

**REPORT OF CHIEF EXECUTIVE  
Strategic Housing Development**



PURSUANT TO S.5 OF THE PLANNING AND DEVELOPMENT (HOUSING) AND RESIDENTIAL TENANCIES ACT 2016 AND THE PLANNING AND DEVELOPMENT (STRATEGIC HOUSING DEVELOPMENT) REGULATIONS 2017

<b>Prospective Applicant:</b>	Colbeam Limited
<b>Prospective Development Address:</b>	Site at Our Lady's Grove, Goatstown Road, Goatstown, Dublin 4
<b>DLR File Reference:</b>	PAC/SHD/116/20
<b>ABP File Reference:</b>	ABP-307440-20
<b>ABP Description of Prospective Development:</b>	861 no. bedspace student accommodation and associated site works
<b>Notice received from ABP:</b>	13 July 2020

## **1 FORMAT AND BACKGROUND**

### **1.1 Statutory Requirements of this Report pursuant to Section 6(4)(b)**

- (i) Copies of all records of the consultation(s) held with the prospective Applicant by the authority pursuant to s.5(2) and
- (ii) The planning authority's opinion in writing (including the reasons for its opinion) of what considerations, related to proper planning and sustainable development of the area concerned, may have a bearing on the Board's decision in relation to the proposed strategic housing development. having regard to the provisions of the relevant development plan or local area plan as the case may be. And shall send to that prospective Applicant copies of the records and the opinion so submitted.

Note: The Planning Authority's opinion is set out in this report and is without prejudice to third-party submissions or observations, as well as any decision by the Board on this prospective application, following its submission.

### **1.2 Competency**

The Planning Authority notes the Board is the competent authority in relation to-

- (i) Screening the prospective development as a Strategic Housing Development (SHD)
- (ii) Environmental Impact Assessment (EIA) Screening/Scoping, the consideration of any EIA Report prepared by the Applicant and the carrying out of an EIA of any SHD application.
- (iii) The consideration of the reports prepared by the Applicant in support of Stage 1 Appropriate Assessment (AA) - the Screening for Appropriate Assessment Report and where relevant in support of the Stage 2 Appropriate Assessment - the Natura Impact Statement (NIS) and the carrying out of an AA of any SHD application.

(iv) The determination of any SHD application.

### 1.3 Status of Section 247 Consultation and Requirements of S.5(2)

The minutes of the Section 247 consultations undertaken are appended to this report (Appendix A).

### 1.4 Internal Reports

This report has been informed by the appended in-house reports on Housing, Drainage, Transportation; Open Space and Landscaping; and Waste Section (Appendix B).

### 1.5 Proposed Development

*The proposed development will consist of the construction of a Student accommodation development containing 861 No. bedspaces with associated facilities located in 8 No. blocks which range in height from part 3 No. storeys to part 8 No. storeys. Some 844 No. bedspaces are provided in 112 No. clusters ranging in size from 5 No. bedspaces to 8 No. bedspaces. The remaining 17 No. bedspaces are accessible studios.*

*The scheme includes 9 No. car parking spaces; cycle parking; hard and soft landscaping; an ESB substation and all associated works above and below ground.*

*The proposed development also includes the demolition of a disused portion of the 2 No. storey Goatstown Afterschool building which is located in the north eastern corner of the subject site. The main structure of the building will remain in place and will continue to be used by Goatstown Afterschool.*

### 1.6 Development Summary

<b>Parameter</b>	<b>Proposed Development</b>
<b>No. of Student Bedspaces</b>	861 No.
<b>No. of Clusters</b>	112 + 17 accessible studios
<b>Gross Floor Area</b>	25,513 sq m
<b>Site Area</b>	2.12 ha
<b>Site Coverage</b>	19.8%
<b>Plot Ratio</b>	1.20
<b>Density</b>	c. 61 clusters per hectare (112 + 17)/2.12
<b>Other Uses</b>	Retention of 397 sq m of the Goatstown Afterschool
<b>Building Height</b>	3 to 8 storeys generally
<b>Dual Aspect</b>	22.5%
<b>Car Parking</b>	9 No. car parking spaces, which includes: <ul style="list-style-type: none"><li>• 2 No. accessible spaces</li><li>• 1 No. car sharing space</li></ul>
<b>Bicycle parking</b>	1016 No. cycle parking spaces
<b>Motorcycle parking</b>	4 No. parking spaces
<b>Part V Social and Affordable Housing</b>	None proposed

