefined after 28m from Rochestown Avenue (delineated by the orange arrow)
- Adjacent open amenity space
- Neighbouring vacant Garda Station (c. 13m to the south)
- Ashbury Nursing Home (20+m to the west)
- Casement Villas (40+m to the north)



Figure 3 – Site Context

3.2 Proximity to Local Facilities and Amenities

The site is conveniently located within walking distance of a wide range of local facilities and amenities to support the students. The below figure illustrates the close proximity of the site to a range of supermarkets, health care facilities (i.e., hospitals, medical centres, pharmacies), gyms/sports clubs, post offices, further education institutes and other community facilities (i.e., libraries, places of worships, community centres). The site is in walking distance of the Dun Laoghaire Institute of Art Design + Technology campus which also houses the Blackrock Education Centre. Deansgrange commercial centre is less than 5 minutes' walk from the subject site, offering facilities such as supermarkets, library, medical centre, pharmacy, post office and other shops and services.

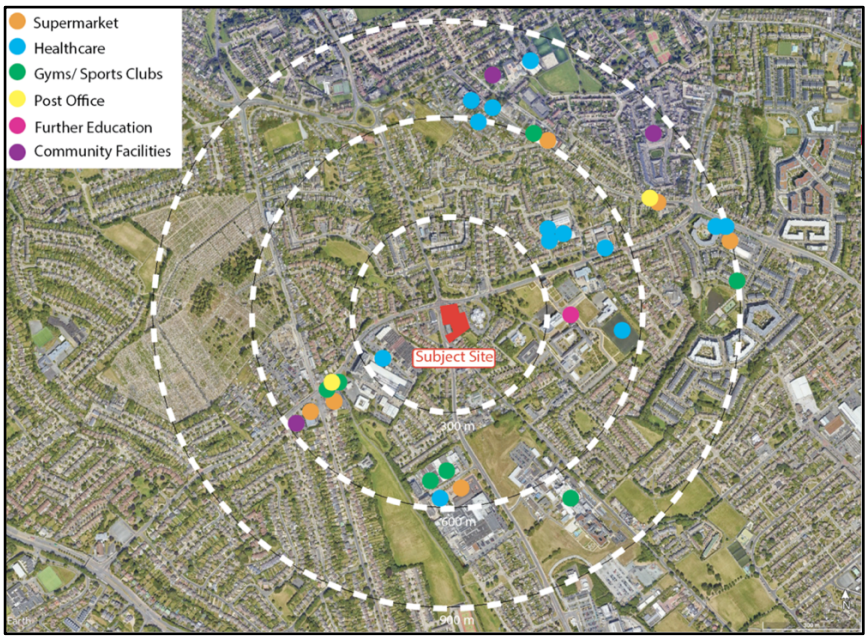


Figure 4 – Aerial Map of Surrounding Area

3.3 Public Transport Infrastructure

The site is located in close proximity to a number of public transport services, including both bus and Dart routes as discussed below.



Figure 5 – Public Transport with Subject Site outlined in Red

Bus Services

Directly outside the subject site on the northern boundary there is a bus stop (Stop ID: 4570 – Holy Family Church), which is served by Dublin Bus Service No. E2. This route is part of the BusConnects network redesign, providing a key north-south spine service. It is noted that the No. E2 operates during peak hours – approximately every 7, 10, 15 and 25 minutes. The No. E2 route is also a 24-hour bus route that runs from Harristown Depot to Dún Laoghaire and back approximately every hour after 11.30 pm

until 4.30 am. There is another bus stop to the north of junction the site along Abbey Road (Stop ID: 2023 - 90 metres), which is served by the following Dublin Bus and Go-Ahead Services:

- 7B – runs between Mountjoy Square and Shankill, serving key locations such as Donnybrook, Stillorgan, and the city centre including Leeson Street and O'Connell Street, with variations depending on the direction and time of day. It is noted that there is no service operation on either Saturday or Sunday,
- 7D – runs between Dalkey Village and Mountjoy Square, passing through areas such as Donnybrook and UCD Belfield. It serves as a crucial link for residents and commuters in these southern suburbs and the city centre. Services are typically Monday to Friday, with no Saturday or Sunday service.
- L27 – runs between Leopardstown Valley and Dún Laoghaire Station, serving key locations such as Carrickmines and Pottery Road for example – approximately every 30 minutes.

Further to the southeast of the site along Deansgrange Road, there is the L26 Go-Ahead bus route (8-minute walk – 600 metres), which runs approximately every 30 minutes connecting Kilternan Village with Blackrock Station, serving areas including Cornelscourt, Carrickmines, and Deansgrange. This route functions as a local service under the BusConnects network redesign and provides service from the early morning to late night.

Other bus routes available (within a 15-minute walk from the site) include:-

- E1 – frequent bus route connecting Northwood in Santry to Ballywaltrim via the city centre. This new E-spine route runs through areas such as Ballymun, DCU, Parnell Square, O'Connell Street, Donnybrook, and Bray approximately every 4, 8, 10, and 20 minutes during the daytime. The E1 also provides a crucial 24/7 public transport link, especially for accessing key locations such as universities, colleges and hospitals, supporting the night-time economy (every hour after 11.30 pm until 4.30 am).
- X1 – peak-time limited-stop service that connects Kilcoole, Greystones, and the city centre via a spine route through Bray, Stillorgan and Donnybrook
- X2 – peak-time service serving the areas of Newcastle, Kilcoole, and Greystone in County Wicklow, connecting them to the city centre at Hawkins Street, via Brides Glen Luas and Clonkeen Road.

In addition, the site is in close proximity to the BusConnects Quality Bus / Bus Priority Routes:

- E2 (Northwood – Ballywaltrim)
- B4 (Blanchardstown Shopping Centre – Sallynoggin)
- L26 (Blackrock - Kiltiernan)
- L27 (Dún Laoghaire – Leopardstown Valley)
- P11 / P12 (Dalkey – Townsend Street)

The subject site is located within 50 m from the Spine / Branch Route E on Kill Avenue and within 50 m of Spine / Branch Route B on Rochestown Avenue.



Figure 6 – BusConnects Map with Subject Site identified by Yellow Star

DART Service

The Dart train also provides frequent services northbound to Malahide and Howth (via the City Centre) and southbound to Bray and Greystones. The nearest DART stations are Salthill & Monkstown and Dún Laoghaire, which are approx. 2.5 km and 3 km from the site respectively. Bus services in close proximity to the site provide connections to these DART stations, i.e. L27 & L26. etc.

Cycling and Walking

The local cycle facilities within DLR currently consist of Radial and Orbital Cycle Routes, which span most of the county. The radial routes mainly service north-south movements, while the orbital routes service east-west movements. In addition, there is existing dedicated cycle infrastructure along Kill Avenue and Rochestown Avenue. Further improvements to this infrastructure are located at the Baker's corner junction, which involve the Dún Laoghaire Central Active Travel Scheme. This involves installing segregated cycle tracks and new footpaths, improving the public realm, and providing new landscaping and sustainable drainage. Key features include the operational CYCLOPS (Cycle Optimised Protected Signals_ junction, upgrades to pedestrian crossings, and improved bus priority on Kill Avenue. This project is designed to enhance connectivity for pedestrians and cyclists, linking to other routes within the country.

4 PLANNING HISTORY

A brief synopsis of the planning history pertaining to the site subject and relevant planning history of adjoining sites is set out below.

4.1 Subject Site

Baker's Corner SHD Student Accommodation – Subject of Amendment Application

Reg. Ref. ABP-311411-21 – Granted 26 January 2022

Permission was sought by Baker Forge Properties Ltd. on the 16th of September 2021 for a strategic housing development for student accommodation to provide for 276 no. bedspaces with associated facilities, a public house, 2no. commercial units and ESB Substation located at 0.483ha lands at Baker's Corner, Rochestown Avenue and Kill Avenue, Dun Laoghaire, Co. Dublin, A96TD77.

The development will include the following:

- Demolition of existing Bakers Corner Public House approximately 1,378sqm Construction of a replacement public house of approximately 292.4sqm at the Kill Avenue Frontage with adjoining ESB substation (14.4sqm) and switch room (7sqm) Construction of a student accommodation development with an overall gross floor area of approx. 8,677 sqm (internal) in two blocks of 5 to 6 storeys (Bakers Corner Building – Building A) and 4 to 6 storeys (Main Student Accommodation Building – Building B).
- The development will provide for a total of 276 student bed spaces grouped into 38 no. clusters of six, seven and eight bedrooms with associated kitchen/dining/living areas Ancillary student support facilities are also proposed at ground floor level of the main student accommodation building (Building B), including: a common room/reception (169.2sqm), management office (16.2sqm), administration space (21.3sqm), Post/Comms area (15.4sqm) meeting room (41.6 sqm), store (18.6 sqm), canteen (22.5 sqm), Toilets and Shower Room (38.9 sqm), laundry (27.3 sqm), cinema room (43 sqm), gym (28.3 sqm), and break out space (45 sqm); and at fifth floor level 2no. communal lounges (27.5 sqm and 46.8 sqm(including Kitchenette)); totalling approx. 843.1 sqm. New Public/Urban Square with pedestrian routes, public seating, landscaped spaces and outdoor seating associated with commercial uses; The provision of communal lounges (12.2sqm each) on floors 1 to 4 of the Bakers Corner Building (Building A).
- The provision of 2no. commercial units (approx. 127.5 sqm and 273.3sqm) at the ground floor level fronting Rochestown Avenue in the Student Accommodation Building ('Building B') and the Bakers Corner Building ('Building A') respectively.
- The realignment of the existing car parking spaces to provide 34 no. car parking spaces (including 3 no. Accessible car parking spaces), 1 no. loading bay and 330 no. bicycle parking spaces at surface level and in secure stacked cycle parking store. Waste management area (24.8sqm) and plant room (60.9sqm) at ground floor level.
- Alterations to the existing vehicular and pedestrian entrances from Rochestown Avenue including the provision of a formalised pedestrian route, and the creation of a new pedestrian and cyclist entrance via Kill Avenue.
- Associated site and infrastructural works including the provision for water services, foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works including the provision of 3 no. roof terraces at fifth floor level (approx. 451 sqm, 150sqm and 60sqm sqm respectively); green roofs (97sqm and 142sqm), boundary treatments, electrical services and all associated site works.
- The application contains a statement setting out how the proposal will be consistent with the objectives of the relevant development plan.
- The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed

development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

Other minor planning applications related to changes to the uses, alterations and extensions to buildings within the overall application lands, and are noted below for the convenience of the Planning Authority

Baker's Corner Public House & Off-Licence

- **Reg. Ref. D98A/0678 – Granted by DLRCC on 24 November 1998:** Retention permission and permission granted for an extension to the existing licensed premises to include single story off-licence. There were no appeals, so a final granted was issued on 24 November 1998. One of the conditions was that four car parking spaces shall be reserved and appropriately marked for use in connection with the off-licence.

