

Statement of Response to LRD Opinion

Proposed Mixed-Use Development

139-149 North King Street

Dublin 7



Applicant

Ringline Investments Limited

April 2025

Introduction

Following pre-application consultations with Dublin City Council, the LRD Opinion for the proposed Mixed-Use development at 139-149 North King Street was issued in November 2024 under Ref. LRD6071/24-S2.

The Opinion states that 'following consideration of the issues raised during the LRD meeting the Planning Authority is of the opinion that the documents submitted in accordance with Section 32B of the 2021 Act requires further consideration and amendment to constitute a reasonable basis for an application for Large-scale Residential Development.

In the event that the applicant proceeds to submit a planning application, the applicant is advised that the LRD application should be accompanied in the first instance by:

- *Statement of response to the issues set out in the LRD opinion*
- *Statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area*

Planning Issues

a) The applicant shall provide sufficient demonstrative visuals/views of the scheme particularly from the northern end of Smithfield Square and adjacent housing estate. Also views to be provided from Bow Street and Nicolas Avenue.

Response

Additional verified photomontages from the above locations have been prepared by Digital Dimensions and are enclosed. In addition to the verified photomontages, a Landscape and Visual Impact Assessment has been prepared by Mitchell and Associates, Landscape Architects.

b) The height of scheme to rear shall be reviewed – a strong justification is required.

The existing building heights in the immediate surrounding area vary greatly from 6-storeys on the opposite side of North King Street and Bow Street, to 3-storey along Brown Street North and 2-storeys to the rear and southeast of the site. All of these surrounding heights have been taken into consideration in the design of the proposed development.

The proposed development is the redevelopment of most of a defined urban block (excluding the south east corner) in the city centre, to be considered in the context of other urban block redevelopment in the vicinity, along North King Street and Smithfield Square and adjoining streets extending to Queen Street, where comparable juxtapositions to those at the rear of the site occur and taking into account the latest Government Guidelines - Sustainable and Compact Settlement Guidelines 2024.

The current 2-storey scale on the site does not provide an efficient density for redevelopment at the subject location within the canal ring of Dublin City on core city centre Z5 zoned lands. The predominant redevelopment, regeneration and infill height along this section of North King Street is 6-storeys and this has been reflected in the proposed development.

The proposed building has a setback at 5th floor level to facilitate a roof terrace along Brown Street North and a more significant setback at the 6th floor level, which results in the building presenting as 6-storeys from street level on North King Street. Full details of compliance with the height guidance in the DCDP and National Guidelines, such as the Urban Development and Building Heights Guidelines for Planning Authorities (December 2018), is included in the enclosed Planning Report and Statement of Consistency prepared by this office.

Following pre-application consultations, the architectural design of the building was reviewed and adjustments have been made to fenestration to improve the solid to void ratio and high-quality materials, which is predominantly brick, have been chosen.

Overall it is submitted that the proposed development has been designed to fit into the existing height context whilst also providing sustainable redevelopment of an underutilised site in a key city centre location.

c) Consider increasing size of above ground/00 floor level street-facing windows (while maintaining a vertical emphasis) and/or using some form of banding to make scheme less potentially institutional-looking (solid to void ratios). Also to supply higher quality imagery/examples etc to demonstrate the intended level of articulation and detailing across public elevations.

Response

The fenestration has been adjusted and revised Verified Views have been prepared by Digital Dimensions. The window sizes have increased with vertical emphasis and a louvre system has been introduced to reduce the extent of glazed openings. Details of the proposed materials and the revised windows are included in the enclosed Architectural Design Statement.

d) Brick shall be used as primary finish on all new elevations – with overall a limited palette of high-quality materials to be used throughout the scheme. Service doors and other external fittings shall be finished/treated to blend with their host finish as best as possible.

Response

Brick is proposed as the primary finish with a lighter brick proposed on the upper levels to distinguish between the weight of the historic datum and the lightness of the upper contemporary proposal. Metal is proposed to clad the upper level to provide a strong division on the King Street North elevation (mid-levels), which has the effect of de-constructing the massing. Further details on the materials are provided in the Architectural Design Statement.

e) Any signage shall be well designed

Response

Indicative signage is shown on the elevations and further details may be agreed by compliance with conditions/subsequent permission.

f) Ventilation/extraction systems for café type use etc shall be designed into the scheme in the interest of future-proofing.

