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**Student Accommodation Concentration Report**  
**Dublin City Development Plan Compliance Report**

**for**

**Mixed – Use Redevelopment Scheme  
including  
Student Accommodation**

**at**

**Park Shopping Centre  
Prussia Street  
Dublin 7**

**for**

**The Park Shopping Centre Limited**

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## **Purpose of Report**

The purpose of this report is to address the provision and requirements of the Dublin City Development Plan (DCDP) 2016-2022 in relation to the distribution of student accommodation.

The Government has identified student accommodation as a discrete form of residential accommodation and has made specific provision for it in amendments to the Planning Act.<sup>1</sup>

This report has been prepared to:-

- Provide a policy context and analyse the demand for student accommodation in Dublin City;
- Address the future development of student accommodation, primarily to serve the new university campus in Grangegorman;
- Provide a justification for the provision of student accommodation on the subject site.

Notwithstanding the current hiatus caused by Covid 19, the report relies on surveys, policy and strategies that have not been altered since the arrival of the virus in Ireland in 2020.

## **Dublin City Development Plan – Variation 3**

The Dublin City Development Plan (DCDP) was subject to Variation 3 in 2017. The text of the DCDP now indicates in relation to Purpose Built Student Accommodation proposals – *‘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’.*

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<sup>1</sup> For the purposes of the Planning and Development (Housing) and Residential Tenancies Bill 2016, an Act to amend the Planning and Development Acts 2000 to 2015, the Residential Tenancies Acts 2004 to 2015, the Local Government Act 1998 and the Housing Finance Agency Act 1981, “student accommodation” means non-permanent residential accommodation for students or related to a Higher Education Institute which shall not be used for the purposes of permanent residential accommodation, as a hotel, hostel, apart-hotel or similar but which may be used as tourist/visitor accommodation only during academic holiday periods.

The purpose of the Variation was explained as follows: -

*The current Dublin City Development Plan includes policy: “to support the provision of high-quality, professionally managed and purpose built third level student accommodation on campuses or in appropriate locations close to the main campus, in the inner city or adjacent to high-quality public transport corridors and cycle routes, in a manner which respects the residential amenity and character of the surrounding area, in order to support the knowledge economy. Proposals for student accommodation shall comply with the “Guidelines for Student Accommodation” contained in the development standards” (QH31).*

*The value of Purpose Built Student Accommodation (PBSA) is evident in providing good quality housing while removing potentially thousands of students from the open private rental market, and PBSA should continue to be supported as per current planning policy and in accordance with the guidance.*

*The Planning Authority’s approach will continue to be monitored over time to steer PBSA into appropriate locations and to prevent overconcentration of student housing in certain areas. PBSA should not be encouraged in areas not well connected to third level institutions by public transport / cycling / walking.*

*It is considered that the study area of other student accommodation facilities, at 0.25km, is too narrow and it is now proposed to extend that study area to within 1km of the subject site of applications for PBSA*

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

This report takes this Variation into account.

### **Role of the Private Sector in PBSA**

Generally, it was anticipated that student numbers will continue to increase in the coming years and this will lead to an increase in demand for PBSA.

This demand has brought global student housing specialists to Dublin, with the world's leading global investors in PBSA investing heavily here. These providers also have excellent expertise in management of PBSA facilities. A number of international players with specialist experience have come to Ireland to build and operate sustainable student housing accommodation.

Based on the data available in 2017, approximately 18% of full-time students in Ireland were accommodated in PBSA. This figure was low by international comparisons with the equivalent figure for the UK published by Higher Education Statistics Agency (HESA) being c. 27%.

There is a requirement for investment from both publicly funded HEIs and private developers to seek to comprehensively address the identified shortfall in PBSA. The HEA statistical publication for 2014/2015 demonstrated that there were 81,566 full-time students enrolled in HEIs in the Greater Dublin area out of the total of 173,649 full-time enrolments nationally. This equates to 47% of the total full-time enrolments and shows why the main concentration of PBSA development is centred on the Greater Dublin area.

### **Progress on delivery of Purpose Built Student Accommodation (PBSA)<sup>2</sup>**

The year-end 2017 figures showed a total of 15,902 bed spaces either completed or in the planning and development process.

By the end of 2018 this figure had risen to 19,293.

By the end of Q3 2019 the total potential figure had risen to 23,649.

As of the end of Q3, 2019<sup>3</sup>, a total of 8,229 bed spaces had been completed. Plans are approved for an additional 7,771 bed spaces, representing a total of 21,254 bed spaces either complete, under construction or with plans granted at the end of Q3 2019, implying

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<sup>2</sup> Quarter 3 2019 Progress Report on the National Student Accommodation Strategy, October 2019.

<sup>3</sup> The last published Quarterly Report is Q3 2019, entered on web page January 2020.