<b>Internal Communal Facilities</b>	1,479 sq m
<b>External Amenity Space for students</b>	3,141 sqm (14.8% of site area)
<b>Public Open Space</b>	6,520 sq m (30.7 % of site area)

### 1.7 Supporting Documentation

In addition to the architectural, landscaping and engineering drawings, the following reports and documentation were submitted:

- SHD Section 5 Pre-Application Consultation Request Application Form and Appendices
- Cover Letter
- Statement of Consistency Report
- Environmental Report
- Material Contravention Statement
- Pre-Application Design Report
- Infrastructure Design Report
- Site Specific Flood Risk Assessment
- Transportation Statement
- Mobility Management Plan
- Construction Management Plan
- Landscape Design Report
- Landscape Visual Impact Assessment
- Arboricultural Report
- Operational Waste Management Plan
- Construction and Demolition Waste Management Plan
- Noise Impact Assessment
- Hydrological and Hydrogeological Qualitative Risk Assessment
- Ecological Technical Note
- NZEB and Part L Planning Compliance Report
- Daylight and Sunlight Analysis
- Verified Views and CGIs
- Student Management Plan

### 1.8 Planning History

There has been a substantial planning history on site and on the wider original 'Our Lady's Grove' landholding including the school sites to the north and north east and the residential area to the east. The relatively recent notable planning applications are as follows with more minor applications having been excluded (prefabs, signage, domestic extensions etc.):

#### On Site

PL06D.304420: Planning permission for Strategic Housing Development Granted for the demolition of the existing GAS building (966 square metres) (in addition to the removal of an associated single storey prefabricated structure (117 square metres)); and the construction of a scheme comprising 132 number residential units. The development will also consist of the construction of a 3,327 square metre basement level comprising car parking (96 number spaces), motorcycle parking (9 number spaces), storage facilities, bin stores, plant, etc., extending under Blocks A and B and public open space; and a one and part-two storey childcare facility (measuring 434 square metres) with terrace at First Floor Level on the western elevation. The development will also consist of the provision of car parking (73 number spaces), motorcycle parking (9 number spaces), and bicycle parking facilities to accommodate 239 number bicycles, including 3 number bicycle/bin storage rooms (collectively measuring 130 square metres) all at surface level; internal routes;

Sustainable Urban Drainage Systems including detention basins, permeable paving, attenuation tanks, and green roofs; renewable energy facilities (PV panels); substation; associated signage; hard and soft landscaping works including provision of public open space, boundary treatments and lighting, and changes in levels; piped services and drainage; and infrastructural works above and below ground. The development will also consist of the temporary use of the Ground and First Floor Levels of Block D (apartment/duplex units) as a childcare facility (300 square metres) with an interim internal/external layout, pending the completion of the proposed childcare facility. The development also includes all other associated site excavation and development works above and below ground.

The Decision to Grant was subject to Judicial Review proceedings (2019 709 JR Redmond V An Bord Pleanála), which resulted in the invalidation / quashing of the decision to grant planning permission.

D10A/0255: Permission Granted for the change, of use to part ground floor of existing convent to after school care facility and Montessori/pre-school centre together with general refurbishment works.

D05A/0093: Permission Granted for a single storey prefab building for after-school care adjacent to the existing Primary School. (The Primary School was originally on the site subject to the current planning application prior to its re-location and it appears that the prefab subject to the application is the 117sqm prefab to be demolished as part of the current application).

#### Adjacent to East (Residential Area)

D16A/212: Permission Granted for amendments to developments permitted under D11A/0595, D15A/0199 and D15A/0324 and primarily to Terraces 4, 5 and 6 reducing the permitted scheme's total number of residential units from 47 no. permitted to 41 no. proposed.