Response

Cafe ventilation requirements have been accommodated into the main risers (internally), with no significant impact to the historic facade. This will preserve the historic facade and future-proof the building.

g) Any roof plant should be designed to be below parapet level, with consideration of future potential telecom antennae add-ons to be accommodated into the final built form.

Response

This requirement is noted and has been adhered to in the design of the proposed development.

h) While overlooking/separation distances to 3rd party sites may be achieved the applicant should consider angling windows and/or treat to minimise overlooking cones in relation to adjoining existing residential housing.

Response

Overlooking mitigation includes the introduction of ventilation louvres on student accommodation windows. This reduces the viewing angle, relative to an open window, and also reduces the potential noise impact.

i) While not a traditional residential scheme obviation measures should be applied on inside corners where opes are in close proximity to each other.

Response

Internal window proximity has been considered and optimised where possible. Internal blinds will be used to screen and reduce the impact of privacy.

j) 5% cultural/arts/community floorspace as per CU025 of the Development Plan shall be provided.

The proposed development has a net internal area of 8,296m², which falls below the threshold for the requirement to provide 5% cultural/arts/community floorspace as per CU025. There is precedent under DCC Ref.LRD6050/24-S3 (ABP-319847-24) for objective CU025 applying to the net floor area and not the gross floor area. This granted permission was also for student accommodation. It is submitted that this applies in this case and therefore there is no requirement to provide 5% cultural/arts/community floorspace. Notwithstanding this, an exhibition space of c.257sqm has been designated at ground floor in the reception area and this space may be utilised to display the architectural, industrial and social history heritage of the site. The ground floor also accommodates a 117sqm corner retail unit, Student Gym, Library,

Yoga, Games area, Laundry and bike storage facilities. It is proposed that the library space would be a multi-purpose space and would be available to book for community uses.

k) Further enlivening of the ground floor elevations shall be considered in the interests of vitality of the local streetscapes.

Response

The ground floor activities have been thoroughly considered in the context of street activation and passive surveillance. Large windows provide views into Yoga studios, Gym, Library and Reception and exhibition areas. The bike storage area is designed with a mesh - allowing views through to the internal landscaped courtyard.

l) The applicant is advised to liaise with AirNav Ireland if installing solar panels over 300sqm.

Response

This requirement is noted, however, the proposed development only includes 140m² of solar panels.

Conservation

a) The proposed building would be overbearing on the protected structure and established scale of the surrounding buildings, and the CO recommends that this shall be reduced by one floor between levels 2-5, which would be more sympathetic to the scale of the protected structure and provide a more appropriately scaled intervention to the streetscape.

Response

The height of the proposed development has not been reduced. The scale of the building, relative to the protected structure, has been carefully considered, and articulated by deconstructing the massing into smaller elements, defined by historic datum, form and materials. Further details for the justification of the proposed building height are included in response to

Item 1b) above, within the Planning Report and a Landscape and Visual Impact Assessment has also been carried out.

b) The proposed materiality of the new construction at the upper floors appears heavy and overbearing on the protected structure below, and in some images the colour of the brick appears to be inharmonious with the warmer tones of the extant historic brick of the protected structure. The CO also recommends that the elevational treatment be reconsidered to provide a better balance of solid and void, as the size and proportions of the window appear small and narrow. Additionally, the CO recommends that the rhythm of the fenestration on the north, east and west facades be reconsidered to more consistent with the established fenestration pattern on the protected structure and surrounding buildings.

Response

The materials of the upper levels have been articulated to provide a juxtaposition between the earthy historic base 'plinth' and the upper contemporary light-coloured brick. The facade has been detailed to provide a high level of articulation, both in terms of materiality and relief. Recesses and projections animate the facade throughout the day adding variation and dynamics to all elevations. The windows have been revised to accommodate a louvred panel, which alternates in position for each level - further animating the facade.

The Bow Street elevation of the historic wall has been rendered and it would be detrimental to the historic fabric to attempt to significantly amend this elevation. The proposal therefore retains the render. During construction, investigations will confirm the type and extent of the render to determine the best conservation strategy. If cementitious render is confirmed, it is proposed to removed this render carefully and replace with lime render.

c) It is recommended that the proposed new openings in the Bow Street elevation at first floor level be reconsidered to respond more sympathetically in shape, height and layout to the existing fenestration pattern on the facade.