- **Reg. Ref. D00A/0002 – Granted by DLRCC on 06 July 2000 :** Permission granted for alterations and extension to the existing licensed premises. There were no appeals, so a final granted was issued 06 July 2000.

- **Reg. Ref. D02A/0052 – Granted by DLRCC on 08 May 2002:** Retention permission granted for minor alterations to previously approved planning application Reg. Ref. D00A/0002. There were no appeals, so a final grant was issued on 08 May 2002.

The Forge Building

- **Reg. Ref. D98A/0910 – Granted by DLRCC on 28 January 2000:** Permission granted for the demolition of the existing houses including former 'Smithie' (Protected Structures List 2 of the County Development Plan) and construction of a 2 storey, mixed use development consisting of 2 no. offices and 4 no. maisonettes at first floor level and 4 no. retail units at ground level. There were no appeals, so a final grant was issued on 28 January 2000.

  As part of this application the applicant was conditioned to retain the former Smithie's Arch (the only part of the Protected Structure deemed worthy of retention) and erect it as a free-standing feature. However, it was found that relocation of this structure was not favourable due to the structure's poor structural integrity. By way of condition, it was decided a facsimile of the arch would be acceptable.

- **Reg. Ref. D03A/1185 – Granted by DLRCC on 18 March 2004:** Permission granted for minor alterations to previously approved Reg. Ref. D98A/0910 to provide for the following: reconfiguration of retail units, provide a bookmaker's shop, provision of an ATM, change of use from attic space to provide 1 no. office unit, provision of 3 no. satellite dishes and 2 no. condenser units at roof level and associated elevational alterations. There were no appeals, so a final grant was issued on 18 March 2004.

  The proposed change of use of the attic to office omitted by way of condition because the increase of office space to c.288 sqm was considered excessive within a residential zoning. The zoning of the site was subsequently changed from residential to Neighbourhood Centre under the 2004 County Development Plan, which prompted the following application for permission.

- **Reg. Ref. D04A/0672 – Granted by DLRCC on 16 September 2004:** Minor alterations to previously approved 2 storey, mixed retail, commercial and residential development Reg. Ref. D03A/1185 to provide for a change of use of permitted attic space to provide 1 no.

office unit. DLRCC granted permission on 11 August 2004. There were no appeals, so a final grant was issued on 16 September 2004.

- **Reg. Ref. D19A/0582 – Granted by DLRCC on 06 November 2019:** Permission granted for a change of use of part of the first floor, Unit 3, of the existing mixed-use building from office use to use as a dental surgery. There were no appeals, so a final grant was issued on 06 November 2019.

- **D04A/0672 – Granted by DLRCC on :** Alterations to previously approved two storey mixed retail commercial and residential development, D03A/1185, to provide for a change of use of previously approved attic space, to provide 1 no. office unit. Condition No. 2 tied the permission back to the terms and conditions of Planning Permission Reg. Ref. Nos. D98A/0910 and D03A/1185. Also, Condition No. 5 stated that: *"The maximum floor area o the overall office element (existing and proposed) shall not exceed 250 sqm. in this regard the applicant shall reduce the floor area of the proposed office by increasing the size of the two duplex apartments adjoining to the proposed office to the south at attic level. Revised drawing drawings in this regard shall be submitted for written agreement to the planning Authority prior to commencement of development."*

- **D03A/1185 – Granted by DLRCC on :** Alterations to previously approved two storey, mixed retail, commercial and residential development Plan. Reg. Ref. No. D98A/0910, to provide for the following:
    a) Reconfiguration of previously approved ground floor retail units 1 and 2,
    b) To provide a bookmakers shop,
    c) Provision of an automatic bank teller machine (ATM) at ground floor level,
    d) Change of use of previously approved attic space to provide 1 no. office unit,
    e) Associated elevational alterations.

  The proposed change of use of the attic to office, was omitted by way of condition as the increase of office space to c.288 sqm was considered excessive within a residential zoning. It was also conditioned that the ridge height of the proposed development should not exceed 9.175 sqm, as approved under D98A/0910.

- **D02A/1064 – Granted by DLRCC on :** Alterations to previously approved 2 storey mixed retail, commercial, and residential development plan Ref. Ref. D98A/0910, to provide for:

4.2 Planning History of Surrounding Sites

Ashbury Nursing Home

Ashbury Nursing Home is located on the corner of Rochestown Avenue and Kill Lane adjacent to the subject site.

- **Reg. Ref. D05A/0374 – Granted by DLRCC on 20 May 2005:** Permission for demolition of modern extensions to the north and south of the main house (Protected Structure), the demolition of the existing link structure and the construction of a new link structure, new oratory and new extensions to the north and south of the main house, some internal alterations to the main house, four additional car parking spaces and associated site works. There were no appeal so a final granted was issues on 20 May 2015
- **Reg. Ref. D09A/0610 – Granted by DLRCC on 19 November 2009:** Permission granted for two storey extensions and alterations and associated site works at the existing grange wing at Ashley Nursing Home. The application relates to a building located within the curtilage of a Protected Structure. There were no appeals so a final grant was issued 19 November 2009.
- **Reg. Ref. D13A/0304 – Granted by DLRCC on 19 September 2013:** Permission for development and retention consisting of 196 sqm of additional day space at ground floor level to the existing 'Grange Wing', new signage to east elevation, reconfiguration of car

parking and provision of a disabled parking bay and bicycle parking, alterations to previously approved landscaping (Ref Ref D09A/0610). There were no appeals so a final grant was issued 19 September 2013.

- **Re. Ref. D14A/0784 – Granted by DLRCC on 10 March 2015:** Permission and Retention permission for a single storey extension and alterations to staff area and bin store, single storey sitting room extension attached to the existing link/oratory building. The development to be retained is the single door linking the dining room to the garden on the western facade. There were no appeals so a final grant was issued 10 March 2015

Dun Laoghaire Institute of Art Design + Technology (IADT)

IADT is a third level education institute located in close proximity to the subject site (approx. 120 m walk to entrance). The most recent major application for this site is outlined as follows.

- **Reg. Ref. D11A/0263 – Granted by DLRCC on 01 September 2011:** Permission granted for the following: (a) a 5,710 sqm 3 storey Digital Media Teaching Building, (b) a 1,973 sqm 2 storey Consolidated Workshop Building, (c) a 2,738 sqm double storey height Sports Hall with ancillary accommodation at the upper (first floor) level. There were no appeals, so a final grant was issued on 01 September 2011.

Glebe Hall

Glebe Hall is located on the corner of Kill Avenue and Rose Park, in close proximity to the subject site.

Reg. Ref. D03A/1104 – Granted by DLRCC 06 August 2004: Permission granted for the demolition of the existing unoccupied Rose Park Hotel (a two storey structure) and the construction of an apartment building ranging in height from 2 storeys to 4 storeys, (including penthouse level), comprising of 39 no. apartments with access for basement car parking from Kill Avenue with bicycle store, associated site works and landscaping including protection and retention of selected existing trees. There were no appeals, so a final grant was issued on 06 August 2004.

Adjacent Area of Open Space

Adjoining part of the southeast boundary of the subject site is an area of open space, however it is zoned for residential development under the current County Development Plan. A review of the planning history confirms this area is to be reserved as public open space as conditioned by Reg. Ref. H/929, the original parent permission of the Grangewood development. Specifically, Condition 7 of this permission states:

"That the areas shown as open space and play area be reserved as public open space and levelled, soiled, seeded and landscaped to the satisfaction of the county council and to be available for use by residents on completion of their dwellings, and that the land shown as open space be in full ownership of the developer prior to commencement of development."

The residential zoning is therefore no longer relevant as they cannot be used for any future residential development.

4.3 Statutory Notice Check

Section 17 of the Planning Application Form sets out a requirement to consider the following vis a vis the subject site:

Do any statutory notices (e.g. Fire Safety, Enforcement, Dangerous Buildings, Derelict Sites, Building Control etc.) apply to the site and/or any building thereon?

We note that there are no notices of immediate relevance to the subject site.

4.4 Planning Comment on Planning History

From an assessment of the planning history at the subject site and surrounding lands, it is apparent that there are a number of factors and considerations held by the Planning Authority and An Bord Pleanála in respect of the subject site pertaining to the form and function of its development.

In this regard, it is submitted that full consideration of past applications and Council/Board opinion has been had in the preparation of the proposed amendments application, and it is our due consideration that the Local Authority should recognise the proposed amendments as representing the most appropriate form of development for this site.

The form and scale of what is currently being applied for on the application site by way of amendments also represents the current operational requirements of the appointed management company to the permitted Student Accommodation operation on site, and we would encourage the Council to recognise the importance of an economically and operationally functioning development in their assessment of the development proposal herein.

5 PRE-PLANNING CONSULTATION

5.1 Stage 1 – Section 247 – PAC/LRD1/013/25

The evolution of the scheme has been driven by engagement with the Planning Authority within the LRD process. The Applicant and Design Team formally engaged in preliminary discussions with the Planning Authority presenting a draft outline of the proposed development under Reference PAC/LRD1/013/25.

