

Objection to the proposed draft variation to Dublin City Development Plan

About USI

The Union of Students in Ireland (USI) is the sole representative body for students in Ireland and represents 354,000 students in over thirty member colleges across Ireland, North and South. Throughout its history, USI has worked relentlessly in the pursuit of student rights in all areas of the student experience.

Objectives of the Union of Students in Ireland:

1. An education and training system open to all, irrespective of any consideration, including consideration of national origin, ethnic background, age, ability, sex, sexuality, creed, political beliefs or economic circumstances, so that each individual can realize their full potential.
2. An education and training system which truly serves the interest of the people of Ireland.
3. The right of students to a decent standard of living including the right to adequate financial support, proper housing and future prospects of employment in Ireland.
4. The defence and promotion of all democratic and human rights.
5. The provision of student services for the benefit of the membership on the principle that control of student service should lie with the membership.
6. To represent the interests of the students of Ireland at international level.

Summary

- Generally, we welcome the specific reference to the provision of student accommodation included in the Dublin City Development Plan 2016-2020 and we are glad to be able to contribute to the proposed variation.
- USI has formulated submission independently however we believe it is strongly in-line with the national policy on student accommodation aiming to streamline student accommodation in campuses and in suitable locations within cities.
- Our submission is informed by the research conducted internally for the purpose of this submission, results of the National Student Accommodation Strategy (USI, 2017a) and USI's policy adopted by Congress (USI, 2017b).
- **We would like to object to the proposed variation that would replace the existing text in the Guidelines for Student Accommodation (Section 16.10.7 of Dublin City Development Plan 2016-2020), as it may negatively impact on the mainstream delivery of PBSA underpinned by the national and local policies across Ireland.**

Objection

The publication of the HEA's report on supply and demand of student accommodation (HEA, 2015) facilitated a structured discussion on student accommodation among the policy makers and relevant stakeholders, which led to establishment of Interdepartmental Working Group on Student Accommodation. The Group was responsible for drafting the first National Student Accommodation Strategy that was designed to ensure an increased level of supply of purpose built accommodation (PBSA) (DES, 2017).

Current policy included in the Guidelines for Student Accommodation (Section 16.10.7) (DCC, 2016) reads as follows:

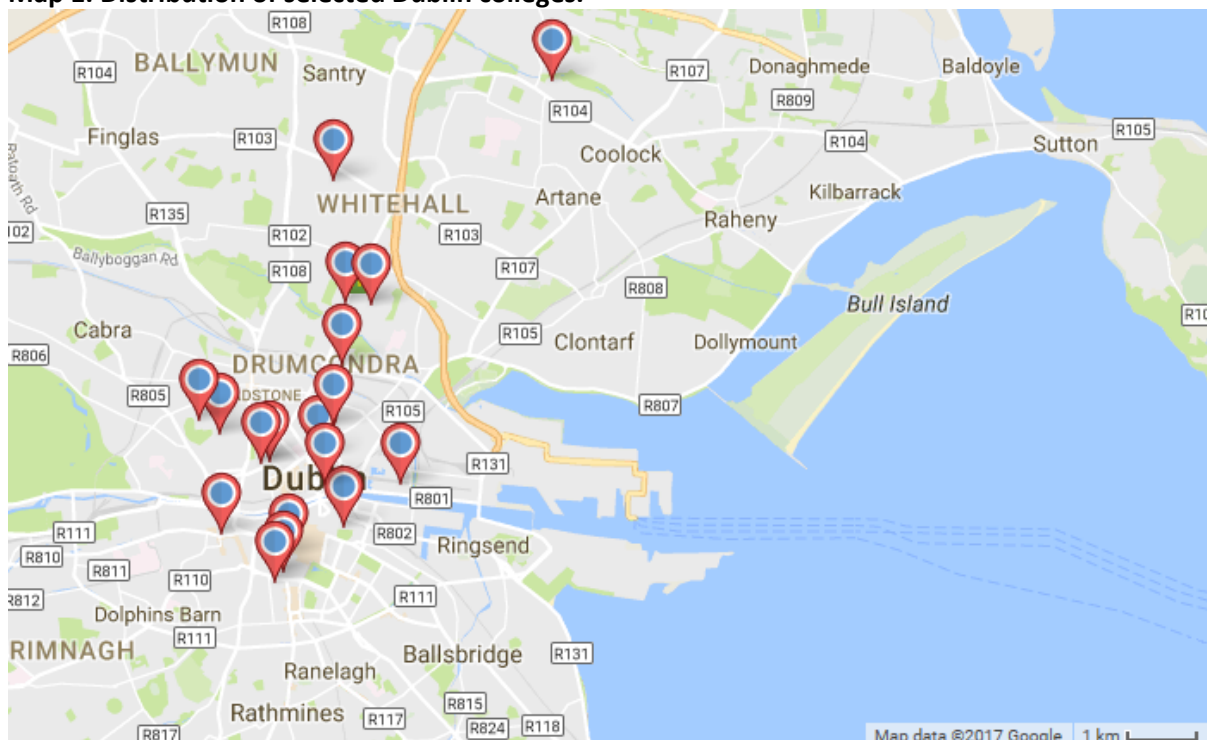
The applicant will be requested to submit evidence to demonstrate that there is not an over-concentration of student accommodation within an area, including a map showing all such facilities within 0.25km of a proposal.