Response

The elevation on Bow Street has been amended and is more sympathetic to the historic façade. Please refer to the revised elevations enclosed for details.

d) The CO requests that the proposed finishes for the Brown Street elevation be clarified, as the Verified View appears to show a rendered finish, whereas the Design Report and drawings appear to show brick. Details of how the new construction meets and complements the protected structure shall be provided. The CO is of the opinion that the junction of the Brown Street elevation at ground and first floor, the protected façade on North King Street and the new construction above requires some design development in order to provide a more harmonious design at this prominent corner.

Response

Brown Street North elevation is proposed to be brick at ground and first floor, to form a visual 'plinth' - unifying the historic King Street North elevation with the new proposed elevation. The detailing of the bricks is similar to the upper levels facing King Street North, with a more earthy tone to the lower levels. The verified views have been updated and reflect the proposed materials.

e) The CO requests that a more detailed survey of the extant historic fabric internally shall be carried out, and the AHIA should include a conservation-led methodology outlining the preservation of any remaining historic fabric at basement level, which the CO understands is currently lined with modern plasterboard. Additionally, a more thorough investigation into the age and construction stages of the historic front façade is requested in order to gain a clear understanding of the extant historic fabric of the protected structure and the stages of its construction.

Response

An Architectural Heritage Impact Assessment Report (AHIA) has been prepared by Michael O'Boyle, Grade 1 Conservation Architect, and is enclosed. The AHIA provides an overview of the historical background of the existing buildings on the site, details the façade and interior of the buildings and assesses the significance of the existing buildings. The impact of the proposed development on each element of the protected structure is detailed and an assessment of the

visual impact of the proposed development is also included. A number of mitigation measures are recommended, which can be conditioned to be complied with on receipt of a grant of planning permission.

f) The CO requests that a detailed design for the shopfront on both North King Street and Bow Street be submitted, taking into account the evidence of the historic shopfront. The applicant shall consider in greater detail the elevation of the retail unit to Bow Street. There are three modern windows at ground floor in the unit, which are unsympathetic additions to the historic façade and do not complement the existing fenestration patterns of the protected structure. The CO would support carefully considered, conservation-led modifications to this portion of the façade which would enhance the character of the streetscape and conservation area and provide a more harmonious treatment to the retail unit elevation at this corner.

Response

Further investigation is required during construction to distinguish the historic fabric from the modern interventions. It is proposed to return the King Street North elevation to a historically accurate state, while removing the modern window interventions of Bow Street.

Archaeology

a) In the interest of preserving or preserving by record archaeological material likely to be damaged or destroyed in the course of development, given the location of the site within the historic City (RMP DU018-020), it is likely that the development would necessitate an archaeological excavation with preservation in situ/presentation and interpretation of significant archaeological remains.

Response

This is noted and a project Archaeologist was appointed to carry out a preliminary Archaeological Assessment for this stage of the planning application process. Please refer to the enclosed report prepared by Archaeology and Built Heritage.

b) It is essential that an archaeological assessment with a detailed impact statement is prepared and submitted with the S3 application. This is in accordance with the City

Development Plan 2022-2028 standards and policies. Where feasible it is strongly recommended that the subject site be subject to archaeological testing preferable in advance of the decision.

Response

As noted above, an Archaeological Assessment has been prepared by Archaeology and Built Heritage and is enclosed with the planning application documents. Due to the existing building being actively used it was not feasible to carry out archaeological testing prior to the submission of the planning application.

c) A battlefield analysis should be prepared by the site by a recognized expert on the subject. The built heritage and archaeological assessments should incorporate the analysis of the battlefield site and make recommendations in relation to the preservation of associated fabric, its recording heritage and its interpretation.

Response

A Battlefield Assessment has been prepared by Franc Myles of Archaeology and Built Heritage and is enclosed. The author is an expert on the subject and Archaeology and Built Heritage surveyed the area as part of a project recording physical evidence of the rising in the contemporary city (Where was Clarke's Dairy?). Please refer to the enclosed reports for further details.

d) A detailed historic building survey of the factory building is required by a suitably qualified architectural historian/industrial archaeologist (see Level 4 Historic England). The survey information should be analysed to determine date/phasing and address the social and industrial significance of the building remnants and the impact of the proposed building.

