



Proposed Draft Variation (No. 3) of Dublin City Development Plan 2016 – 2022
Section 16.10.7 Guidelines for Student Accommodation

Proposal

It is proposed to vary section 16.10.7 Guidelines for Student Accommodation of the Dublin City Development Plan 2016-2022 as follows:

From “*The applicant will be requested to submit evidence to demonstrate that there is not an over-concentration of student accommodation within an area, including a map showing all such facilities within 0.25km of a proposal*”

To “*The applicant will be requested to submit evidence to demonstrate that there is not an over-concentration of student accommodation within an area, including a map showing all such facilities within 1km of a proposal*”

Purpose of the Proposed Draft Variation

The Proposed Draft Variation arises as a result of the following motion adopted by the Central Area Committee of Dublin City Council at its monthly meeting held in February 2017:

‘That the Dublin City Development Plan 2016 – 2022 Section 16.10.7 Guidelines for Student Accommodation (page 169) be amended as follows:

Change “*The applicant will be requested to submit evidence to demonstrate that there is not an over-concentration of student accommodation within an area, including a map showing all such facilities within 0.25km of a proposal*”

To “*The applicant will be requested to submit evidence to demonstrate that there is not an over-concentration of student accommodation within an area, including a map showing all such facilities within 1km of a proposal*”

Reason: to provide clarity and improved information on the existing and proposed number of students living in the area’

Procedure followed

Public Notice and Public Display

Members of the public were invited to make submissions regarding the Proposed Draft Variation. In accordance with the procedures set out in Section 13 & 20 of the Planning and Development Acts 2000-2010, the Proposed Draft Variation was placed on public display from 29th June 2017 to 26th July 2017 and a public notice was inserted into the Irish Independent.

Copies of the Proposed Draft Variation and amendment, together with SEA and AA screening reports, were made available for inspection at the Civic Offices, Wood Quay,

Dublin 8 within the above listed dates. Details were also available on the City Council's website at www.dublincity.ie.

Strategic Environmental Appraisal (SEA)

The Planning Authority determined, using the criteria set out in Schedule 2A of the Planning and Development Regulations 2001-2004 (as amended), the DEHLG SEA Guidelines and Annex 2 of Directive 2001/42/EC, that a Strategic Environmental Assessment was not required for the Proposed Draft Variation to the Dublin City Development Plan 2016-2022 for the Variation set out above

Appropriate Assessment (AA)

An Appropriate Assessment Screening was undertaken of the Proposed Draft Variation of the Dublin City Development Plan in relation to the amendment of the wording of section 16.10.7, in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). The Proposed Draft Variation is not predicted to have any likely impact on the key features or the conservation function of any Natura 2000 sites.

The prescribed bodies were notified of the above determinations in relation to SEA and AA, and no objections or concerns were received within the appropriate period.

Report on Submissions and observations

The following persons or bodies made submissions or observations in relation to the Proposed Draft Variation of Development Plan:

Sub	Name	Surname	Title	Organisation
1	Natasha	Crudden		Transport Infrastructure Ireland
2	Liz	Marriot	Executive Officer	Department of Education and Skills
3	Cian	O'Mahony	Scientific Officer, SEA Section	Environmental Protection Agency
4	Malachy	Bradley	Assistant Director	Eastern and Midland Regional Assembly
5	Jane	Doyle		Cairn Plc
6	Deirdre	Kirwan		John Spain Associates (for Rialto Student Accommodation DAC)
7	Maude	Ní Bhrolcháin	Administrative Officer	Department of Housing, Planning, Community and Local Government
8	Daniel	Moody	Senior Planning Consultant	Future Analytics Consulting Ltd (for Global Student Accommodation Group and Hines Real Estate Ireland)
9	Aidan	Sweeney	Senior Executive	Ibec
10	Deirdre	Kirwan		John Spain Associates (for Ziggurat ROI No. 1 LP)
11	Pat	McDonnell		Trinity College Dublin
12	Karolina	Pietkiewicz	Housing Project Manager	Union of Students in Ireland (USI)

Issues Raised in the Submissions Received & Chief Executive's Response

1. A total of 12 submissions/observations were received by Dublin City Council in relation to the Proposed Draft Variation.
2. The Department of Housing, Planning, Community and Local Government (Submission 7) welcomes the provision of comprehensive information on the existing extent of student accommodation over a broader catchment as part of the planning application process. It further states that the increase in size of the catchment area will enable more thorough tracking of development locations over time, which will assist in ensuring an appropriate level of student housing is permitted through the development management process.

Chief Executive's Response

The observation is noted, and no change to the Proposed Draft Variation is proposed.

3. Transport Infrastructure Ireland (Submission 1) and Department of Education and Skills (Submission 2) indicate no specific observations in relation to the Proposed Draft Variation

Chief Executive's Response

The observations are noted; no change recommended.

4. The Environmental Protection Agency (Submission 3) notes the position of the Planning Authority in relation to the lack of need for Strategic Environmental Assessment. The submission notes that any future proposed Variation of the Development Plan will also require a determination of likely significant effects on the environment, to take account of the SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004). The submission further notes the SEA WebGIS Search and Reporting Tool that can be utilised to explore, interrogate and produce an indicative report on key aspects of the environment within a specific plan area. Reference is also made to the necessity of appropriate infrastructure being in place to service development proposals.

Chief Executive's Response

The observation is noted; no change to the Proposed Draft Variation is required.

5. The Eastern and Midland Regional Assembly indicates that it has no objection to the Proposed Draft Variation and that the proposal '*may provide improved information on the existing and proposed number of student accommodation developments in the city*'.

Chief Executive's Response

The observation is noted; no change necessary.