It reflects on the need for the development of student accommodation and addresses the concerns of over-concentration in Dublin. USI sees no need for expanding the study area to proposed 1km, which given the plan of the city and distribution of third-level institution is too broad and creates a threat of limiting potential PBSA development in the city. Additionally, 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.

There are 24 third-level institutions across Dublin (the unions of nine of which are USI's member organisations) educating thousands of students. Existing stock of student accommodation (private and college-owned) in Dublin offers only 12,432 bed spaces (DES, 2017). PBSA projections show that the number of bed spaces may increase by over 15,000 until 2024 (DES, 2016). However, a great majority of those projects are in the planning process or early investigative stage, which means that if further limitations are imposed, those developments may never be progressed. Therefore, we feel that the current area of 0.25 km (i.e. 0.2 km²) for demonstrating concentration of student accommodation should be maintained, as it better reflects the distribution of third-level institutions in the city and student accommodation existing and needed, which will be supported by the arguments presented in this submission.

As shown on the map below (Map 1) distribution of colleges on the map of Dublin is rather dense. Please note that the locations presented on the map represent only six out of nine colleges who are member of Union of Students in Ireland (USI), which constitute one-fourth of all colleges in Dublin region.

Map 1. Distribution of selected Dublin colleges.

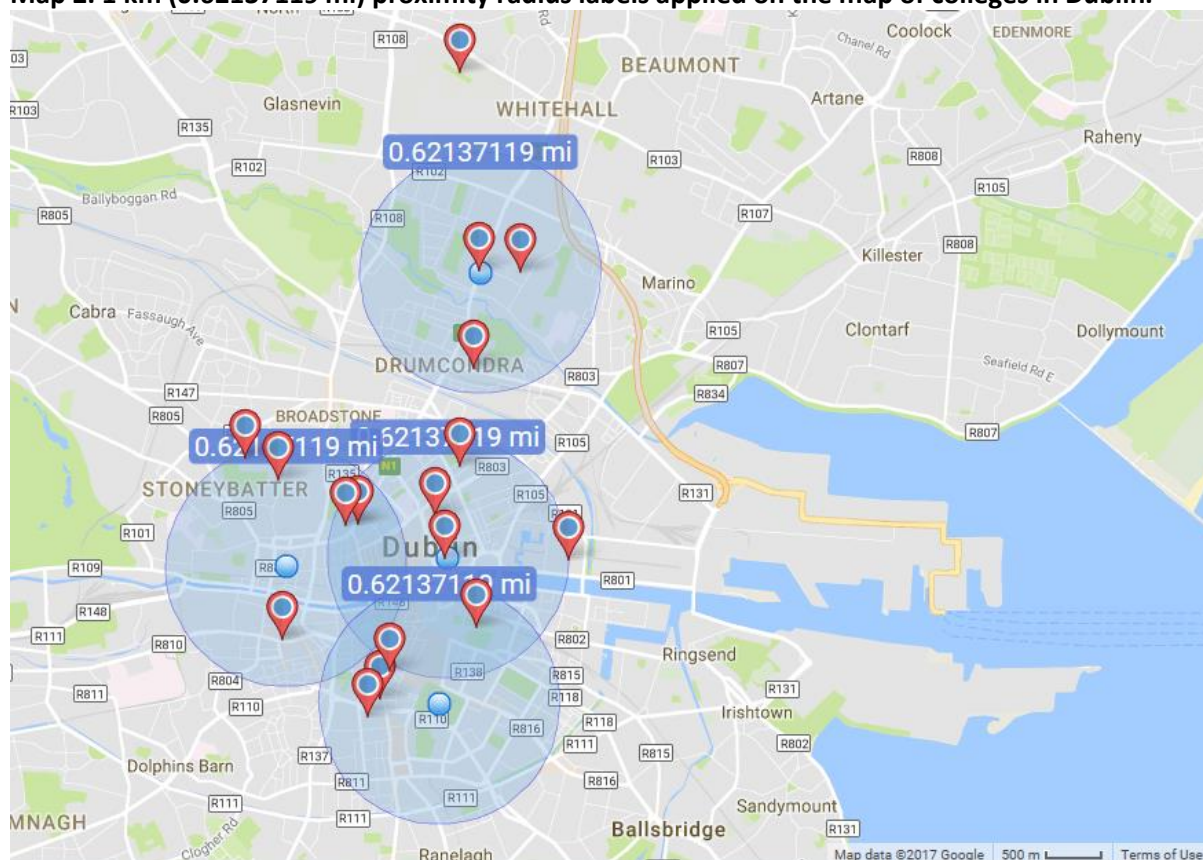


Source: *maptive.com*.

Institutions included on the map are Trinity College Dublin, Dublin Institute of Technology, Dublin City University, National College of Art and Design, National College Ireland and Colaiste Dhulaigh College of Further Education.

The expanded area proposed in the Draft Variation (increased from 0.25km, i.e. 0.2 km² to 1 km, i.e. 3.14 km²) could in practice lead to preventing any additional developments, as the evidence will demonstrate higher concentration of student accommodation and colleges. As shown on the map below (Map 2). Within one 3.14 km² area you can find three to seven third-level institutions with a number of already existing private and college-owned student accommodation. We fear that this might be erroneously interpreted as over-concentration and consequently prevent further developments that are needed. Not every institution can build their own student accommodation, due to land-related or financial constraints, but should be given an opportunity for a cooperation, e.g. on the basis of nomination agreements, to allocate bed spaces to students in proximity to college. USI feels that assessing concentration on the basis of the area that clusters several institutions may result in depriving colleges from building bed spaces base for their students.

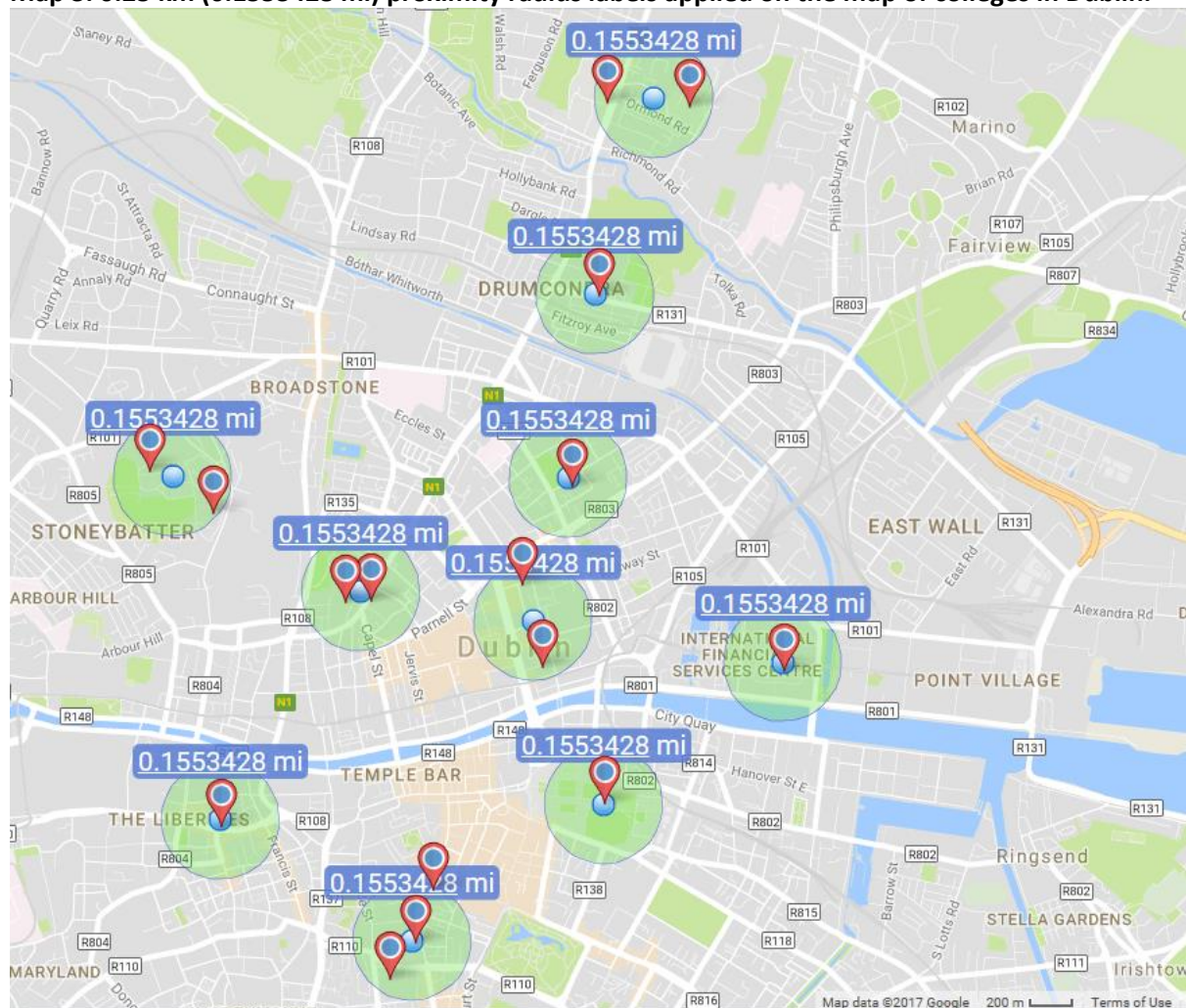
Map 2. 1 km (0.62137119 mi) proximity radius labels applied on the map of colleges in Dublin.



