



# **Planning for growth: Importance of Student Accommodation**

**Submission on the Proposed  
Variation of Dublin City  
Development Plan 2016-2022  
Section 16.10.7**

**July 2017**

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## Introduction

Ibec welcomes the opportunity to respond to the Proposed Variation of Dublin City Development Plan 2016-2022 Section 16.10.7. This follows its submission of July 2016 on the Proposed Amendments to the Draft Dublin City Development Plan (2016-2022). Ibec represents businesses right across Dublin city and county and together with members across the region, they employ over 660,000 people. Dublin city must remain attractive to inward investment, promote enterprise and entrepreneurship, to develop and attract talent, to provide quality housing and ensure the necessary local infrastructure is in place to support economic growth.

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### About Ibec:

Ibec is the group that represents Irish business both domestically and internationally. It has over 180 professional services staff in seven locations and is the umbrella group of over 40 different sectoral industry associations. It has over 7,500 members; home grown, multinational, big and small, spanning every sector of the economy. Together they employ over 70% of the private sector workforce in Ireland.

Ibec and its sectors groups lobby government, policy makers and other key stakeholders nationally and internationally to shape business conditions and drive economic growth. The Ibec team includes experts across all of the major policy areas key to business:

- Economics and taxation
- Education and skills
- Energy and environment
- Transport innovation
- Digital economy
- Labour market
- Diversity
- Public services
- All island investment
- Trade
- EU and international affairs

Ibec is a market leader in forecasts and surveys. Ibec's role as public commentator on the economy has been significant, having correctly identified the turnaround during the economic crisis. More recently, Ibec has accurately forecast economic growth rates and identified the opportunities that these, along with low interest rates, provide for national infrastructure investment.

Ibec provides a wide range of professional direct services to members including employer advice and representation on HR and industrial relations issues. The on-the-ground aspect of this service places Ibec in a unique position of being close to the challenges and concerns of employers. This enables the team to better capture and articulate issues affecting competitiveness and business development to government and policy makers.

## Commentary on the Proposed Variation of the Plan

Cities globally are wrestling with the challenges of development within an established city core, responsive to the various needs of city dwellers. Gentrification, plutocratisation and other initiatives have contributed to what Richard Florida has described as the new 'urban crisis'. A careful balance has to be struck in order not to threaten the cultural, social or economic heritage within a city region. Measures to restrict the numbers of students within the Dublin city fall into this area. This proposal materially contravenes both the proposals under the National Student Accommodation Strategy and the overall objectives of the Dublin City Development Plan 2016-2022.

Dublin City Council must counter the perception that students are merely welcome to study in the city but not to live in it. There is a growing, yet unfounded and short-sighted opposition to purpose-built student accommodation amongst some public representatives on the Council. The Proposed Variation of Dublin City Development Plan 2016-2022 Section 16.10.7 is the latest manifestation of this growing hostility to students residing within a city. Other recent examples include attempts to limit the over-concentration of student housing as part of Grangegorman's redevelopment, the failed planning application on the Mater Dei site and attempts to prevent this accommodation category being included in the Poolbeg West Strategic Development Zone.

In 2009 the National Competitiveness Council published *Our Cities: Drivers of National Competitiveness*. The report highlighted the role that cities play in enhancing competitiveness in modern knowledge-based economies. Irish cities must achieve their full potential in order to boost national competitiveness and cities can drive the regions in which they're located. Given the size, population and overall economic importance of Dublin City to the Irish economy, we need to get the city's future planning framework right.

Dublin's development as a knowledge intensive city has depended on the presence of a highly talented labour market with skills developed in Dublin's higher education institutions or attracted into the city. This ecosystem is interlinked with Dublin's and ultimately Ireland's future economic development. Government is marketing Ireland as a destination for international students and the city must also be able to capitalise on any opportunities from Brexit in growing international student numbers.

## Consistency with the Dublin City Development Plan

The new Dublin City Development Plan (2016-2022) must unlock the economic potential of the city. Ireland will benefit because our economy relies heavily on the performance of our cities and better functioning, sustainable and more vibrant cities will ensure economic growth and continued social advancement. Dublin needs to be more adaptable and capable of responding to the global rise of city regions and accelerated urbanisation.

Student accommodation is consistent with the three interwoven strands for Dublin City Council's core vision for Dublin:

- Compact, quality, green, connected city.
- A prosperous, enterprising, creative city.
- Creating sustainable neighbourhoods and communities.

The plan states that "Dublin is successful in attracting international students and English language students in line with national and City Council Development Plan policies. There is a growing shortage of student accommodation; however, there are investors and providers

willing to develop such facilities. In other cities, clusters of professionally-managed student accommodation are significant forces for regeneration of areas.”