2395 submitted for planning permission but not determined (23,649 – 21,254). A substantial proportion of these bedspaces are located in Dublin.

Comment - Note that: -

- Not all permitted developments reach the construction stage. Student accommodation bed space provision completion in Dublin City Centre 2016 – 2019 was 5,097 bedspaces;
- The pace of construction of PBSA has stalled in 2020 since the effects of Covid 19 upon international travel and 3rd Level Education Institutions. However, plans for development of the unified campus at Grangegorman have not changed.<sup>4</sup>

### **Dublin City Council Research**

In 2019, Dublin City Council commissioned a report on the Social, Economic and Land Use potential impacts of PBSA in the Dublin City centre administrative areas<sup>5</sup>. Some of the information and conclusions from this report are summarised below: -

- The Government's Rebuilding Ireland Action Plan underlines the importance of providing well designed and located student accommodation to meet growing demand and avoid additional pressures in the private rental sector (PRS) (standard housing);
- At present there are 76,381 full time students enrolled in HEA-aided third level institutions in the Dublin area, with >53,000 students enrolled in the ten third level institutions (HEA-aided and private) within the canals of Dublin City;
- The National Student Accommodation Strategy, published in May 2017, sought to ensure that there is an increased level of supply of Purpose Built Student Accommodation (PBSA) to reduce the demand for accommodation in the private rental sector by both domestic and international students attending Higher Education Institutions (HEIs). This identified the key target of the construction of at least an additional 16,374 PBSA bed spaces to provide an overall supply of 28,806 PBSA bed spaces in the Dublin area by 2024;

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<sup>4</sup> GDA Newsletter Q4 2020 - A Year We'll All Remember GDA CEO Ger Casey looks back on 2020

<sup>5</sup> Social, Economic and Land Use Study of the Impact of Purpose Built Student Accommodation in Dublin City; DCC; EY; Coyne Research Feb 2019

- It is a policy of the Dublin City Development Plan 2016-2022 to support the provision of high-quality, professionally managed and purpose built third-level student accommodation on campuses or in appropriate locations close to the main campus, in the inner city or adjacent to high-quality public transport corridors and cycle routes, in a manner which respects the residential amenity and character of the surrounding area, and in order to support the knowledge economy;
- There are approximately 6,364 PBSA bed spaces currently operational within the canals of Dublin city centre, growing to over 9,000 operational by 2020, given the number under construction at present;
- There is the potential for a total of approximately 14,000 PBSA bed spaces to be available for students by 2024, given the number of PBSA bed spaces approved and in the planning process at present;
- While PBSA bed space provision in the Dublin City Council area is on track to meet the NSAS supply target, this would address only one third of the predicted demand for PBSA bed spaces by 2025 in the Dublin area, estimated at over 50,000;
- Interviews with students residing in seven PBSA facilities across Dublin found that 79% of those surveyed were international students;
- With regard to the impact of PBSA on the local community, the consensus amongst stakeholders was clear - PBSA has a positive impact;
- In general it is considered that any negative impact associated with the rise in the number of students in a particular area is outweighed by the positive impact regarding expenditure, engagement and regeneration;
- A review of PBSA developments in Dublin City has found that these developments had resulted in benefits to the local environment, including the renewal of vacant and underutilised sites, the restoration and reuse of historic buildings and increased pedestrian linkages;
- The research also found that the majority of students in PBSA used local services and facilities regularly and 15% worked or volunteered locally;
- International comparisons indicate that Dublin has a relatively low proportion of students accommodated in PBSA, with approximately 16% of the student population accommodated in PBSA in 2018 compared to approximately 38% in Edinburgh;

- As recognised in the planning policies of other international cities, a major advantage of purpose built student accommodation is that that purpose-built and well managed schemes reduce potential issues such as antisocial behaviour, compared to the widespread conversion of family housing into shared student properties which are more difficult to manage;
- The use of a criteria policy for PBSA developments, including topics such as amenity, character, appearance and management, allows for consideration of impacts on a site-by-site basis. This allows each case to be considered on its own merit;
- By developing and utilising an appropriate Management Plan for PBSA, the managers of PBSA can minimise any potential negative impacts from the PBSA developments and their occupants on surrounding properties and neighbourhoods. It also means that a positive and safe living environment can be created for students as well as acting to develop and enhance the neighbourhoods in which they are situated for the betterment of the whole community;
- There is a significant contribution to the economy of the local shops and services - increased footfall and expenditure have led to the opening of new businesses in the locality of PBSA;
- In general it was considered that any negative impact associated with the rise of the number of students to a particular area is outweighed by the positive impact regarding expenditure, engagement and regeneration.
- 65% of all residents walked to college/university. Therefore, proximity is key from a planning perspective;
- In terms of the market for language schools, student numbers in 2017 increased to just under 130,000 from 120,000 in 2016;
- The development of PBSA in Dublin City Centre has impacted positively in terms of regeneration, many being built on underutilised sites in areas that would have not been otherwise developed;
- The PBSA sector is a necessary component of the residential stock of the city and it has not forced out private residential development in instances where the sites were already vacant and underutilised for a considerable number of years.