D15A/0199: Permission Granted for amendments to permitted scheme (D11A/0595) to replace permitted Terrace 1 (4 no. apartments plus 4 no. duplex units) with a four storey building comprising 16 no. apartments.

D11A/04595/E: Extension of Duration for permission granted under D11A/0595 — Granted until 03.04.2022.

D11A/0595: Permission Granted for amendments to permitted scheme (D06A/0858) comprising a reduction in the number of residential units from 102 no. units permitted to 40 no. units to comprise 17 no. apartments, 9' no. duplex units and 14 no. houses and change of use from childcare to residential of Roebuck Grove House, omission of basement car parking, alterations to access road and roundabout etc.

D11A/0349 — Permission Refused for amendments to permitted scheme (D06A/0858) comprising a reduction in the number of residential units from 102 no. units permitted to 45 no. units to comprise 21 no. apartments, 10 no. duplex units and 14 no. houses and change of use from childcare to residential of Roebuck Grove House, omission of basement car parking, alterations to access road and roundabout etc. The proposed development was refused because (i) inadequate public open space, (ii) Block 6 is inadequate in floor area, storage and private open space and (iii) inadequate car parking provision.

D06A/0858 - Permission Granted for 109 no. residential units in 4 no. blocks up to five storeys in height and a residential institution building -(convent; 24 no. beds), 176 no. car parking spaces (166 no. in basement), new vehicular and pedestrian accesses from Goatstown Road. The convent building (Errew House) has been constructed.

#### Adjacent to North/North East (Educational Area)

D20A/0192: Permission granted for development consisting of: the removal of a single storey prefabricated building (102 sqm) and a 10m length of wall to the west of the existing tennis courts; and the construction of a single storey pre-fabricated building (162 sqm) for use as a school changing room; the optional construction of a 181 sqm single storey temporary extension to the east of the school changing room and the use of the entire structure (i.e. 343 sqm, including the change of use of the changing room) as a temporary childcare facility for a period of up to 6 months, after which the temporary extension will be removed and the permanent structure (162 sqm) will be used as a school changing room; provision of all hard and soft landscaping works; infrastructural and all other development works above and below ground.

D20A/0198: Permission granted for development at a site of c.1.7 hectares. The development will consist of: the removal of a single storey pre-fabricated building (102 sq.m) and a 10m length of wall to the west of the existing tennis courts; the construction of a 343 sq.m single storey pre-fabricated building for temporary use a childcare facility for a period of up to 6 months, after which the structure will be reduced in area (by 181 sq.m) to 162 sq.m and will be in permanent use as a school changing room; and the provision of all hard and soft landscaping works; infrastructural and all other site development works above and below ground.

D18A/0387 (ABP Ref. PL06D.302898-18): Permission Granted by DLRCC and An Bord Pleanála for a synthetic all-weather pitch on an east-west axis, 3m high boundary fencing, 58m long access road for maintenance/emergency, -changes to levels, hard and soft landscaping works, diversion of services, associated site excavation, infrastructural and all other site development works above and below ground.

D07A/1504: Permission and permission for retention Granted for a two storey 16 no. classroom primary school building with 8 no. support teaching rooms, general purpose room .and,103 no. car parking spaces with new access roundabout and permission for retention of relocation of temporary school car park from that granted under D06A/0858

### **1.9 Site Location and Description**

The subject site is located on the west side of Goatstown Road has a stated area of 2.12 hectares. It is accessed via an internal circulation road off Goatstown Road which also services a childcare facility, a primary school, a secondary school and an existing residential development (The Grove). It is effectively the remaining undeveloped area of the original landholding located in the south west section of the original holding. The subject site is bounded to the west by primarily single storey detached houses along Friarsland Road; to the south by two-storey semi-detached houses with longer gardens along Larchfield Road; The Grove development to the east, which comprises: two and three storey detached and terraced houses; Roebuck Grove House and 2 No. four-storey apartment blocks addressing Goatstown Road; circulation and car parking associated with the secondary school adjacent to the north east and school grounds adjacent to the north, including a new hockey pitch located immediately to the north

The development will be accessed by a roundabout located at the eastern part of the site. The site currently comprises an existing afterschool facility in the north eastern corner of the site. The western and south western area currently comprises an overgrown grassed area while the south eastern area of the site is in use as a construction compound. There are a number of mature trees through the site. The subject site is relatively flat.