Comments from the Dún Laoghaire-Rathdown County Council representatives present at this meeting were considered and the design team prepared an updated proposal based on the feedback received.

All matters raised by the Planning Authority have, where possible, been addressed in the proposal now submitted.

The proposed development at S247 Stage was detailed as follows:

"A 4 storey over ground extension of c. 436 sqm to the rear/ courtyard elevation of Block A to provide for an additional 12 no. student accommodation units. The reconfiguration of permitted internal circulation and communal amenity spaces to provide for 10 no. additional student accommodation units within Block A. The internalisation of an overhang roof canopy on the roof terrace of Block A to provide 2 no. additional student accommodation units. The total number of additional student units proposed is 24 no. providing a total of 300 no. units on site.

The proposed development amendment works also comprise the:-

Removal of the permitted building overhang at 5th floor level of Block A.

Relocation of a switch room and substation to the north-eastern corner of Block A.

Reduction in size of the screened roof-top terrace areas to Block A and Block B.

Reduction in height of stair core and lift over-run to western stair core of Block B.

Reduction in the size of the permitted commercial (retail) units in Block A and Block B owing to the requirement for additional plant space, and insulation treatment.

All associated elevational changes, site development and landscape treatment works necessary to facilitate the proposed development and consequent amendments proposed".



Figure 5– S247 Site Layout Plan

5.2 Section 247 – Response

A Section 247 meeting held on 04 November 2025 between Dún Laoghaire-Rathdown County Council and the applicant, along with the appointed design team.

The following items were raised during the course of the meeting. At this point we wish to provide comfort to the Planning Authority that the Applicant is dedicated to pursuing a high quality scheme on site, supported by reputable and experienced operators and commercial businesses on this landmark Neighbourhood Centre zoned lands and are eager to work with the County Council to ensure the delivery of same.

The points raised during the meeting, and the Applicant's response are set out in a table hereunder, categorised under interdepartmental topics.

Parks Department	
Point of Note	**Applicant's Response**
Contribution in lieu if open space <15% of site area.	The applicant is willing to comply with any conditions in respect of development contributions, noting however that a compliance submission has already been agreed with the Council for S48 Development Contributions in respect of the development – which includes a class 1 payment in respect of community & parks facilities. It is submitted that any further development contributions would be reflective of the uplift in the development sought by way of the amendment application only.
Arborist Report required for adjacent trees abutting site boundary – particularly trees at south-east pedestrian gate.	An arborist survey and report will be submitted as part of any forthcoming planning application, and landscaping proposals will follow on from recommendations and advise from the appointed arborist. The current landscape proposal reflects the most viable position for soft landscaping based on the receiving and permitted environment and this will be demonstrated in the landscaping masterplan and rationale for the site.
Public open space to be clearly identified on drawings.	As requested by the Parks Department all open space will be clearly demarcated on the architectural and landscape pack accompanying the application.
Impact on residential amenity of the reduction in student facilities (open space terraces and internal common rooms).	The support planning report to the forthcoming planning application will explore any potential impact on residential amenity due to the reduction in external roof terraces, and internal common rooms. This commentary will be supported by relevant technical reports and Development Plan management guidelines in this regard.
Provide an assessment of the quality and usability of the remaining open space.	As stated herein, the applicant is seeking to peruse a 'best in class high quality neighbourhood centre development based on student accommodation facilities and supporting commercial businesses- all set within a quality landscaped urban realm. The open space proposed throughout the scheme will be assessed and its quality and usability clearly demonstrated to the Council.

Transport Department	
Point of Note	**Applicant's Response**
Need to clarify the parking arrangements for the existing commercial units and access for cycle parking generally. Any changes from the permitted scheme?	While 24 no. additional units are proposed – there is already a significant number of cycle parking provision on site (as acknowledged by DLR), so no uplift in cycle parking facilities is proposed as part of the amendment application. However, the forthcoming planning application will provide clarification on the breakdown of cycle parking facilities on site – in terms of commercial and residential allocation, long and short term storage, and the location of the facilities within the development lands.
Updated car parking management plan for revised scheme.	As requested, an updated revised car parking management plan will be submitted as part of the amendment application to support what has been submitted in relation to the parent application on site. This management plan will include the bicycle parking areas within the scheme.
Submit an audit to address passive surveillance, usability, visibility, lighting, and a general review of the internal parking area.	A bicycle parking audit will accompany this application outlining the nature and location of parking facilities on site, the quantum of same, the allocation to commercial and residential occupiers and a comprehensive assessment regarding the usability and safety of the internal bicycle parking area – including the type of parking and storage facilities proposed.
Need to liaise with Tom in transport regarding the Rochestown Active Travel Scheme prior to lodgement	The development's design team area willing to liaise with the Council's transportation department in advance of any planning application lodged with regards to car, bicycle parking, access and the Rochestown Ave Active Travel Scheme, as requested.

Drainage Department	
Point of Note	**Applicant's Response**
OSCSC need to engage re Q-bar drainage, wayleave, diversion, SUDS, COF dated within 6 months prior to lodgement.	In advance of any amendment planning application on the subject site, the scheme's consulting engineers O'Connor Sutton Cronin, will engage with the drainage department of DLR to fully ascertain their requirements vis-à-vis the content of an engineering services report to support the application. Matters regarding wayleave, diversion details, a COF, green roofs

	and SUDS will all be comprehensively dealt within therein.
Clarify that green roof to be maintained in terms of % coverage.	It is the applicant's full intention to maintain the 50% green roof provision on site through PV panels and biodiversity solutions - and the nature and extent of same will be clearly set out within the forthcoming application pack.
Confirmation that amendments do not materially alter drainage strategy.	The proposed amendments sought on site do not materially alter any drainage or engineering infrastructure already permitted on site. A statement of same will be contained within the engineering services report submitted by OCSC.
Commentary on implications for SUDS/attenuation due to extension/rooftop changes.	All and any technical changes to SUDS, attention and drainage generally will be explicitly set out on drawings and engineering reports enclosed with the planning application pack, to provide assurances to DLR in this regard.

Planning Department	
Point of Note	**Applicant's Response**
Accept that the use has been established on site – but need to provide a planning justification for the increase in bedspaces.	Whilst the proposed use of student accommodation on site has been established on the NC zoned lands through the parent application, the proposed increase in numbers will be justified within the planning report accompanying the application, to provide the Planning Authority comfort in terms of the acceptability of the proposal. All residential amenity standards are maintained and enhanced, and the updated proposal reflects more closely the requirements of the operations and indeed IADT in terms of unit mix.
DLR consider the 3rd parties from original application will be a consideration with the amendment application	This is noted, and the previous concerns of the 3rd parties will be readdressed and appropriately responded to within the planning report accompanying the application.
Need to provide a robust rationale for the reduction in commercial floorspace & demonstrate why this is being proposed, in terms of compliance with SLO42 development plan objective pertaining to the site.	The scheme's compliance with SLO42 will be addressed within the planning report. The design team are currently relooking at the commercial floorspace reduction in an effort to mitigate any unnecessary commercial floorspace loss before the application is presented to the Council. Any minor floorspace reduction in the public house or two commercial units will be supported by a robust and justified rationale. It is noted at this point that there is no reduction in commercial unit numbers or retail / pub offer, per se on this

	NC zoned site – instead a small reconfiguration of gross floor space within the blocks to accommodate plant an infrastructure. However, all efforts are now being made to further reduce the commercial floorspace loss in order to satisfy the concerns of the Planning Authority.
Demonstrate that there are commercial operators interested in the scheme.	Where possible, letters of intent will be provided at planning stage from potential occupiers of the commercial units on site. It is noted that the Applicant is actively in talks with a number of commercial operators in respect of occupancy of these units which will add to the viability and vitality of this neighbourhood centre development.
Demonstrate if the plant room encroaching on the commercial floorspace in Block A is in the best location – pursue alternative options.	As mentioned above, the design team are currently relooking at the workability of the commercial floorspace and the potential relocation or resizing of the plant room the subject of this amendment application, in an effort to pursue alternative options.
DENSITY: - S.3.3.6 Guidelines indicate a presumption away from 300 units/ha. Appendix B of the Guidelines – note the density calculation method here and provide same in relation to new proposal.	The density calculation provided was based on the same calculation format as the parent application in 2021 for direct comparative purposes. It is noted that this development is well within the 300 units/ha maximum parameters. The density currently proposed is 188 units/hectare (The granted scheme is 175 units/hectare). Acceptability of the scheme's density in terms of national and local planning policy will be comprehensively set out in the final application pack.
Elevations – DLR looking for CGIs – re a view to Kill Avenue, and a rationalisation of elevational treatments. Impact of the 4-storey extension on internal courtyard including visual impact.	A comprehensive assessment of the visual impact of the proposed amendments to the scheme will be provided for the Planning Authority and supported by detailed annotated elevations and CGIs for the purposes of properly determining the acceptability of the proposal.
Application should demonstrate how the scheme contributes to NC zoning; legibility & access to church; universal access principles; and that this is not a student only development but a neighbourhood asset with public square etc.	The supporting planning report to this amendments application will set out a detailed context to the development in terms of its compliance and contribution to the NC zoning objective, its integration with the receiving environment, and how the new built fabric will contribute to an augmented neighbourhood setting – with access for all principles, permeability, and legibility all contributing factors to the planning gain of the scheme.
Need to demonstrate Part M compliance.	This proposal will be fully in line with the requirements of Part M, ensuring that all aspects of accessibility and usability are appropriately

	addressed. The design and specifications will comply with current regulations to provide inclusive and accessible facilities for all users, and this will be set down in the relevant forthcoming planning application documentation.
All finishes should be compliant with DLR Taking In Charge standards, although the scheme is to be privately managed.	We submit that all materials and development specifications will be fully compliant with the Council's taking in charge standards, and this will be formally committed to within accompanying application reports and drawings.
Reference SPPR8 within Apartment Guidelines re student accommodation.	Full compliance with the 2025 apartment guidelines with regards to the student accommodation will be demonstrated within the planning report for the comfort and assurances of the Planning Authority and to assist their determination of the scheme proposal.
DLR have no objections to the modifications to the lift shaft within Block B.	This is noted and welcomed by the applicant. The reduced bulk within Block B will be a welcome amendment to the scheme and a positive amendment to the permitted development in terms of scheme massing and visual impact. This will be set out and demonstrated on relevant drawings and reports.
New application should focus on the elevational interfaces vis-à-vis the public realm.	All changes since the grand of the parent permission will be incorporated into this amendment application, and the detailed modifications to the elevational treatments where the blocks about the public realm will be clearly set out for the Council.
Scheme should have regard to the provision of high quality signage detail throughout – no neon lighting etc.	Signage within the scheme will be designed and executed to a high standard ensuring a refined and cohesive visual appearance throughout the development, which will complement the overall architectural character of the scheme. All signage will be clear, well-proportioned and consistent in format to contribute to the high quality aesthetic appropriate to this development. This will be stated and confirmed within the planning documentation and the Applicant is happy to comply with any conditions of permission in this regard.