### **Residential Tenancies (Amendment) Act 2019**

The affordability of accommodation is a vital element in ensuring access to third level education for all of our students. The Residential Tenancies (Amendment) Act 2019 provides rent predictability for students living under licence in PBSA, and their parents, by including registered students residing under licence arrangements in PBSA during term-time, under existing Rent Pressure Zone provisions. The provisions came into effect for licenses commencing from the 15th August 2019.

### **Student Accommodation in GDA SDZ**

The GDA SDZ planning scheme provides for the provision of c.2,000 student accommodation spaces on the campus. This accommodation provision has been taken into account. It should be noted that the SDZ planning scheme has the status of a development plan for the campus, it does not constitute a planning permission for all elements in the scheme. It is necessary to apply for and receive permission for the elements of the scheme. To date there has been no planning application submitted, or permission procured for the construction of 2,000 student accommodation bedspaces in the GDA campus. It is noted in the National Student Accommodation Strategy (2017) that the first phase of development will involve the creation of 700 bed spaces, however, no planning application has been submitted for these bed spaces to date.

The quantum of SDZ scheme bedspaces will not meet the local requirement for student accommodation when the campus is complete.

### **New Student Accommodation – West of Grangegorman**

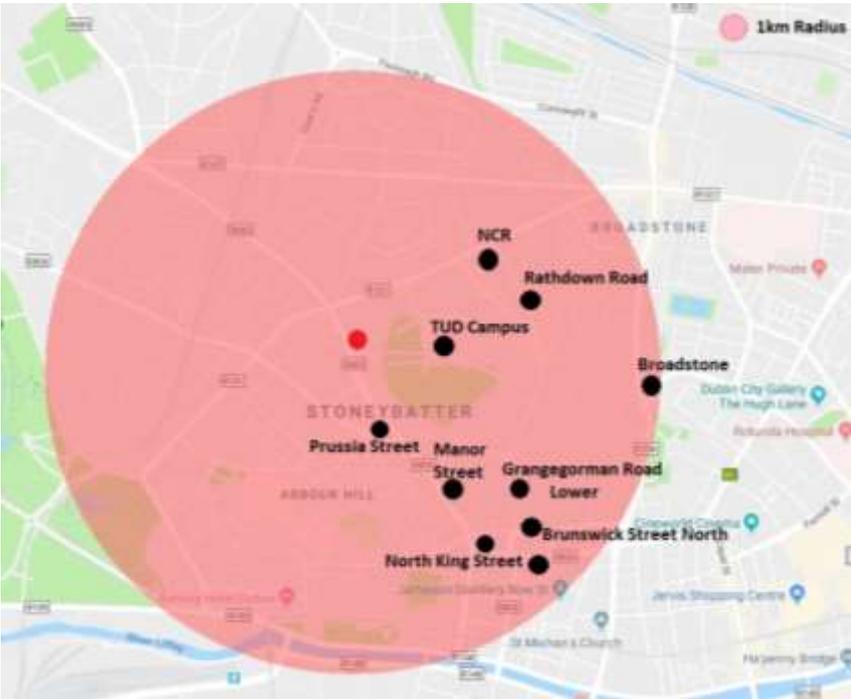
Balark Trading GP Limited received planning permission in 2019 for amendments to a previously approved (Ref.4035/16) student accommodation scheme consisting of 193 no. student bedspaces on the west side of Prussia Street. Construction work on this site was suspended in 2020.

The second permitted student accommodation scheme is on the subject site where permission was received for 485 no. student bedspaces. The proposed development will provide a total of 584 no. bedspaces (an additional 99 no. student bedspaces).

Other recent permissions for student accommodation in the area are located on the North Circular Road and on Rathdown Road, to the north of the campus.

The campus accommodation will not affect the neighbourhood balance in the northwest suburbs of Dublin City.

The location of the proposed development and the location of other permitted and proposed student accommodation proposals have been mapped, as shown below.



**Fig. 5 Student Accommodation Concentration Map**

**Relevant Planning Permissions**

**Ref. 2038/17**

Planning permission granted for the demolition of Park Shopping Centre and nos. 42-45 Prussia Street, Dublin 7, which in respect of student accommodation, included: -

*Construction of student residential accommodation overhead the district centre buildings (15 no. student houses accommodating 105 no. student residential units and 541 bedspaces) in two buildings ranging from 2 to 6 storeys over ground floor commercial north side and 4 to 6 storeys over ground floor commercial south side of a new pedestrian and bicycle street connecting Prussia Street to the Grangegorman SDZ.*

The number of student bedspaces in the permitted development was reduced to 485.