Source: *maptive.com*.

The Proposed Draft Variation's purpose is said to *provide clarity and improved information on the existing and proposed number of student accommodation developments*. Current Guidelines for Student Accommodation oblige the applicant to submit sufficient information that allow for comprehensive assessment of every proposal with regard to pattern and distribution of student accommodation in the proximity of colleges with consideration to sustainable accommodation mix in the locality (see: Map 3).

Map 3. 0.25 km (0.1553428 mi) proximity radius labels applied on the map of colleges in Dublin.



Source: maptive.com.

Additionally, as the Dublin City Development Plan underlines the positive impact of students' presence in urban regeneration, the application for PBSA has to include a plan for integration with the community including community liaison.

Building student housing cannot be regarded as excluding families in a particular area or creating imbalances with the communities and should not be used as a threat to sustainability of neighbourhoods and social cohesion (RPS, 2016). For instance, a few years ago redevelopment and increasing capacity of Trinity Hall in Rathgar met with resistance of the local community that was protesting against over-concentration of students in that area. Today, the Hall that accommodates 1,000 students is well integrated into community and offers student housing in a convenient location. A city the size of Dublin has a far greater ability to integrate students within local communities and therefore should not be compared to smaller cities and university towns in the UK. Consequently, the issue of *studentification* has significantly less likely to become an issue.

However, USI admits that it is important to see and promote the value of accommodation mix in every area across the city. Diverse and well-balanced local communities have a great potential for regeneration, civic activities and engagement. With the integrated national approach to student accommodation reflected in regional policies, we believe that both the Council and An Bord Pleanála

have been equipped with tools to ensure balanced development of the communities and take a strategic approach to spatial distribution and concentration of particular social groups, particularly students, who are particularly vulnerable group facing the housing crisis.

Finally, new planning guidance issued to local authorities and An Bord Pleanála clarifies that Purpose-Built Student Accommodation can be offered to non-student occupiers outside of academic year, which is in-line with the part of Dublin City Development Plan 2016-2020 that underpins a policy context for the promotion of tourism as a key driver for the City's economy (Chapter 6 of Dublin City Development Strategy). Particularly, the city's plans to double the number of visitors by 2020 will need to be reflected in significant increase in facilities such as hotels, apart hotels and tourist hostels ('Destination Dublin' – A Collective Strategy for Growth to 2020). However, this opportunity must not allow for proliferation of change of use permissions sought in respect of planning permissions granted for PBSA.

To conclude, it is not in our interest to purposefully limit the PBSA developments in the city. The measures currently applied are exhaustive for both the Council and An Bord Pleanála to apply strategic approach to PBSA delivery. As demonstrated by the evidence above, increasing the evidence area may negatively impact the assessment of developments that are needed to accommodate students in suitable accommodation.

Given all the above, USI would like to object to the proposed variation that would replace the existing text in the Guidelines for Student Accommodation (Section 16.10.7 of Dublin City Development Plan 2016-2020), as it may negatively impact on the mainstream delivery of PBSA underpinned by the national and local policies across Ireland. Consequently, we would like to urge that the Proposed Variation be declined and the text stands as it is.

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