In terms of access to public transport a proposed QBC is located along Goatstown Road with Dublin Bus Route 11 (Between Wadelai Park and Sandyford Business District) travels

along Goatstown Road, at a frequency of between 15 and 20 minutes on peak times, with Dublin Bus stops located near the site access. However, the draft Bus Connects proposals do not include an objective to develop a core bus corridor along this route, the closest bus spine is proposed along Stillorgan Road c. 2.4km to the east.

The Dundrum and Windy Arbour LUAS stops are located c. 1.5km to the south west and c. 2.4km to the west, respectively.

The UCD campus is, approximately, c.850m to the north east. Dundrum town centre is c.1.5km to the south west.

### **1.10 Pre-Application Consultation**

A pre-application consultation meeting was held via teleconference on Friday 27<sup>th</sup> May 2020. The minutes of this meeting are appended (Appendix A).

## **2 ASSESSMENT OF PRE-APPLICATION SUBMISSION**

### **2.1 Policy Context**

Plans, policies and guidelines of relevance to the proposed development are outlined in the following sections.

#### ***2.1.1 Project Ireland 2040 – National Planning Framework***

The National Planning Framework includes several National Planning Objectives (NPOs) relating to the provision of sustainable housing. These objectives include:

- NPO3a; Deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements.
- NPO4; Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- NPO33; Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- NPO35; Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

#### ***2.1.2 Rebuilding Ireland – Action Plan for Housing and Homelessness***

The Rebuilding Ireland Action Plan for Housing and Homelessness (2016) identifies five pillars to increase the delivery of housing across all tenures to help individuals and families to meet their housing needs. The plan recognises that a greater level of student accommodation is required to meet projected demand and commits to the development of a national student accommodation strategy.

#### ***2.1.3 National Student Accommodation Strategy***

The National Student Accommodation Strategy (Department of Education and Skills: 2017) identifies actions 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.

The strategy also includes actions to ensure that students are integrated into their local communities including a recommendation that all developers and managers of PBSAs put in place an appropriate Management Plan in order to minimise potential negative impacts on surrounding properties.

#### **2.1.4 Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019**

The Regional Spatial and Economic Strategy for the Eastern and Midlands Region seeks *inter alia* to consolidate the Dublin Metropolitan Area by focussing at least 50% of all new homes within or contiguous to the existing built up area in Dublin.

#### **2.1.5 Section 28 Ministerial Guidelines**

The following ministerial guidelines are also considered relevant:

- Sustainable Residential Development in Urban Areas; Guidelines for Planning Authorities (DEHLG: 2009).
- Design Standards for New Apartments; Guidelines for Planning Authorities (DHPLG: 2018)
- Urban Development and Building Heights; Guidelines for Planning Authorities (DHPLG: 2018).
- Design Manual for Urban Roads and Streets (DTTS and DECLG: 2013).
- The Planning System and Flood Risk Management Guidelines (DEHLG: 2009).

#### **2.1.6 Relevant Circulars**

Circular PL8/2016 APH 2/2016 states that a flexible approach should be applied in respect of planning conditions relating to the use/occupation of student accommodation in order to ensure the financial viability of such projects. In this regard planning authorities are advised not to attach conditions restricting the use of student accommodation complexes for alternative uses during the summer or holiday periods while ensuring that student accommodation is:

- (i) Not used for residential accommodation of a permanent nature,
- (ii) Safeguarded for use by students and other persons related to the Higher Education Institute during the academic year, and
- (iii) Capable of being used for legitimate occupation by other persons/groups during holiday periods, when not required for student accommodation purposes.