Response

A Historic Building Survey has been prepared by Archaeology Plan and is enclosed.

e) The findings of the above reports should be reviewed by the design team and be utilised to inform appropriate modifications to the final design and may preclude some aspects of the proposed demolition.

Response

The above reports were reviewed and taken into consideration by the design team.

Parks, Biodiversity and Landscaping Issues

a) Sunlight to amenity space to be maximised as much as possible and to comply with 3.3.17 of BR209 3rd Edition.

Response

A Daylight and Sunlight Assessment prepared by Digital Dimensions demonstrates that the communal amenity space is well oriented for sunlight and will all achieve 2 hours sunlight on the 21st March over more than 50% of the area. The proposed development meets the recommendations of the relevant BRE Guidelines (2022) for gardens and open spaces. Please refer to the enclosed report for full details.

b) Sufficient buffers shall be provided between the ground floor units and the communal areas and external circulation areas.

Response

The landscaping at ground floor has been designed to provide a visual buffer for the accommodation – please refer to the enclosed Landscaping Report and associated drawings for further details. Internally, a private corridor separates the accommodation from the communal areas.

c) Provide an outline management for the 5th floor outdoor communal terrace.

Response

Following revisions of the proposed development, an additional outdoor communal terrace is also proposed at the 6th floor level. Along with all amenity areas within the proposed development, the management company will be responsible for the management of these

spaces. Planting is provided around the edges of the rooftop communal spaces for security to provide a buffer to the buildings edge. Please refer to the enclosed Landscape Design Statement prepared by BS Landscape Architects for details of the management of the external amenity spaces.

d) Landscape plans may consider planting/landscaping for the front/northern setback area over existing protected frontage.

Response

While it is not possible to provide planting all along the setback area over the existing protected frontage, a corner piece above the main entrance off King Street North is accentuated by the introduction of a planted terrace at level 2. In the midst of a hard landscape dominated environment this offers a glimpse of nature against the backdrop of the proposed building frontage. The terrace itself is inaccessible to students but provides a small pocket which not only adds an aesthetically pleasing feature to street views but is a small haven for birds and flying insects to seek refuge. Please refer to the Landscape Design Statement and associated drawings prepared by BS Landscape Architects for details.

e) Impacts on existing habitats should be considered.

Response

The subject site is entirely made up of buildings and hard surfaces. There are no habitats of ecological value on the site.

Drainage

Insufficient information has been provided on the surface water management proposals. Appendix 13 of the Dublin City Development Plan 2022-2028 sets out the criteria that should be provided. In particular, the following items must be addressed:

a) Clarification of proposed green-blue roof area is required, including full extent of the green roof element. Policy SI23 of the Dublin City Development Plan 2022-2028 and the DCC Green- Blue Roof documents sets out the specific requirements.

Response

Over 80% of the Roof coverage employs Extensive Blue/ Green roof systems.

b) Further details, including calculations, are required for the attenuation and interception storage provisions for each sub-catchment within the site.

Response

Calculations are contained in Appendix A of the Stormwater Management Plan along with a description of the Sub-Catchment areas in section 2 of the report.

c) A clear explanation of the various SuDS devices is required, including any control structures proposed. The SuDS proposals should be integrated fully with the landscaping proposals.

Response

The SuDS proposals have been fully integrated with the landscaping proposals. Refer to CORA drawings along with BS, Landscape Architecture details and drawings for details.

d) A taking-in-charge layout should be provided, which clearly indicates those areas intended to remain private, and those intended to be taken in charge by DCC. The taking in charge proposals will have a direct impact on the drainage proposals.

Response

Please refer to the Taking in Charge drawings prepared by MOLA Architects.

There is a proposal for public realm improvements, including one-way traffic along Brown Street North, footpath provision, dumping area rehabilitation/landscaping on Browne Street North and threshold on the junction with King Street North that shall be taken in charge by DCC. These external works have been subject to a Letter of Consent for inclusion in the planning application received from DCC.

Run-off from the footpath shall be directed the local public storm water gullies on Brown Street North.

e) The applicant is advised to consult with the DPPDC section to ensure the above concerns are adequately addressed.

Response

Consultation has been undertaken with DPPDC and the general stormwater management plan strategy is agreed in principle subject to the further information and detailed calculations, which are outlined in the Stormwater Management Plan and supporting drawings.