Architecture	
Point of Note	**Applicant's Response**
Need to clarify height and areas of Blocks – are these changes to the development or discrepancies?	The applicant will provide a formal response to the issues regarding the footprint and height of the permitted development blocks vs the blocks

	within the amendment application. All changes will be annotated fully on drawings and set out in accompanying planning and architectural reports and a rationale for same will be provided. By way of information, it is submitted that these marginal changes pertain to inter alia fire requirements etc. Such changes will be regularised by inclusion in the forthcoming amendment application, and included in public notices etc. Further detail in this regard is set out in the appendices below.
DLR seeking all changes in floor areas and heights to be set out in a table from permitted to amended.	As stated above, all changes will be explicitly annotated on architectural drawings and set out in table format in accompanying reports for the assessment and convenience of the Planning Authority. Further detail however has been set out in the appendices below for information purposes at this stage.
All changes are to be legitimatised inside the red line – for instance, public notices stating, 'modifications to front elevation'. No need to go into huge detail on this but just a coverall re the changes occurring since the grant from ABP.	Again, the Applicant is willing to comply with all requests in this regard. All changes will be included within the parameters of the amendments application to including the building footprint, height, and elevational changes.

Compliance	
Point of Note	**Applicant's Response**
DLR express concern over what is being submitted via compliance with permission conditions and what is being sought via amendments, and this should be properly addressed and be consistent within the forthcoming application.	A review of the relevant conditions attached to the grant of parent permission will be carried out vis-à-vis the impact of proposed amendments on approved compliances. All amendments will be consistent with compliance conditions, and this commitment will be stated within planning application technical reports and clearly highlights where compliance items overlap with any proposed amendments.

Landscape/ Open Space	
Point of Note	**Applicant's Response**
Explore the need to increase the open space on roof of Block A in terms of area and quality.	In advance of lodgement, the design team will assess the quantum of open space in the form of roof top terraces to ascertain the need to expand where possible the space provided to meet the needs of the student population.

Need to provide a rationale surrounding the quantum of open space proposed vs the quantum of bedspaces.	The final quantum of open space provided, both at roof level, and generally throughout the scheme will be clearly set out vis-à-vis the quantum required to meet the overall number of bedspaces proposed and a rationale for same will be clearly outlined in accompanying planning and landscaping reports to the application submission.
Daylight/Sunlight analysis required - impact of amendments on the amenity spaces?	Provisional daylight and sunlight studies have been carried out with positive results both on the new floor areas and bed spaces proposed and on the amenity spaces within the scheme. These studies will be refined and finalised and enclosed within the forthcoming application pack for assessment by the Local Authority.
Reinforce what is not being amended as part of the application.	By way of note, the landscaping proposal has been kept as close as possible to previously granted scheme, and consideration has been given to ensuring that tree locations and soft landscaping parcels are genuinely viable. The site is extremely permeable and attractively landscaped as a neighbourhood centre development and any changes to the overall landscaping proposal will be set out on drawings and supporting landscaping reports submitted with the final application.
Demonstrate that green roofs are being maintained/expanded via PV or biodiversity.	As an overlap with engineering and landscaping consultants, the nature and extent of green roofs within the scheme will be set out in their respective submissions as part of the application pack.

Other Items	
Point of Note	**Applicant's Response**
Operational Waste Strategy - Does existing waste provision accommodate additional numbers?	An updated OWMP will be prepared by the scheme's consultant engineers to reflect the proposed increase in student bed numbers, and the amendment to commercial floorspace – if and where this impacts commercial waste management.
How is commercial waste being dealt with within the scheme?	Within the revised OWMP, clarification will be set out within regards to the management of waste for the 3 commercial units within the scheme (1 no. public house and 2 no. commercial-retail units).

Need to provide an updated AA Screening report.	Updated environmental screening will be carried out and reports pertaining to same will be enclosed in the final planning pack as required.
Need to provide an updated COF from Uisce Eireann.	A updated COF (dated within 6 months as stipulated) for the revised scheme will be applied for and included in the amendment planning application pack.

5.3 Pre-Planning Conclusion

Following this meeting and the applicant's response to Council queries, the Local Authority considered that sufficient information had been provided and that further pre-application engagement would not materially assist in the further assessment of the proposal. As such, the Planning Authority considered the proposed amendments were suitably developed to allow the application proceed beyond Stage 1 of the process directly to Stage 3, the application for which is set out herein. Confirmation of same was issued by the Council the Applicant in writing on 01/12/2025, stating that:-

'*The Planning Authority can confirm that it has been determined that subject to the provisions within Section 247(7) of the Act, no further consultation is required in this instance, and the applicant may proceed with the lodgement of the application for the amendments to the permitted development…'*

A copy of this confirmation is enclosed herein as part of this planning application submission.

All feedback from Dún Laoghaire-Rathdown County Council has been closely considered in the final design of the proposal and in the preparation of the inputs supporting this LRD Application. We trust that this will be to the satisfaction of the Local Authority.

6 DESCRIPTION OF PROPOSED DEVELOPMENT

The proposed development seeks to make minor amendments to the permitted parent Strategic Housing Development under Ref. ABP-311411-21.

The proposed amendments include:

- **A 4 storey over ground extension of c. 436 sqm to the rear / courtyard elevation of Block A to provide for an additional 12 no. student accommodation units.**
- **The reconfiguration of permitted internal circulation and communal amenity spaces to provide for 10 no. additional student accommodation units within Block A.**
- **The internalisation of an overhanging roof canopy on the roof terrace of Block A to provide 2 no. additional student accommodation units.**
- **The total number of additional student accommodation units proposed is 24 no. providing a total of 300 no. units on site. 276 units are permitted on site.**

The proposed development amendment works to Block A will also comprise of the following:-

- Removal of the permitted building overhang at 5th floor level of Block A.
- Relocation of a switch room and substation to the north-eastern corner of Block A.
- Provision of additional window and escape door to permitted licenced premises on northern elevation.
- Amendment of the permitted entrance to provide for a recessed entrance arrangement to the permitted licenced premises in Block A.
- Omission of the roof terrace to the south of Block A, and the increase in size of the permitted roof terrace to the east of Block B from c. 60sqm to c. 95sqm.
- Minor amendment of fenestration at 1st-5th floor level on the southern elevation of Block A to accommodate proposed internal rooms.
- Additional plant space within permitted commercial units in Block A with a reduction in net internal floor space.
- Omission of louvred plant screen on roof level of Block A.
- Changes to the materials of the permitted elevations of Block A.
- Changes to the permitted development signage on elevations of Block A.

The proposed development amendment works to Block B also comprise of the:-

- Reduction in size of the screened roof-top terrace area to Block B (from 450 sqm to 150 sqm).
- Reduction in height of stair core and lift shaft to western stair core of Block B.
- Relocation of the permitted bike shelter to the east elevation of Block B. The number of bicycle parking spaces remains unchanged.
- Minor elevation alterations to eastern and western elevations of Block B to account for relocation of permitted internal building services.
- Additional plant space within permitted commercial unit in Block B with a reduction in net internal floor space.
- Changes to the materials of the permitted elevations of Block B.

The proposed amendments to the development will also include a minor increase to the overall height of both permitted blocks (of c. 550 mm) due to building structure design; as well as minor changes to the scheme as agreed at compliance stage including inter alia the reconfiguration of the central open space area to provide for 30 no. car park spaces (unchanged from agreed compliance); and all

associated elevational changes, site development and landscape treatment works necessary to facilitate the proposed development and consequent amendments proposed.