The plan also outlines that all purpose built student accommodation applications must be accompanied by documentation outlining how the scheme will be professionally managed, including confirmation that all occupiers will be students registered with a third-level institution. Documentation must also outline how the scheme will support integration with the local community, through its design and layout. An appropriate management plan should include details in relation to:

- The on-site management team;
- The building and the location;
- The local area;
- The security and monitoring measures in place;
- The ongoing monitoring and management of the building;
- How anti-social behaviour will be dealt with and integration with the community, including community liaison.

These management plans minimise any potential negative impacts from the development and its occupants on surrounding properties and neighbourhoods. They can create a positive and safe living environment for students and develop and enhance the neighbourhoods in which they are situated for the improvement of the surrounding area. Potential problems are identified at a planning stage and negative impacts are subsequently mitigated and minimised through continuous community consultation. This approach is sufficient and successful at identifying potential issues early and subsequently mitigating against negative impacts of a proposed development.

As it stands, permissions for student housing are normally subject to a condition requiring a planning permission for a change of use to other types of residential accommodation. Under Circular PL 8/2016 APH/2/2016, which was issued by DHPCLG on July 28, 2016, the use of student accommodation complexes outside of academic year by non-student occupiers was deemed acceptable. The use of accommodation during these periods provides a potential additional income stream, thereby aiding the overall viability of these projects through their occupation throughout the calendar year. It also provides the necessary footfall required to sustain small, local commercial operations in the surrounding area.

## A student-friendly city

It is unclear what constitutes "an area" - whether it is the presence of existing special type of accommodation or simply the number of students living in dispersed accommodation (e.g. at home) in an area captured by the census. Either way Dublin City Council is at a distinct disadvantage due to the presence of HEIs and demographics. It would communicate a message that the Dublin City area is only for students living at home or those willing to compound the housing shortage by competing for the sparse availability in the private rental sector. If this measure is approved, it would ignore an important aspect of the economic and social life of a city, namely a vibrant student population.

This amendment would push new student accommodation provision to the outer-peripheries of the greater Dublin area, affecting the quality of student life. It would add to pressures on public transport, facing substantial commuting times and the associated expense. Dublin City Council would merely be leaving the issue of new purpose-built student accommodation to neighbouring local authorities, although Dún Laoghaire Rathdown has limited space. Nonetheless, Dublin's HEIs would be hit by their inability to deliver quality student accommodation for both Irish and international students. They'd lose attractiveness as

places to study due to long distances to travel to/from campus to their residences with the alternative being upward pressure on rents in the private rental sector, often for poorer quality product.

A report commissioned by the Grangegorman Development Agency, published in 2016, highlighted that "... the ability of a city the size of Dublin to absorb students is greater than that of smaller cities and university towns in the UK, where studentification has become an issue. It is important to note that the DIT is an existing institution whereby the existing students have been able to be absorbed into the city. It is anticipated that this will continue to be the case."

## Student accommodation helps to ease housing problem

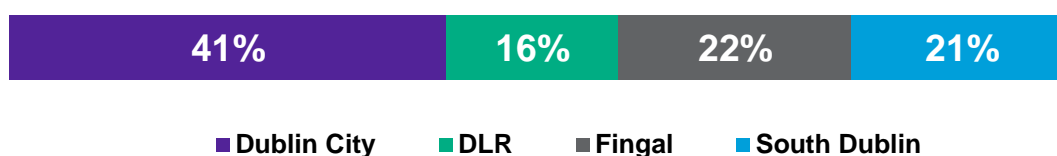
Our growing population raises the big question of where we can call home. Under supply and rising prices are putting severe pressure on young families, job seekers and workers. More affordable and quality housing to buy or rent will underpin national competitiveness. It will make it easier for companies to attract people to Dublin and to keep people working in the city and country.

Dublin City will be expected to play a leading role in solving our immediate housing crisis and deliver a long-term vision for creating a sustainable housing system. An adequate supply of housing would remove the biggest constraint on growth. For example, it would improve the greater Dublin area's potential to grow and create quality jobs. Increased investment in purpose-built student accommodation will ease pressure on other parts of the private rental market, provide affordable and quality accommodation for our student population.

The population figures and projections in the draft Dublin City Development Plan (2016-2022) come from Census 2011. However, looking to Census 2016 policymakers and planner can gain a valuable insight into the movement and preferences of people nationally and at a local level. The state's growth exceeded the CSO's most conservative estimate for 2016 by 1.15%.