Transportation

The applicant is advised that the following points be addressed within the final LRD application documentation:

a) Application Red Line Boundary and works to Brown Street North

i. The applicant is required to prepare a response to SMT010 and the sustainable and efficient movement design criteria under Appendix D of the Sustainable and Compact Settlement Guidelines 2024.

SMT010	Walking and Cycling Audits Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken.
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Response

Full details of the walking and cycling facilities in the environs are provided in the enclosed Mobility Management Plan/Travel Plan prepared by NRB Consulting Transportation Engineers.

Appendix D

Sustainable and Efficient Movement

(i) Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement for sustainable modes of transport (walking, cycling and public transport)?

Response: Similar to the existing layout, the proposed building will occupy the full site, edge blocks with an internal courtyard in the centre. The site is surrounded by North King Street to the north, Bow Street to the east and Brown Street North to the south and west. Public realm improvements including the introduction of an additional footpath on Brown Street North and making the street one-way from the junction of Bow Street to North King Street will improve access and permeability in the area.

(ii) Have opportunities to improve connections with and between established communities been identified and responded to with particular regard to strategic connections between homes, shops, employment opportunities, public transport, local services and amenities?

Response: The subject site is currently in industrial type commercial use and the proposed development provides student residential accommodation and a retail unit, which will serve the local community. The proposed library can serve a public function.

The improvements to public realm enhance the amenities of the area and contribute to connectivity by the introduction of a footpath on Brown Street North where none existed heretofore. A contemporary example of this type of improvement can be seen at Brickfield Lane leading from Cork Street to Brown Street South in Dublin 8, provided in conjunction with PBSA developments.

(iii) Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to calm traffic and enable the safe and comfortable movement of vulnerable users?

Response: The revisions and improvements to Brown Street North have been designed in accordance with DMURS.

(iv) Has the quantum of parking been minimised (in accordance with SPPR4 where relevant) and designed and located in a way that seeks to reduce the demand for private car use, promote sustainable modes of transport and ensure that the public realm is not dominated by parked vehicles?

Response: No car parking has been provided on the site, which is in accordance with the DCDP policies for student accommodation schemes located in a city centre location. 2 no. indented bays are provided along Brown Street North to facilitate deliveries/servicing.

Please refer to the enclosed Servicing/Waste Management Plan and Mobility Management Plan prepared by NRB Consulting Engineers for details.

Mix of Land Uses (Vibrant Centres and Communities)

(i) Is the mix and intensity of land uses appropriate to the site and its location and have land uses been distributed in a complementary manner that optimises access to public transport, amenities and local services via walking or cycling?

Response: The proposed development provides student residential accommodation and a retail unit, which are in accordance with the city centre zoning objective on the site. The site is very well located for access to public transport modes and a range of active transport options.

(ii) Have a diverse and varied range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand Assessment), supplemented by an innovative range of housing typologies that support greater housing affordability and choice?

Response: The proposed development is a purpose designed PBSA scheme, for which there is a proven shortfall and will complement and free-up the permanent housing stock in the inner city.

(iii) Will the plan or development proposal supplement and/or support the regeneration and revitalisation of an existing centre or neighbourhood, including the adaption and re-use of the existing building stock in order to reduce vacancy and dereliction (where applicable) and promote town centre living (where applicable)?

Response: The proposal provides for the redevelopment of an underutilised urban block.

(iv) Is the regeneration and revitalisation of an existing centre or neighbourhood supported

by the enhancement of the public realm so as to create a more liveable environment, attract investment and encourage a greater number of visitors (where applicable)?

Response: The public realm improvements proposed along Brown Street North will greatly enhance the area by providing a footpath on both sides of the street and revitalising the unsightly area located to the south of Brown Street North by providing attractive planting along the revised one-way road.

Green and Blue Infrastructure (Open Space, Landscape and Heritage)

(i) Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas and landmarks and the setting of protected structures, conservation areas and historic landscapes?

Response: The existing site consists of buildings and hard standing areas. The biodiversity value of the site will be improved with the proposed development including green spaces, landscaping and planting.

The proposed development has been carefully designed to integrate with the protected structure façade and significant detail in terms of a Historic Building Survey, Battlefield Assessment and Conservation Method Statement are provided in the planning application documents.

(ii) Have a complementary and interconnected range of open spaces, corridors and planted/landscaped areas been provided, that create and conserve ecological links and promotes active travel and healthier lifestyles?