**Ref. 4035/16 – parent permission (nearby)**

Planning permission granted for rear of 84-87 Prussia Street for demolition of the existing vacant single storey commercial building and the construction of a student accommodation development with 203 no. bedspaces in 32 no. student accommodation units.

**Ref. 2683/19 – amendments to permitted student accommodation scheme (nearby)**

Planning permission granted for amendments to previously permitted development Reg. Ref. 4035/16 on a site of c.0.5 hectare site located at and to the rear of 84-87, Prussia Street, Stoneybatter, Dublin 7.

The amendments comprise of alterations to the permitted development of 193 no. student accommodation bed spaces.

**Proposed Amended Redevelopment**

In summary, the redevelopment of the site, as regards student accommodation, will consist of:-

*Student residential accommodation overhead the District Centre accommodating 11no. student houses comprising 143no. student apartments( including 28no. studios), with a total of 584 bedspaces (556 bedrooms) and associated balconies;*

- The North Building student residential accommodation has reception and student amenities (conciierge, café, lounge areas) at ground, mezzanine and first floor levels, with access to all levels overhead and a first floor level podium garden from which student apartments and student amenity areas (study centre, a recreation centre and laundry) are accessible; 2 no. amenity terraces with pergola structures at fourth floor.*

- The South Building student residential accommodation has ground floor level foyer with access to all levels, staff rooms, fitness centre at ground and mezzanine levels and a first floor level podium garden from which student apartments are directly accessible.*

The proposed student accommodation will add 99 no. bedspaces to the number in the permitted development (2038/17) at the same location.

### **GDA Research**

GDA commissioned RPS to carry out a study of the potential for ‘*studentification*’ of the north west suburbs due to the ingress of students and to make recommendations to assist with the integration of students into the Grangegorman Area<sup>6</sup>. Dublin is regarded as a large city capable of absorbing students to a greater extent than some small university cities in the UK where studentification has become an issue.

### **PBSA Industry Research**

The professional student accommodation developers providers, who met as a group at the DCC Convention Centre on 6<sup>th</sup> April 2017<sup>7</sup>, have noted specifically in relation to TU Dublin Grangegorman campus that: -

- 4,000 DIT (TU Dublin) students were already occupying rental properties throughout the city;
- The tendency, with a concentrated campus at Grangegorman, is that these students will gravitate to the D1 and D7 Districts to be close to their college.
- The high level (Government) decisions to concentrate the campus at Grangegorman will have an inevitable influence on the choice of location for accommodation by students in the future.

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<sup>6</sup> Grangegorman Strategic Development Zone Report on Student Integration in the Grangegorman Area; January 2016; RPS Planning and Environment

<sup>7</sup> The Class of 2020 seminar held in Dublin Civic theatre on 6<sup>th</sup> April 2017 brought together the key stakeholders of the Irish student housing sector. *Accommodation issues limiting Ireland’s international student growth*. Posted 19 04 2017.

## **Policy Response**

After Variation 3, the current Dublin City Development Plan includes policy to support the provision of high-quality PBSA on campuses **or in appropriate locations close to the main campus, in the inner city or adjacent to high-quality public transport corridors and cycle routes**, in a manner which respects the residential amenity and character of the surrounding area, in order to support the knowledge economy. (Emphasis added - bold)

Policy in the Dublin City Development Plan requires demonstrably good management of PBSA. Therefore, early provision of PBSA close to the campus will serve a demand that will inevitably arise in the area and will reduce pressure for competition from student accommodation providers in the ‘standard’ residential accommodation market.

## **Overall Context**

In summary, the proposed student accommodation is at the closest possible location to the new TU Dublin campus being located on and within the boundary wall.

The overall development is significantly complementary to the GDA campus – one will benefit from the other, while at the same time adding significantly improved infrastructure, services, accommodation and access for pedestrians, cyclists and public transport users from the west and north-west suburbs into the campus.

The addition of the significant number of student residents will animate the area, will increase the use of the GDA campus recreational and parkland facilities at times when non-resident students have left and will make the place safer by their presence and passive surveillance.

The proposed student accommodation is consistent with Government policy and DCC policy, including Variation 3 and will not give rise to an over-concentration in the north-western suburbs where the new campus is located, being located in an appropriate location close to the main TU Dublin campus, in the inner city and adjacent to high-quality public transport corridors and cycle/pedestrian routes.

A higher ratio of students can be accommodated in PBSA in a locality where there is a 3<sup>rd</sup> Level Institution without negative social effects, where the PBSA accommodation is localised close to the Institution as it is in the current case.

The overall addition of student accommodation above that already permitted on the subject site is 99 no. bedspaces at this location in D7. This will not give rise to an overconcentration of student accommodation provision in this part of the city

**Simon Clear**

**March 2021**