
Neasa Hourigan TD, Cllr. Janet Horner,
Leinster House, Kildare Street
Dublin 2

Dublin City Council,
Civic Offices, Wood Quay
Dublin D08 RF3F

18th April 2024



Re: LRD6050/24-S3, planning application at former IDA Centre, Prussia Street,
Dublin 7.

Dear Sir/Madam,

We wish to submit an observation on the above planning application.

It is important for local residents that the site is developed in a manner appropriate to the location. We have outlined our concerns with this application below, and have submitted the required fee.

Kind Regards,



Neasa Hourigan TD, Dublin Central

Cllr. Janet Horner, North Inner City

Observations

Over concentration of student accommodation

There is a pressure on residential accommodation across all tenure types (owner occupied, rental, student accommodation, etc.) in Dublin. We have seen landowners in the city gravitate towards the more profitable tenure types (student accommodation and build to rent). Our preference would be for a mixed use development according to the development plan which should have an emphasis on creating lively, vibrant urban villages

The land is zoned “Zone Z4 – Key Urban Villages/Urban Villages” which promotes:

“Mixed-Use: Promote an increased density of mixed-use development including residential development with diversity in unit types and tenures capable of establishing long-term integrated communities.”

and is adjacent to a primarily “Z1 Sustainable Residential Neighbourhood” zone.

We would argue that the existing concentration of student accommodation in the immediate vicinity means that there will be an overconcentration of Student Accommodation in the area.

In the area we have:

1. 84-87 Prussia Street - 203 beds
2. 42-45 Prussia Street - 584 beds
3. 29b, 30 and 31 Prussia Street - 236 beds
4. Nos. 1-2a Manor Street - 142 beds (not included in the applicant’s Estimate of Supply of Purpose-Built Student Accommodation)

And 373 beds from the applicant's development totalling 1,538 in this small area. This is 30% of the circa 5,082 no. additional PBSA bedspaces have been granted planning permission or constructed in Dublin since 2016.

30% of the bed spaces along one street surely represents an overconcentration.

The development plan states that “In assessing proposals, the planning authority will have regard to the pattern and distribution of student accommodation in the locality, and will resist the overconcentration of such schemes in any one area...”

Overshadowing

We have spoken with a number of residents from Stanley Court who, while happy that the site is to be developed, are unhappy with the degree to which Block 1 overlooks their dwellings.

The developer's guiding principle seems to have been how to cram as many beds into this development as possible with scant regard for the neighbouring properties.

The Development Plan is clear that *"Access to daylight is vital for our health and daylight is the only true source of sustainable light. (p.392 Ch.16)"*

There are a number of concerns we would have with the development

- Annual Probable Sunlight Hours - 11 assessed neighbouring points having a major impact under the BRE guidelines
- Vertical Sky Component - 6 assessed points neighbouring points having a major impact under the BRE guidelines
- The residents have indicated that some points assessed in the sunlight analysis are not windows rather they are french doors/balconies. These we feel should be treated differently given the light they bring into a dwelling.
- In addition to the residents there is a community based Child and Family Project, Aosóg, based on the ground floor. As for the residents, daylight is important for these users of the building. It does not seem that these windows were assessed as part of the Sunlight and Daylight Access Analysis.
- In addition to loss of daylights, Stanley Court residents have concerns about loss of privacy given the proximity of Block 1 to Stanley Court.

Community gain

Given the size of the development we are disappointed that it does not include any material element of community gain. A small café is provided but there is already an established café at 66 Prussia Street and a number of other cafés in Stoneybatter more generally.

Student accommodation terms

Student accommodation development standards differ (e.g. relaxed standards in relation to dual aspect) from other tenure types. This is done given the “given the nature of student occupancy” i.e. students are generally only resident during term time.

We note however that some student accommodation providers have moved to 51 week leases. The providers want to benefit from the relaxed standards while at the same time tying students into full year leases at high market rates (circa €1,200 per month).

We are aware that the Minister for Higher Education has been in touch with local authorities about this practice¹ and plans to legislate.

We would ask that a condition of any grants be that leases must match term time.

Traffic management

Bin trucks, café deliveries and term turnaround

While provisions have been made in the plan for bin trucks, café deliveries and the increase in student movements around term changeover time we have concerns about how these will be policed.

Given that Prussia street is a key artery to the city for pedestrian, cycle, vehicular and public transport our concern is, as happens elsewhere, that these provisions will be ignored.

Permeability

No consideration seems to have been given to the permeability of this plot. An enhanced pedestrian network is part of the aim of the key urban village.

QHSN21 *It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.*

¹ <https://www.thejournal.ie/51-week-leases-student-accommodation-6313308-Feb2024/>

Footpath width

In the interests of providing adequate pedestrian space it would be preferable if the front of the development aligned with the Unit 2, Stanley Court rather than sticking out slightly as it does.

Asbestos

We note that:

- That no asbestos was found as part of the Basement Impact Assessment sampling or the Asbestos survey referenced in the Construction Management Plan.
- That the Construction & Demolition Waste Management Plan states that *“waste will undergo a comprehensive waste assessment and classification by a suitably qualified person”*

Nonetheless, given the age of the building and nearby residential properties, we would ask that:

1. The Asbestos survey referenced in the Construction Management Plan be published.
2. a condition be put on any grant of permission that local residents be informed should asbestos be found on the site.