Response: External amenity spaces are provided at ground, 5th and 6th floor levels for the resident community. An additional green space, which is not accessible to residents of the scheme, is also provided at the 2nd floor level, as a wildlife contribution. The proposed green spaces, landscaping and planting provide a significant improvement in comparison to the existing hardstanding on the site.

(iii) Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of other spaces within the network)?

Response: All amenity spaces are universally accessible.

(iv) Does the plan or development proposal include integrated nature-based solutions for the management of urban drainage to promote biodiversity, urban greening, improved water quality and flood mitigation?

Response: Extensive Blue and green roof systems are used for all levels of the building where possible and a variety of planting finishes is used on the terraces. Please refer to the Stormwater Management Report prepared by CORA Consulting Engineers for further details.

Responsive Built Form

(i) Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure in terms of block layouts and building heights with particular regard to the location of gateways and landmarks, the hierarchy of streets and spaces and access to daylight and sunlight?

Response: The proposed development has been designed to respect and fit into the surrounding context. Further details are provided in the enclosed Architectural Design Statement and Planning Report.

(ii) Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive surveillance and provide an attractive and animated interface?

Response: The protected façade to North King Street and along a section of Bow Street are retained in the proposed development. Active frontages are provided along these areas with a retail unit provided on the main frontage, with passive surveillance from the library and reception areas. The main entrance to the student accommodation scheme is located close to the junction on Brown Street North, which generates activity and the Gym has glazing to the street, promoting passive surveillance where none occurred before.

(iii) Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant), integrate well within its context and provide

appropriate transitions with adjacent buildings and established communities so as to safeguard their amenities to a reasonable extent?

Response: Yes, as indicated in the context evaluation above. Also, full details are included in the Planning Report and Statement of Consistency and Architectural Design Statement.

(iv) Has a coherent architectural and urban design strategy been presented that will ensure the development is sustainable, distinctive, complements the urban structure and promotes a strong sense of identity?

Response: The proposed development has been designed around and to preserve the protected structure element. Full details of the architectural design are included in the Architectural Design Statement.

ii. The applicant shall consider an extension to the red line boundary along its boundary with the surrounding environs to improve the condition of the streets, in particular Brown Street North to ensure the safety and comfort of vulnerable road users. The applicant is requested to liaise with and seek agreement from the Transportation Planning Division prior to submission of the application to agree the layout of the widened footpath. A letter of consent to extend the redline boundary to facilitate the widened public footpath will be required.

Response: The planning application red line boundary was amended on foot of the above request and now includes the entire length of Brown Street North from it's junction with North King Street and Bow Street. Improvements to the road layout and the public realm are proposed as part of this planning application and the proposed details have been agreed in principle with the Transport Planning Division. A letter of consent is included with the application documents.

iii. A Stage 1 Road Safety Audit shall be prepared for the development in relation to Public Road changes arising from the pedestrian and cycling audit referred to above. The recommendations of the audit shall be incorporated into the development and shall inform the improvement works included in the letter of consent request.

Response: A Stage 1 Road Safety Audit was completed and the recommendations of the audit were incorporated into the layout issued to the Transport Division prior to the issuing of the letter of consent. Please refer to the Servicing/Waste Management Plan prepared by NRB Consulting Engineers enclosed, which includes the Road Safety Audit as an appendix.

iv. The proposed footpath along Brown Street North adjacent to the application site shall achieve a minimum width of at least 1.8m, in accordance with the guidance of the Design Manual for Urban Roads and Streets (2019).

Response

The proposed footpath along Brown Street North has a minimum width of 2m, which is in accordance with the requirement above. Please refer to the detailed drawings appended to the Servicing/Waste Management Plan prepared by NRB Consulting Engineers enclosed for details.

v. The application shall include a drawings detailing all areas within the charge and proposed to be taken in charge by DCC at application stage. A review of the ‘taken in charge’ areas should be carried out to ensure the boundary between private and public areas are apparent and follow physical boundaries (building lines/kerb lines etc.) in order to facilitate the management of both areas.

Response

Please refer to the enclosed Taking in Charge drawings prepared by MOLA Architects. The area to be taken in charge is distinguished from the applicant’s ownership by the proposed building line.

vi. The applicant shall submit a revised ground floor plans showing no outward opening doors, cane detection or other private infrastructure onto the public footpath, road or proposed areas to be taken in charge area.