Figure 7 – Proposed Site Layout Plan

6.1 Key Changes to the Development as Permitted

A comparison of the key development parameters are set out below:

DEVELOPMENT PARAMETER	ABP Ref. 311411-21 (Granted SHD Scheme)	Development Proposal at S247 Stage (LRD)	Current Development Proposal at Application Stage
Site Area	0.483 ha	No Change	**No Change**
Development Type	Strategic Housing Development – Student Accommodation	Amendments to an approved Student Accommodation based Mixed Use Development	**Amendments to an approved** **Student Accommodation based** **Mixed Use Development**
Demolition (existing public house)	1,378 sqm	No Change	**No Change**
Public House (proposed)	292.4 sqm	265.1 sqm	**272.3 sqm**

No. of bed spaces	276 no. bed spaces in 38 no. clusters of 6-8 bedrooms	300 no. bed spaces in 42 no. clusters of 3-8 bedrooms and studios.	**300 no. bed spaces in 42 no. clusters** **of 3-8** **bedrooms and studios.**
Ancillary student facilities* (excluding terrace areas)	797.9sqm	621.7sqm *(Reduction mainly due to plant and bike storage layout requirements)*	**621.7sqm**
Commercial Units	Block A – 273.2sqm Block B – 127.5sqm	Block A – 213 sqm Block B – 114.6 sqm	**Block A – 239.5 sqm** **Block B – 126.1 sqm**
Roof Terraces	Total – 661 sqm Block A: 150 sqm & 60 sqm Block B – 451 sqm	Total – 210 sqm Block A – 60sqm Block B – 150 sqm	**Total – 245 sqm** **Block A – 95 sqm** **Block B – 150 sqm**
Unit Mix	Total – 38 no. clusters 6-bed cluster – 3 no. (8 %) 7-bed cluster – 22 no. (58%) 8-bed cluster – 13 no. (34%)	Total – 42 no. clusters 3-bed cluster – 4 no. (10%) 6-bed cluster – 3 no. (7%) 7-bed cluster – 23 no. (54%) 8-bed cluster – 12 no. (29%) Studio Units – 11 no. (4% of overall bedspace)	**Total – 42 no. clusters** **3-bed cluster – 4 no. (10%)** **5-bed cluster – 7 no. (17%)** **7-bed cluster – 22 no. (52%)** **8-bed cluster – 12 no. (19%)** **10-bed cluster – 1 no. (2%)** **Studio Units – 26 no. (9% of overall bedspace)**
Density*	175 units per ha (276 bed spaces on an approx. 0.483 ha site with 4 bedspaces considered as 1 unit equivalent)	188 units per hectare (300 bed spaces on approx. 0.483 ha site with 4 bedspaces considered as 1 unit equivalent)	**188 units per hectare** (300 bed spaces on approx. 0.483 ha site with 4 bedspaces considered as 1 unit equivalent)
Height	4 – 6 Storeys	No Change	**No Change**
Car Parking spaces	Total Permitted – 30 no. spaces	No Change	**No Change**
Cycle Parking	330 no. spaces	No Change	**No Change**
Part V	None	No Change	**No Change**
Elevational Materials	Subject to change and refinement as part of this amendment application to both Block A and Block B including permitted signage modifications.		

Table 1 – Comparitive Table of LRD Proposal and Previous Permitted SHD

****Gross density calculation for scheme comparative purposes only.***

6.2 Proposed Floor Changes Block by Block & Floor by Floor

	Block A	**Block B**
Ground floor	• Relocation of a switch room and substation to the north-eastern corner of Block A. • Amendment of the permitted entrance to	• Relocation of the permitted bike shelter to the east elevation of Block B. The number of bicycle parking spaces remains unchanged.

	provide for a recessed entrance arrangement to the permitted licenced premises. • Additional plant space within permitted commercial units with a reduction in net internal floor space.	• Additional plant space within permitted commercial unit in Block B with a reduction in net internal floor space
First Floor	• Additional 3 bed cluster to the rear / courtyard elevation • 2 no. additional studio units • 1 no. additional room included in existing 8 bed cluster	No Changes
Second Floor	• Additional 3 bed cluster to the rear / courtyard elevation • 2 no. additional studio units 1 no. additional room included in existing 8 bed cluster	No Changes
Third Floor	• Additional 3 bed cluster to the rear / courtyard elevation • 2 no. additional studio units 1 no. additional room included in existing 8 bed cluster	No Changes
Fourth Floor	• Additional 3 bed cluster to the rear / courtyard elevation • 2 no. additional studio units • 1 no. additional room included in existing 8 bed cluster • Omission of the roof terrace to the south • Increase in size of the permitted roof terrace to the east from c. 60sqm to c. 95sqm.	No Changes
Fifth Floor	• 3 no. additional studio units • 2 no. additional rooms included in existing cluster • Removal of the permitted building overhang.	• Reduction in size of the screened roof-top terrace area to Block B (from 450 sqm to 150 sqm).
Roof Level	• Omission of louvred plant screen	• Reduction in the height of the stair core and lift shaft to west stair core.

Table 2 – Propsed Changes to Block A and Block B

6.3 Detailed Description

Permitted Demolition

The permitted development includes demolition of all existing buildings on site including the Baker's Corner public house with a total area of demolition being approximately 1,378sqm. There are no amendments proposed to the permitted demolition as part of the parent SHD permission (Ref. 311411-21). The construction programme has commenced on site at this stage and all permitted demolition of the existing buildings and removal of trees on site has taken place.

Student Accommodation

The permitted scheme provided for 38 no. clusters, comprising 276 no. student bed spaces, with associated ancillary living, kitchen and dining areas. A total of 24 no. additional student accommodation units are proposed as part of this LRD amendment application.

The proposed development will give rise to total of 300 no. student bedspaces arranged in 42 no. high-quality cluster units varying in size between 3, 5, 7, 8 and 10 bedrooms. The scheme also includes 26 no. studio units to ensure inclusivity and flexibility of accommodation types.

The proposed development will give rise to total student accommodation development mix of 42 no. clusters as follows:

- 3-bed cluster – 4 no. (10%)
- 5-bed cluster – 7 no. (17%)
- 7-bed cluster – 22 no. (52%)
- 8-bed cluster – 8no. (19%)
- 10-bed cluster – 1 no. (2%)
- Studio Units – 26 no. (9% of overall bedspace)

There has been a consistent growth in the number of full-time students in Ireland over that past number of years and Dublin has seen an increase in full time enrolments into higher education institutes. Given the acute housing shortage already faced by students there is an urgent need to deliver significant additional managed student accommodation schemes within accessible locations relative to third level institutions, and therefore the increase of 24 no. bedspaces proposed is necessary and justifiable.

Commercial Units

The permitted development under SHD Ref. 311411-21 comprised 2 no. commercial units as follows:

- Block A commercial unit (approx. 273.3) fronting Rochestown Avenue and Kill Avenue
- Block B commercial unit (approx. 127.5sqm) at the Rochestown Avenue frontage.

The proposed development now before the Planning Authority proposes a minor decrease in floor area of these 2 no. commercial units as follows (it is noted that the proposed decrease has been improved upon over what was proposed at the S.247 planning stage, and the scheme's architects have successfully been able to reduce the amount of commercial floorspace proposed for amendment):

- Block A commercial unit – approx. 239.5 sqm
- Block B commercial unit – approx. 126.1 sqm

The design team have considered the commercial floorspace reduction and have mitigated any unnecessary commercial floorspace loss in the proposal currently presented to the Planning Authority. The modifications to the permitted commercial floorspace are arising from required additional plant room space to service Block A. Furthermore, on foot of a Fire Safety Audit it was set out that the location of the permitted substation and switch room on site should be relocated to provide a 3m exclusion zone from an operable window or door on site. Finally, the retail space within Block A was originally designed with projecting bays – subsequently proving difficult to implement. The elevations were subsequently revised through the compliance process. All of these factors have caused the marginal changes to the permitted commercial floorspace on site.

It is noted at this point however that there is no reduction in commercial unit numbers and instead a small reconfiguration of gross floor space within the blocks to accommodate a plant and infrastructure. The commercial units brought forward are considered to be an appropriate size considering the site location and proposed development, and will remain as important elements to the operation of the scheme commercially.

Additionally, it is noted that the application lands are zoned NC – Neighbourhood Centre, with a additional objective (SLO42) pertaining to the site which seeks 'to *retain, strengthen and improve important uses at Baker's Corner, which have a strong neighbourhood function, including Retail / Commercial elements and the Public House'.*

The provision of the public house and the two commercial units (totally c. 638sqm) on site will serve to support and strengthen this development as a successfully functioning neighbourhood centre in line with its zoning objective, and in this regard in order to provide comfort to the Planning Authority, letters of intent from commercial agents and operators have been enclosed with the planning submission, demonstrating the level of interest in the occupation of these units once the development comes into operation following construction phase.

Elevational Treatment & Development Signage

Given the notable landmark location of the former Baker's Corner development site, the Applicant acknowledges the importance of the development of signature buildings on this 'signpost' site and in this regard the quality of the block finishes should be exemplary, using the highest quality materials and finishes, that will stand the test of time.

In this regard, the Applicant and the design team have taken an revised approached to the materials proposed as part of this amendment application. An upgraded design proposal has been put forward in this regard for the elevation design and material treatment of Block A and Block B, to significantly upgrade the overall aesthetic of the scheme. We refer the Planning Authority to the enclosed CGIs and Architectural Design Statement prepared by Meitheal Architects which show the tangible upgrade to the finishes on site, and discusses in details the materials and finishes now proposed. We trust that this will be to the satisfaction of Dun Laoghaire Rathdown County Council.

Coupled with the changes to the building finishes, minor upgrades are proposed to the permitted development signage on site, and these are detailed within the accompanying architectural drawing pack, and Design Statement, as prepared by Meitheal, as appointed scheme architects.

Height

The permitted development ranges in height from 4-6 storeys. The proposed development now before the Planning Authority proposes a minor increase to the overall height of Block A and Block B of approx. 550 mm. This minor increase in height is due to building structure design and will not impact on surrounding developments. Overall the amendments remove unnecessary massing on the top of the building reducing the perceived height of the building.

The development also includes minor elevation alterations to eastern and western elevations of Block B to account for the relocation of permitted internal building services.