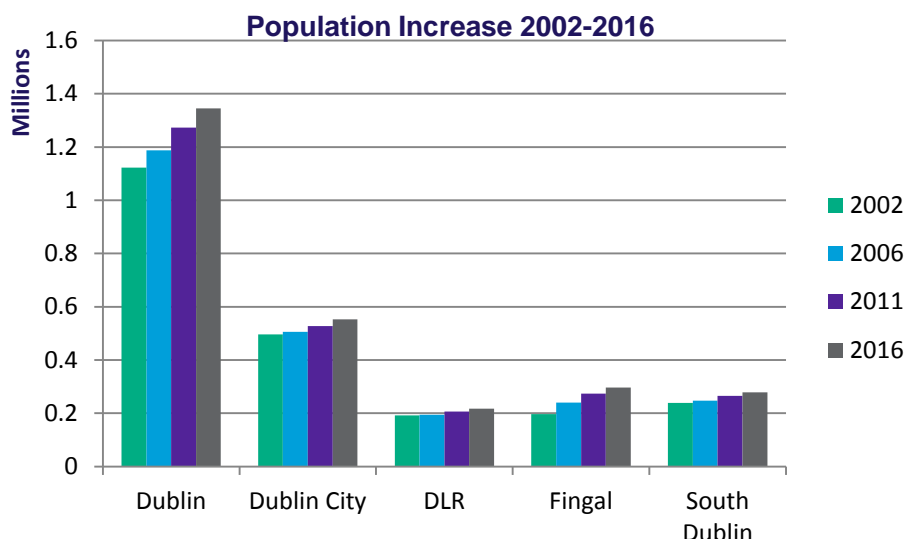
### Dublin's Population 2016

(1,345,402 /28% of State)



The preliminary results show that Dublin's four local authorities were among the fastest growing counties in the country over the past five years. Dublin's combined population increased by 5.7% or 72,333 people. This resulted in these areas now having a combined population of 1,345,402 people. Dublin City now accounts for 12% of the population of the state. Inward migration has contributed 11% to this growth.

The rate of growth in Fingal, Dún Laoghaire-Rathdown, and South Dublin respectively, is moderating. Dublin City has however seen acceleration in the rate at which its population is growing. This is significant in addressing the availability of housing, infrastructure and services. While growth may be stabilising elsewhere in the county it is important to appreciate the significant number of extra people in the county compared to five years ago.



In terms of projected student numbers, the Department of Education and Skills (DES) has previously indicated there is potential nationally for the number of full-time enrolments in DES aided Higher Education Institutions (HEIs) to increase by 27% by 2030. There are a number of additional factors which could potentially impact on the demand for places in the coming years, not least the implications of Brexit. There are approximately 11,000 Irish students currently studying in HEIs in the UK, including 2,300 in Northern Ireland. There may be implications for Irish students studying in the UK in the coming years, depending on the terms negotiated for Brexit.

In addition, the International Education Strategy has set a growth target of 33% for the higher education sector, which will result in an increase in international students in both public and private HEIs from 33,118 in 2014/2015 to approximately 44,000 by the end of the 2019/2020 academic year. It is expected that a significant proportion of these students will attend institutions in Dublin. This projected demand in a period of acute housing shortages in Dublin requires flexibility within the planning process, rather than imposing additional restrictions. Planning, heritage, engineering and architectural deference should be maintained when assessing site suitability and capacity for student accommodation. The proposed restriction could effectively sterilise entire areas that are in need of redevelopment and regeneration, by inadvertently making a proposed development unviable.

It is noted in the National Student Accommodation Strategy, under the Government's housing strategy, Rebuilding Ireland: Action Plan for Housing and Homelessness, the important contribution that increased student accommodation provision can make to resolving the overall housing undersupply problem.

There are a significant number of students renting from private landlords in Ireland, as highlighted by the National Economic and Social Council report *"Ireland's Rental Sector: Pathways to Secure Occupancy and Affordable Supply"* which was published in May 2015. The report also outlined that on average there are 2.73 persons per household in Ireland. While it is likely that the occupancy of a household comprising solely of students is going to be higher than the national average, it is a fair extrapolation to make that every 4 students housed either in purpose built student accommodation or in digs will free up an additional housing unit in the private rented sector that would otherwise have been occupied by students. The impact of an additional 21,000 student accommodation bed spaces nationally, in addition to an additional 1,500 digs spaces would free up at least an additional 5,000 rental units for the wider residential sector.

## The creative city

Higher education institutions and the student population make a significant contribution the vibrancy and diversity of Dublin. Together, they are a foundation of the innovative and creative economy that Dublin requires. Knowledge has become the dominant means of production. Innovative companies both home-grown and multinational require access to highly educated workers. Dublin must remain an attractive city for higher education, attracting a rich blend of students from across the city, across the country and from across the world. This requires quality and affordable accommodation.

Purpose-built accommodation adds to the student experience. Internationally, they have become successful start-up incubators. The potential role they and student enterprise societies play in fostering a spirit of entrepreneurship should not be underestimated. It is precisely to the informal activities associated with academic life that can have a significant impact. Yahoo, Facebook and Google were both student founded, with ideas thought through and problems solved thanks to dorm rooms. Dublin's higher education institutions have the capability to foster enterprise growth through formal (e.g. R&D, teaching & learning etc) and informal (e.g. student societies, student residences etc). It is important not to close off one important avenue for future entrepreneurs.



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