Response

The ground floor has been amended and no outward opening doors are included. Please refer to the Ground Floor Plan prepared by MOLA Architects for details.

b) Site Access and Servicing

i. A comprehensive servicing and delivery strategy shall be provided for the development. The plan should justify the proposed delivery rationale utilization of the ground floor courtyard access along Bow Street and Brown Street North. The plan should not have deliveries rely on any part of the public road. This shall also address servicing requirements for the proposed for all uses on site. Measures to avoid construction of the carriageway and conflicts with vulnerable road users shall be provided.

Response

A Servicing/Waste Management Plan has been prepared by NRB Consulting Engineers and is enclosed. The revised road layout along Brown Street North provides set down areas which are designed for delivery and drop-off only, without impeding traffic flow. Full details are included in the enclosed plan.

ii. An Operational Waste Management Plan shall be submitted. The plan shall indicate the location of temporary waste storage collection areas located off the public footpath.

Response

Details for operational waste management are included in the Servicing/Waste Management Plan prepared by NRB Consulting Engineers enclosed. A dedicated refuse area is provided on Bow Street and collection of waste will be directly outside the refuse store. The PBSA management will be responsible for setting out and removal of bins at collection time.

iii. Auto tracking of refuse vehicle, servicing and delivery and emergency vehicle (ambulance and fire tender) access requirements shall be provided.

Response

Please refer to DWG No. NRB-ATR-001 appended to the Servicing/Waste Management Plan prepared by NRB Consulting Engineers for auto tracking details.

c) Bicycle Parking Proposals

i. A Mobility Management Plan shall be included as part of the planning application. This shall address arrangements for move-in/move-out days, management and allocation of

cycle parking within the development, and conveying of information to students regarding car parking availability in the area.

Response

A Mobility Management Plan has been prepared by NRB Consulting Engineers and is enclosed. It is noted that in 3rd-level education, term time commencements are relatively defined, whereas move-out days are dispersed to reflect exam completion times.

ii. The applicant is requested to prepare a Bicycle Design Statement. The BDS should outline all details on how all bicycles, including the universal design bikes can safely and with ease access the proposed bicycle parking from the public road. The BDS should also outline the following changes to the scheme:

Response

Please refer to the Architectural Design Statement for details of the bicycle parking proposed.

- **The large cycle store at the southern end of the site, which accommodated 288 no. cycle parking spaces, shall be subdivided into at least 2 smaller stores to improve security of cycle parking.**

Response

The large cycle store has been sub-divided into 2 no. smaller units.

- **The quantity of double-stack design cycle parking shall be reduced in favour of an increased number of secure ground level (e.g. Sheffield) stands.**

Response

The quantity of double-stack design cycle parking has been reduced and Sheffield stands are distributed within the courtyard.

- **Provision for adapted bikes (e.g. cargo bikes) and e-charging facilities shall be included within the overall cycle parking provision.**

Response

E-charging and cargo bikes can be accommodated in all bicycle parking areas.

- **Secure cycle parking provision for staff of the proposed development, including the retail unit and internal communal facilities, shall be accommodated.**

Response

The retail unit (117m²) requires 2 bicycle spaces which can be accommodated within the retail area. Bicycle parking for staff of the student accommodation scheme is estimated at 6 spaces, to be accommodated within the secure courtyard area, adjacent to the Bow Street Courtyard Access.

- **Detailed drawings of all cycle parking areas should be included as part of the application. It should be ensured that adequate separation distances between racks and internal access corridors for ease of use and functionality and without conflict with landscaping proposals or walls is achieved.**

Response

The layout of all bicycle parking areas is shown on the proposed ground floor plan and more detailed information on the racking system is provided in Section 6.3 of the Architectural Design Statement. A condition requiring detailed drawings of all cycle parking areas to be provided during detailed design stage is welcomed.

- **All design considerations contained within Section 6.0 of Cycle Design Manual, 2023 published by the National Transport Authority including showing how the universal design bicycle is accommodated.**

Response

The guidance contained in the Cycle Design Manual has been considered and incorporated into the design of the proposed cycle parking areas.

Conclusion

A comprehensive review of the of the proposed scheme has been conducted on foot of pre-application consultations and is reflected in this comprehensive response to the DCC Opinion. It is requested that the application be given due consideration on foot of the information submitted with this application.

Paula Shannon.