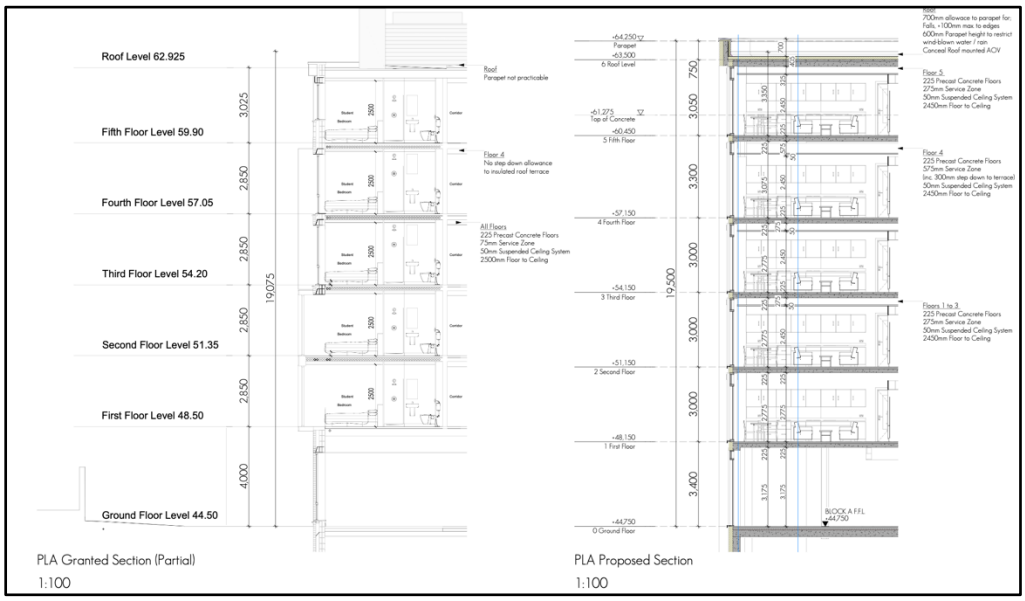


Figure 8 – Granted Vs Proposed Building Height (Block Sectional Drawing)

It is submitted that these marginal changes pertain to inter alia fire requirements and as per the figure above, the proposed height increase will have an imperceptible to minor impact. While the overall block height is seeking a marginal increase, the removal and reduction of plant at roof level mitigates this overall height increase and provides a more simplified elevation and roof profile.

We refer the Planning Authority to the suite of drawings and elevations prepared by the scheme architects as well as to the Visual Impact Assessment which provides a really clear oversight as to the changes proposed to provide an easy assessment of same by the Local Authority.

Density

The proposed development will now result in a gross residential density of 188 uph based on the provision of 300 no. bedspaces on an overall net site area of 0.483 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 net development density is calculated on the following basis for the convenience of the planning authority: -

Metrics	Quantity	Unit of Measurement
Net Site Area	0.483	ha
Overall GFA	9,168.4	sqm
Residential GFA	6,613.5	sqm
Non-residential GFA	2554.9	sqm

Number of residential units	75 (300/4)	No. unit[1]
Residential GFA as a portion of development	72	%
Site Area for density purposes	0.483	ha
Residential Density	216	uph

Table 3 – Proposed Development Density

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. As noted in Section 6.1 above, the previously permitted residential density on site, based on the above calculation protocol is 175uph, and therefore there is only a marginal increase in density at the site resultant from the proposed amendments. The site's accessible location and other characteristics outlined herein provide the context for the acceptability of development density in this region.

Open Space

As part of this amendment application, modifications to the open space of the scheme are proposed.

In this regard, the proposal will provide for 2 no. roof terraces, totalling approx. 245 sqm. Block A will now have a roof terrace of 95sqm, and Block B's revised oof terrace is c. 150sqm. Both of these roof terraces will be landscaped to a high spec both using hard and soft landscaping materials as set out in the accompanying landscape masterplan and report. The management of these roof terraces will be tightly controlled by the scheme's operators and the management of same will be set out in the development's operational management plan.

Additional to these areas of open space, the central square in the form of a civic plaza within the development will provide areas of amenity for both the perspective and local residents. This area is not subject to any changes as part of this amendment application. However for the convenience of the Planning Authority, the hard and soft landscaping plan for same is enclosed.

The proposed quantum and quality of open space is considered appropriate for the development given the nature of the scheme as a neighbourhood centre based on student accommodation and supporting commercial businesses.

At this point, we wish to bring to the Planning Authority's attention the high level of permitted amenity areas that are contained internally within the development, including gymnasium, screening room, exhibition space, common rooms, study areas etc. The breakdown and layout of these spaces is set out in the enclosed Housing Quality Assessment prepared by Meitheal Architects.

The following internal amenity areas are provided at ground floor and fifth floor level:

These internal amenity spaces are of a high quality and are provide sufficient space for students residing within the development. The internal amenity areas are more suited to this development typology over more expansive places of open space given that:-

A) The originally permitted rooftop terraces were ultimately deemed not appropriate for accommodation management when the scheme is operational.

[1] ***Based on 4 bedspaces as '1 unit', as agreed by Dun Laoghaire Rathdown Co. Co. and in accordance with Sustainable Residential Development and Compact Settlement Guidelines.***

B) Poor weather in Ireland will realistically make theses spaces unusable for the majority of the year considering that student accommodation is generally occupied September – May.

The high-quality internal amenity spaces provided for students will safeguard their general residential amenity and are considered by the design team and accommodation operators to be a better solution for the type of scheme proposed over the originally permitted more expansive rooftop terraces. The spaces remaining will serve as amenable breakout spaces for short-term use, to allow students enjoy fresh air during study breaks for instance, and are appropriate sized and designed for in this instance.

We note that the applicant is willing to comply with any conditions in respect of development contributions, noting however that a compliance submission has already been agreed with the Council for S48 Development Contributions in respect of the development, which includes a class 1 payment in respect of community & parks facilities. It is submitted that any further development contributions would be reflective of the uplift in the development sought by way of the amendment application only.

Accessibility and Legibility

The accompanying Architectural Design Statement prepared by scheme architects' Meitheal, demonstrates how this mixed use scheme contributes to the NC neighbourhood centre zoning pertaining to the application lands, through the provision of a mx of uses by way of student accommodation and associated internal and outdoor amenity spaces, commercial retail units and a public house, all centred around a landscaped public square at the heart of the scheme.

The layout of the development has addressed neighbourhood desire lines for access to the church along landscaped public pathways detailed with new trees and other soft landscaping elements.

Universal access principles are also address in the attached Design Statement as well as demonstration with Part M compliance.

Overall it is considered that the permitted scheme, along with its proposed amendments, will become a neighbourhood asset contributing to the immediate area known colloquially as Baker's Corner, and now renamed Baker's Hall, reflecting the student accommodation defining the site. It is submitted that all of this demonstrates compliance with the spirit and intent of the Neighbourhood Centre zoning objective on site as well as the specific SLOs thereon. This will be an attractive permeable, legible development once operational, providing inclusive and accessible facilities for all users, and the design and nature of the built fabric will contribute to an augmented neighbourhood setting, providing planning gain for its receiving environment.

Part V

As set out in the cover letter attached to this planning application, Part V compliance does not pertain to Student Accommodation developments, and accordingly there are no Part V proposals accompanying this amendments application, in line with the approach taken to the parent permission on the application lands.

Car Parking

A total of 30 no. car parking spaces were previously permitted under SHD Ref. 311411-21. The reconfiguration of the central open space area to provide for 30 no. car park spaces was then agreed with Dún Laoghaire-Rathdown County Council through compliance. There are no proposed amendments to the permitted car parking under this amendment application. A car parking management plan has been enclosed as part of this application setting out how the car park will be run and managed in respect of commercial operators and visitors etc. It is considered that this will be to the satisfaction of the Local Authority, and in this regard it is confirmed that there are no spaces allocated to the student population within the scheme.

Bicycle Parking

A total of 330 no. bicycle parking spaces is proposed for the overall development, this remains unchanged from permitted parent SHD Ref. 311411-21.

The following cycle spaces are provided as part of the proposed development:

- Short Stay – 190
- Long Stay / Internal Spaces – 140

This proposed development now before the Planning Authority proposes the relocation of the permitted bike shelter to the east elevation of Block B, and comprise 140 no. long stay bicycle parking spaces.

All residential bicycle parking is proposed to be located within secure, indoor spaces in the building. This provides added security for residents, ensuring that the parking facilities are not only functional but also protected from theft or vandalism. Further details of the bicycle parking storage solutions, and specifications, including security surveillance etc. are set out both in the accompanying Architectural Design Statement prepared by Meitheal Architects and the Bicycle Parking Management Plan prepared by OCSC.

Landscaping

All public and common areas within the development have been specified to an exceptional level of hard and soft landscaping design solutions. The landscaping proposal has been kept as close as possible to previously granted scheme, and consideration has been given to ensuring that tree locations and soft landscaping parcels are genuinely viable, taking into account engineering services, lighting positioning etc. We refer the Planning Authority to the enclosed landscaping pack submitted herein.



Figure 9 – Grade Level Hard Landscape Plan

In respect of Green Roofs, the Applicant and the Design Team are committed to the 50% green roof provision on site through PV panels and biodiversity solutions. The nature and extent of these are set out in both the enclosed Landscaping inputs and Architectural design pack and drawings contained herein.

Trees/Arboriculture

The removal of trees from the site has been agreed with Dún Laoghaire-Rathdown County Council through the parent planning application and subsequent compliance submissions. The development is now under construction, the permitted demolition works are complete commensurate, with the removal of the existing tress on site. Therefore, whilst an updated arborist report was requested by the Council at S. 247 pre-planning state to support the forthcoming planning application, it is respectfully submitted that without any trees on site an arborist report to support the proposed amendments is not required. We trust that this will be agreeable to the Local Authority.

Taking In Charge

Please refer to the proposed Taking In Charge drawing, prepared by Meitheal Architects, enclosed herein. Save a portion of the public domain to the front of the site where it adjoins Rochestown Avenue (clearly delineated on the Taking In Charge drawing) the remainder of the development will be privately managed.

However, for the comfort of the County Council, it is noted that all material and development specifications will be fully compliant with the Council's specified taking in charge standards. The Applicant is happy to comply with any conditions in this regard, and to formalise specific details in relation to same at compliance stage.

Infrastructure

All engineering and infrastructural elements in relation to the development in respect of water supply, wastewater supply and surface water drainage to remain as per the parent SHD permission. The proposed amendments application does not propose any changes to the agreed engineering infrastructure on the application lands. We refer the Planning Authority to inputs herein prepared by Consultant Engineers, O'Connor Sutton Cronin in respect of site's supporting engineering works.

We note at this point that consultation has been had with Uisce Eireann in respect of the proposed amendments and the applicant has the benefit of the Confirmation of Feasibility issued on the previous SHD.

A supplementary Confirmation of Feasibility has been granted in February 2026 for the additional units sought on the site which should provide assurances to the Local Authority in this regard.