6. A number of submissions welcome the Proposed Draft Variation, with various comments:

Cairn plc (Submission 5) states that '*the extension of radius merely highlights the overall under provision of this class of accommodation*'. The need for student housing is highlighted in the submission.

Both Ziggurat ROI No.1 LP (Submission 10) and Rialto Student Accommodation DAC (Submission 6) set out the national need for student accommodation, referencing the National Student Accommodation Strategy, Rebuilding Ireland Action Plan, a HEA report on Student Accommodation Supply and Demand and the Dublin City Development Plan. It states that an assessment of student overconcentration is to be welcomed but that the increase in radius to 1km '*will still not provide an adequate means to addressing student overconcentration in a particular area, if needed*', it is stated that further emphasis needs to be placed on other factors;

- demand for student accommodation in the area and in the city,
- pedestrian/cycle/public transport links to third level institutes,
- proximity to third level institutes
- need to alleviate demand on private rental sector in the area.

The submission sets out suggested amendments to the Proposed Draft Variation to incorporate an assessment of the above factors.

It also sets out the national context for supporting student housing, as well as the Dublin City Development Plan context for same.

Chief Executive's Response

It is considered that the need for student accommodation has been well set out in the submission. The areas indicated in the submission as requiring further emphasis will be assessed on a case by case basis for each application for student housing. This is set out in the general part of section 16.10.7 of the Development Plan; no change recommended.

Global Student Accommodation Group and Hines Real Estate Ireland (Submission 8) sets out the background to housing supply in Dublin and the role and benefits of purpose built student accommodation. The submission includes international examples of how student accommodation is assessed in Edinburgh, Nottingham and Charnwood Borough Council.

The submission identifies that the Development Plan, in stating that an applicant must demonstrate that there is not an overconcentration of student accommodation within an area, does not explicitly state what that area should be.

The submission states that applications for student accommodation should be assessed against other elements including design, zoning, accessibility, quality of accommodation, proximity to HEIs and public transport.

Chief Executive's Response

In relation to the issue of non clarity over what the 'area' is that should be assessed, the report accompanying the public notices states:

A 1km radius equates to an area of 3.1sq.km – which is a substantial area of the city. The purpose of this Proposed Draft Variation is to provide clarity and improved information on the existing and proposed number of student accommodation developments in the area.

Given that different areas and neighbourhoods of the city vary in extent, it is thus clarified that the area to be assessed is that relating to the 1km radius.

In relation to the other elements that should be assessed, it should be noted that these form part of the general section 16.10.7; no change recommended.

7. Three submissions express objections to the Proposed Draft Variation:

Ibec (Submission 9) details the need for Dublin to be able to accommodate students. It also details how, in their opinion, student housing can help to address the current housing problem.

The submission objects to the Proposed Draft Variation, stating that it contravenes proposals under the National Student Accommodation Strategy and the overall objectives of the Dublin City Development Plan. It also states that the Proposed Draft Variation *'would push new student accommodation provision to the outer-peripheries of the greater Dublin area'*

Chief Executive's Response

It is not considered that the Proposed Draft Variation either contravenes the overall objectives of the Dublin City Development Plan or the National Student Accommodation Strategy or that it would result in the relocation of student accommodation to the outer peripheries of the GDA.

The Proposed Draft Variation is not intended to block the development of student accommodation, which is needed in the city. Rather, it is intended to ensure sufficient information is provided to the Planning Authority in order to ensure that student accommodation of an appropriate scale is delivered in appropriate locations. It is not considered that the submission identifies how the Proposed Draft Variation will prevent the delivery of appropriate student accommodation.

No change necessary to the Proposed Draft Variation.

Trinity College Dublin (Submission 11) states that Trinity College Dublin object to the Proposed Draft Variation *'as it will now be even more difficult for applicants to demonstrate compliance'*. It also queries whether the wording should be changed from *'student accommodation'* to *'purpose built student accommodation'*.

Chief Executive's Response

It is considered that the submission has not detailed how it is envisaged that the Proposed Draft Variation will make it more difficult for applicants. The Proposed Draft Variation is designed to provide increased information to the Planning Authority in order to aid decision making and is not intended to act as a barrier to appropriately designed and located student accommodation.

It is also considered that there is no need to change the wording of the Proposed Draft Variation to *'purpose built student accommodation'* as section 16.10.7 adequately sets out that the guidelines relate to purpose built student accommodation.

No change necessary to the Proposed Draft Variation.

The Union of Students in Ireland (USI) (Submission 12) states that it objects to the Proposed Draft Variation *'as it may negatively impact on the mainstream delivery of PBSA underpinned by the national and local policies across Ireland'*. It states that *'the proposal is not informed by evidence on over-concentration of student accommodation, which would be relevant for assessing the purpose of the Proposed Draft Variation'*.

Chief Executive's Response

It is considered that the need for PSBA has been well set out in the submission. However, it is not considered that the claim that the Proposed Draft Variation will negatively impact on delivery of student accommodation has been demonstrated. As is

indicated in the public consultation for the Proposed Draft Variation, the purpose of the Proposed Draft Variation is to provide clarity and improved information on the existing and proposed number of students living in an area. This will enable the better delivery of appropriately scaled and located student accommodation in the city. It is not intended to act as a barrier to same. It should be further noted that the submission appears to incorrectly interpret the map radius to be related to third level institutions rather than the subject site of the proposed student accommodation.

No change necessary to the Proposed Draft Variation.

Recommendation to City Council

Having regard to the submissions received and to the Chief Executive's Response to the issues raised therein, it is recommended that the City Council adopt the Proposed Draft Variation (No.3) of the Dublin City Development Plan 2016-2022.

Dated this day the 23rd of August 2017.

Richard Shakespeare
Assistant Chief Executive