Daylight & Sunlight

Digital Dimensions have considered the proposed development in terms of daylight, sunlight and overshadowing assessment, in particular the changes to the permitted development proposal and the consequent impact they may have on the permitted conditions on site.

The following conclusion is noted:

> *"It is our opinion that all habitable rooms within the proposed development achieve the minimum target daylight levels set out in BS EN 17037:2018+A1:2021, as referred to in the BRE guidelines BR209:2022 (3rd edition) and no compensatory measures are required."*
>
> *"All the public and communal amenity spaces are well oriented for sunlight. All achieve 2 hours sunlight on the 21st March over in excess of 50% of the area. The proposed development meets the recommendations for sunlight in the BRE guidelines BR209:2022 (3rd edition)."*

We refer the Planning Authority to the accompanying Daylight & Sunlight Report prepared by Digital Dimensions for further information in this regard. However, from an assessment of this report, it is clearly evident that inter alia the extension to the permitted Block A, the marginal changes in building height and roofing detail will not change the environmental conditions on site over what has been accepted in the parent permission. The proposed student accommodation, and the associated amenity spaces, and central plaza will also experience good levels of daylight and sunlight over guideline minimums, providing comfort to the Planning Authority in consenting to a grant of permission in this case.

Visual Impact

We refer the Planning Authority to the accompanying Visual Impact Assessment prepared by Meitheal Architects, which sets out a comprehensive visual assessment of the changes to the permitted development. This assessment concludes that:-

> *"The proposed amendments represent a considered and design-led refinement of the permitted development, maintaining the approved scale and massing while improving functionality, visual quality and site integration. The changes are modest in extent and respond directly to operational, architectural and stakeholder requirements without altering the overall character or impact of the scheme……Collectively, the proposed amendments improve the quality, efficiency and usability of the development, reduce visual impacts at upper levels, and enhance relationships with surrounding streets and buildings, while remaining fully aligned with the scale and intent of the approved scheme."*

In this regard, it is submitted that proposed development as amended is now a more appropriate design solution for the site, seeking to provide 24 no. additional bedspaces, a minimal uplift in the units permitted on site, as well as some essential design changes to the permitted blocks for construction and operational efficiencies.

The proposed development's amendments will not cause injury to the streetscape and will not have any negative effect on the amenity of the local surrounding area. The extent of changes proposed to the permitted massing is not considered to be material, but relatively modest in nature, and should therefore be considered acceptable by the County Council in this regard.

Waste Management

Addressing requests from Dun Laoghaire Rathdown Co. Co. at S.247 preplanning stage, a Construction and Demolition Waste Management Plan, prepared by Ganson – the appointed building contractors to the development- has been enclosed as part of this amendment application.

Similarly, an Operational Waste Management Plan has been prepared by Wave Dynamics, and enclosed herein for the assessment of the Local Authority. Residential and commercial waste has been accounted for in this assessment to ensure that the solutions proposed on site will meet the operational needs of the scheme following construction phase.

Environmental 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. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a NIS is not required."*

Similarly we refer the Council to the EIA Screening Addendum Note, and the EcIA Addendum Note to their originally submitted reports supporting the parent application on the application lands, both of which conclude that the proposed amendments to the permitted development would not be likely to have significant efforts on the environment.

We trust that this will be to the satisfaction of the Local Authority.

7 STRATEGIC PLANNING CONTEXT & S28 MINISTERIAL GUIDANCE

It is our considered opinion that the key policy documents for consideration as part of this Statement of Consistency are identified as follows:

- National Planning Framework – Project Ireland 2040
- National Student Accommodation Strategy, 2017
- Delivering Homes Building Communities 2025-2030
- Regional Spatial & Economic Strategy for the Eastern and Midland Region
- 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

The parent SHD permission under Ref. 311411-21 has been assessed in detail and is consistent with the National and Regional Planning policy context. We note that the proposed amendments are relatively minor in nature and small in scale and will not alter the character of the permitted SHD.

As such, the proposed development will continue to comply with National and Regional planning policies as set out hereunder.

7.1 National Planning Framework – Project Ireland 2040



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 –

Eastern and Midland Region: approximately 470,000 additional people over 2022 levels (c. 690,000 additional people over 2016-2040) i.e. a population of just over 3 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 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 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 24 no. additional student bedspaces in a permitted development of 276 units with blocks ranging in height from 4 – 6 storeys will deliver on the above objectives of the NPF.

7.2 National Student Accommodation Strategy (2017)



The National Student Accommodation Strategy was published in May 2017 and the purposed of this Strategy is to ensure that there is an increase 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 places 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 24 no. additional student bed spaces for an overall development of 300 no. bedspaces and will help to reduce demand on the private rental section aligned with the principles and objectives of the National Student Accommodation Strategy, 2017.

7.3 Delivering Homes Building Communities 2025-2030



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 Bakers Corner for 24 no. additional student bedspaces on top of an already permitted scheme of 276 no. units will assist in the achievement of the aims of the Delivering Homes Building Communities, 2025-2030 – An Action Plan on Housing Supply and Targeting Homelessness.

7.4 Regional Spatial & Economic Strategy for the Easter 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 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 an re-intensification, the following policy objective is noted:

Consolidation an 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 regards 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 216 dph (net) 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 prime site within Dún Laoghaire. The delivery of student residential development at this location is considered appropriate to this urban, built up area of Dublin.

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

7.5 Sustainable Residential Development & 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.

Areas and Density Ranges

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 Bakers Corner:

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. The are several bus stops in the immediate vicinity of the site offering connections to Dublin City Centre and other employment, educational and recreational amenities and services in the wider Dublin area. There is a bus stop (No. 4485) located directly outside the subject site on the northern boundary there is a bus stop (Stop ID: 4570 – Holy Family Church), which is served by Dublin Bus Service No. E2 and there is another bus stop to the north of junction the site along Abbey Road (Stop ID: 2023 - 90 metres).
- **BusConnects:** The subject site is located directly behind Bus Stop No. 4485 which is serviced by BusConnects route E2 which runs at a frequency of 15 minutes. The No. E2 route is also a 24-hour bus route that runs from Harristown Depot to Dún Laoghaire and back approximately every hour after 11.30 pm until 4.30 am.
- **DART:** The site is also located approx. 2.5 km (34-minute walking distance) from the Salthill & Monkstown DART Station and approx. 3 km (34-minute walking distance) from Dún Laoghaire Train Station. These stations are serviced by DART services northbound to Malahide and Howth (via the City Centre) and southbound to Bray and Greystones.

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 there is 1 no. protected structures (Kill of the Grange Church (Kill)) and 1 no. monument (023-016) located to the east of the subject site.
c) **Impact on the Environment**: The Ecological Impact Statement submitted as part of the parent SHD indicated that the site is not under any wildlife or conservation designation. The site surveys did not record any rare or protected plant species. The Appropriate Assessment Screening Report submitted as part of the parent SHD did not record any effect on any designated European sites.
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:** Uisce Éireann has provided a Confirmation of Feasibility confirming that there is sufficient capacity for water supply and wastewater drainage and infrastructure upgrades are not necessary to either system to facilitate the proposed and permitted development.

Given the divergent character of the area; the historical receiving environment; there are no key ecological receptors or links to European sites; 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 amendments to the parent LRD permission result in a gross residential density of 188 dph (based on 75 no. units i.e. 300 / 4 over 0.483 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."***

We note that Appendix B of the 2024 Guidelines state that when calculating residential densities within mixed use schemes, planning authorities shall exclude the % of non-residential uses in proportion to the net site area, i.e.:

- Calculate Net Site Area
- Calculate the overall GFA
- Differentiate between the % of residential and non-residential GFA
- Reduce net site area by the percentage of non-residential GFA
- Divide number of dwellings by reduced site area.

SRSCG Appendix B Density Calculations	Proposed Development
Calculate net site area	0.483 ha
Calculate overall GFA	9,168.4 sqm
Non-residential GFA	6,613.5 sqm

Residential GFA	2554.9 sqm
Residential as a portion of Development	6,613.5/ 9,1684.4 = 72%
Site Area for Density Purposes	0.483 ha * 72% = 0.34776
No. Units	75[2]
Gross Density	approx. 188 dph
Net Density	approx. 216 dph

Table 3 – Density Calculation as per Appendix B SRSCG

The proposed net residential density of 216 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 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.

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.

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*

[2] ***Based on 4 bedspaces as '1 unit', as agreed by Dun Laoghaire Rathdown Co. Co. and in accordance with Sustainable Residential Development and Compact Settlement Guidelines.***

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, noting however that a compliance submission has already been agreed with the Council for S48 Development Contributions in respect of the development, which includes a class 1 payment in respect of community & parks facilities. It is submitted that any further development contributions would be reflective of the uplift in the development sought by way of the amendment application only.

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."

The reconfiguration of the central open space area to provide for 30 no. car park spaces has been agreed with Dún Laoghaire-Rathdown County Council through compliance. There are no proposed amendments to the permitted car parking under SHD Ref. 311411-21 and agreed compliance. Car parking will be allocated to commercial users/visitors only – there are no spaces allocated to the student community residing at the development – all of which is set out in the accompanying Car Parking Management Plan, prepared by O'Connor Sutton Cronin, Consultant Engineers.

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 development at Baker's Hall provides for 330 no. bicycle parking spaces, significantly exceeding Development Plan standards, promoting sustainable forms of transport, and providing bicycle parking for residential occupants, commercial users, and short-term visitors to the site. Spaces are provided between secure covered storage facilities, and open Sheffield stands.

Further detail in this regard is set out in the accompanying Bicycle Parking Management Plan, prepared by O'Connor Sutton Cronin, Consultant Engineers, and set out in plan form within the enclosed Architectural Drawing Pack.

We submit that the current proposal is consistent with the overall principles of the Sustainable Residential Development and Compact Settlements Guidelines (2024).

7.6 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 24 no. additional student bedspaces to provide for an overall development of 300 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, and in this regard we refer the Planning Authority to the enclosed Housing Quality Assessment which provides a detailed assessment of the layout and areas of the accommodation permitted and proposed on the application lands.

We submit to the Planning Authority that the proposal is consistent with the Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025.

7.7 Design Guide for State Sponsored Student Accommodation, 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.

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 Meitheal Architects for further detail in this regard.

We submit that the amendment proposal is consistent with the Design Guide for Student Accommodation.

8 STATUTORY PLANNING CONTEXT

The Dún Laoghaire-Rathdown County 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.

The subject site is now put forward in accordance with this Development Plan policy context.

8.1 Zoning

The subject site is zoned *'NC – Neighbourhood Centre'* with an objective *'To protect, provide for and/or improve mixed-use neighbourhood centre facilities.'*.



Figure 6 – DLR Development Plan 2022-2028 Zoning Map Extract with subject site outlined in Red

The uses permitted in principle under this zoning objective are:

> *"Advertisements and Advertising Structures, Assisted Living Accommodation, Betting Office, Carpark, Community Facility, Craft Centre/Craft Shop, Childcare Service, Civic Use Cultural Use, Doctor/ Dentist etc., Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Health Centre / Healthcare Facility, Offices less than 300 sq.m., Open Space, Public House, Public Services, Residential, Residential Institution, Restaurant, Service Garage, Shop-Neighbourhood, Sports Facility, Tea Room/ Café, Veterinary Surgery."*

The uses open for consideration under this zoning objective are:

> *"Aparthotel, Cash and Carry/Wholesale Outlet, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Motor Sales Outlet, Nightclub, Off-License, Office Based Industry, Offices over 300 sq.m, Place of Public Worship, Residential – Build to Renta , Service Station, Shop-Specialist, Shop District,* ***Student Accommodation*** *, Travellers Accommodation".*

The site is subject to Specific Local Objective SLO 41 – *'To seek the retention of the existing streetscape at Baker's Corner, which comprises Baker's Corner Public House and its ancillary envelope of structures'* and SLO 42 – *'To retain, strengthen and improve important uses at Baker's Corner, which have a strong neighbourhood function, including Retail / Commercial elements and the Public House'*.

The permitted development on the application lands is fully compliant with the NC zoning objective pertaining to the site, and the additional student accommodation as now proposed is therefore also acceptable in principle in this regard.

SLO41 is complied with through the built architectural form already permitted where the site abuts Kill Avenue and Rochestown Avenue. SLO42 is complied with through the permitted public house on site as well as the 2 no. permitted commercial units which will provide perspective residents and the existing local community with essential neighbourhood retail services. Letters of intent from Commercial Agents and potential commercial operators have been enclosed, to demonstrate the commitment that the Applicant has to the delivery of quality neighbourhood centre facility at this landmark site.

8.2 Student Accommodation

The Development Plan states the council will "*support the provision of on-campus accommodation and purpose built-professionally manages student accommodation off-campus at suitable locations*".

The Development Plan outlines the following regarding Student Accommodation:

Policy PHP29 – Provision of Student Accommodation

> *"It is a Policy Objective to facilitate increased provision of high-quality, purpose built and professionally managed student accommodation in line with the provisions of the National Student Accommodation Strategy (2017). Purpose built student accommodation should be provided on campus or in suitable locations which have convenient access to Third Level colleges (particularly by foot, bicycle and high quality and convenient public transport) in a manner compatible with surrounding residential amenities avoiding overprovision of student accommodation in any one area."*

The subject site is located at a suitable location with convenient access to IADT and UCD. The provision of additional student accommodation based units at the application lands will benefit from easy accessibility to all of the local public transportation options, as well as the myriad of community facilities and services in the area.

8.3 Development Standards

Density

Section 12.3.3.2 of the Plan sets out that as a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. No range, minimum or maximum standard of density is detailed in the Development Plan for the county. However the Sustainable Residential Development and Compact Settlements Guidelines state that when calculating net densities for shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling.

Based on the above, the proposed gross residential density is 188 uph, a marginal increase from the permitted. However, given that the majority of the additional units proposed are contained within the permitted building envelope this density increase is not material to the impact of the site on its surrounding receiving environment.

Car Parking

The County Development Plan does not include specific car parking standards for student accommodation. The proposed development will provide 30 no. car parking spaces within the surface car park. It is noted that there are no proposed amendments to the permitted car parking under SHD Ref. 311411-21 and subsequent compliance agreed.

Bicycle Parking

The Council has cycling standards entitled "Standards for Cycle Parking and associated Cycling Facilities for New Developments" published January 2018. The following requirements for cycle parking apply under the policy guidelines:

Type	1 short stay (visitor) parking space per:	1 long stay parking space per:	Required Spaces	Proposed Spaces
Student Accommodation	5 bedrooms	2 bedrooms	60 visitor + 150 resident Total: 210	330

Table 4 – Bicycle Parking Requirements and Provision

It is noted that there has been no change in bicycle parking spaces a permitted under the parent SHD Ref. 311411-21. This proposed development now before the planning authority proposes the relocation of the permitted bike shelter to the east elevation of Block B – however the quantum of bicycle parking remains. The 330 no. permitted space are considered sufficient to cover the small uplift in units proposed on site, with the broad intent that there will be 1 no. bicycle parking space per bed unit, with the 30 residual spaces more than adequate to cater for the staff and visitor requirements of the commercial units on site as well as short-term visitor parking for the student accommodation. This will be monitored and management by the development's operators, and a bicycle management plan is contained herein for the consideration of the Local Authority.

Open Space

The Development Plan clearly sets out minimum open space requirements for all developments. Notwithstanding, the Guidelines on Residential Developments for 3rd Level Students (Section 50 Finance Act 1999) and the supplementary document produced in 2005 state:

> *"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."*

The subject site is approx. 0.483 ha in size and is therefore limited in the amount of space that can be provided for usable open space at the ground level. Therefore, quality roof terrace spaces will be provided at 4th and 5th floor level for the students to use. These will be approx. 92 sqm and 150 sqm sqm respectively, and as stated previously herein, are considered to be of the correct design and size to balance the needs of the perspective students on site with the operational requirements and standards of a student accommodation development of this scale. The outdoor roof terraces are also complemented by a significant quantum of quality internal amenity spaces for the enjoyment of the student population on site.

Public Open Space

The Development Plan acknowledges that in certain instances it may not be possible to provide the above standards of public open space. The Development Plan outlines the following regarding these instances:

> *"In these instances where the required percentage of public open space is not provided the Council will seek a development contribution under Section 48 of the Planning and Development Act 2000, as amended. The contribution in lieu to be paid for any shortfall in the quantum of public open space to be provided will be used for the provision of improved community and civic infrastructure and/or parks*

and open spaces, in the vicinity of the proposed development for use of the intended occupiers of same."

We note that the applicant is willing to comply with any conditions in respect of development contributions, noting however that a compliance submission has already been agreed with the Council for S48 Development Contributions in respect of the development, which includes a class 1 payment in respect of community & parks facilities. It is submitted that any further development contributions would be reflective of the uplift in the development sought by way of the amendment application only.

Communal Open Space

The Development Plan also acknowledges that in certain instances it may not be possible to provide the above standards of communal open space. The Development Plan outlines the following regarding these instances:

"In very high density schemes (in excess of 100 units per hectare), the Council may seek a development contribution under Section 48 of the Planning and Development Act 2000, as amended, for the shortfall in communal open space provision."

The scheme can be considered to be high density with an overall gross density of 188 uph. Therefore, as noted above that the applicant is willing to comply with any conditions in respect of development contributions, reflective of the uplift in the development sought by way of the amendment application only.

Part V Compliance

This amendment application does not give rise to any requirement under Part V of the Planning and Development Act 2000 (as amended). The parent permission granted under Reg. Ref ABP-311411-21 was expressly permitted as purpose-built student accommodation, a form of development which is exempt from Part V obligations, having regard to Section 96(13) of the Act, which defines the scope of 'housing development' for the purposes of Part V. Purpose built student accommodation does not fall within this definition, as it does not constitute permanent residential accommodation and the proposed amendments herein do not alter the nature, use or planning status of the development in this regard.

As such, there is no material change that would warrant a reassessment of Part V for the purposes of the subject development. This approach is consistent with established planning practice within the administrative county of Dun Laoghaire Rathdown, where comparable student accommodation schemes – both at initial application and amendment stage – have proceeded on the basis that Part V does not apply, an approach that has been accepted by the Planning Authority.

The proposed amendments therefore maintain full consistency with the approved development and with the established interpretation and application of Part V in respect of student accommodation developments.

9 CONCLUSION

We invite the Planning Authority to consider the proposal now put forward in the application documents attached herewith. We note the following key summary points of the proposed development for minor amendments to the previously permitted SHD scheme:-

- An increase in the number of student accommodation units on site from 276 units to 300 units, through the provision of a 436sqm extension to Block A, the reconfiguration of internal circulation and amenity spaces and the internalisation of canopied roof space on Block A.
- Minor architectural redesign and layout reconfiguration of Block A.
- Minor design amendments and alterations to Block B.

The proposed amendments to the development will also include a minor increase to the overall height of both permitted blocks (of c. 550 mm) due to building structure design; as well as minor changes to the scheme as agreed at compliance stage including inter alia the reconfiguration of the central open space area to provide for 30 no. car park spaces (unchanged from agreed compliance); and all associated elevational changes, site development and landscape treatment works necessary to facilitate the proposed development and consequent amendments proposed.

The proposed alterations outlined above do not change the nature or substance of what was approved under the parent permission, will not injure the character of the permitted development or residential amenities of the area, nor the amenities of future residents. It is submitted therefore the proposal is consistent with the proper planning and sustainable development of the area.

We are of the view that there are no major issues arising from the making of this application that cannot be addressed by way of condition in the event of a grant of permission.

Having considered all of the above, we trust that the Planning Authority will make a favourable decision on this application within the prescribed timeframe.