#### **2.1.7 Other Relevant Guidelines**

- Guidelines on Residential Developments for Third Level Students (DES: 1999 & 2005).

#### **2.1.8 Dún Laoghaire Rathdown County Development Plan 2016-2022**

The subject site is zoned Objective 'A', to protect and/or improve residential amenity. The surrounding area is also generally zoned Objective 'A'.

#### **Relevant County Development Plan policies and standards:**

##### **Chapter 2**

Section 2.1

*Policy RES3:*

*Policy RES4:*

*Policy RES5*

*Policy RES12:*

##### **Sustainable Communities Strategy**

Residential Development

*Residential Density\**

*Existing Housing Stock and Densification*

*Institutional Lands*

*Provision of Student Accommodation*

Section 2.2

*Policy ST4:*

*Policy ST6:*

*Policy ST12:*

*Policy ST19:*

Sustainable Travel and Transportation

*Accessibility\**

*Footways and Pedestrian Routes\**

*Quality Bus Network\**

*Travel Demand Management\**

<b>Chapter 5</b>	<b>Physical Infrastructure Strategy</b>
Section 5.1	Environmental Infrastructure and Management
<i>Policy EI8:</i>	<i>Sustainable Drainage Systems*</i>
<i>Policy EI9:</i>	<i>Stormwater Impact Assessment*</i>
Section 5.2	Climate Change, Energy Efficiency and Flooding
<i>Policy CC7:</i>	<i>Energy Performance in New Buildings*</i>
<i>Policy CC15:</i>	<i>Flood Risk Management*</i>
<b>Chapter 8</b>	<b>Principles of Development</b>
Section 8.1	Urban Design
<i>Policy UD1:</i>	<i>Urban Design Principles</i>
<i>Policy UD2:</i>	<i>Urban Design Statements</i>
<i>Policy UD3:</i>	<i>Public Realm Design</i>
<i>Policy UD6:</i>	<i>Building Height Strategy</i>
Section 8.2	Development Management
Section 8.2.3	Residential Development
Section 8.2.3.4 (xi)	Institutional Lands
Section 8.2.3.4 (xii)	Student Accommodation
Section 8.2.4	Sustainable Travel and Transport
Section 8.2.4.3	Travel Plans
Section 8.2.4.5	Car Parking Standards
Section 8.2.4.6	Parking and Loading Bays
Section 8.2.4.7	Cycle Parking
Section 8.2.4.8	Motorcycle Parking
Section 8.2.4.9	Vehicular Entrances and Hardstanding Areas
Section 8.2.4.12	Electrically Operated Vehicles
Section 8.2.4.14	Construction Management Plans
Section 8.2.8	Open Space and Recreation
Section 8.2.8.2	Public/Communal Open Space – Quantity
Section 8.2.8.3	Public/Communal Open Space – Quality
Section 8.2.9	Environmental Management
Section 8.2.9.2	Noise Pollution
Section 8.2.9.7	New Developments – Environmental Impacts
Section 8.2.9.11	Drainage and Water Supply
Section 8.2.10.3	Energy Efficiency and Climate Change Adaption
Section 8.3	Land Use Zoning Objectives
Section 8.3.3	Permitted in Principle
Appendix 2	Interim Housing Strategy
Appendix 9	Building Height Strategy
Appendix 16	Green Roofs Guidance Document

Section 8.2.3.4 (xii) of the Development Plan 2016-2022 sets out that all proposals for student accommodation should comply with the following policy documents:

- Department of Education and Science Guidelines on Residential Development for Third Level Students (1999), and the subsequent supplementary document (2005); and,
- 'Student Accommodation Scheme', Office of Revenue Commissioner (2007).

Whilst Map 1 of the DLRCC Development Plan 2016-2022 shows the subject site straddling the north boundary of the Goatstown Local Area Plan. The site is outside the area subject to the Goatstown LAP 2012, as per Map 1 of the LAP.

### 2.1.9 Other Relevant Guidance

- Standards for Cycle Parking and associated Cycling Facilities for New Developments (Dún Laoghaire-Rathdown County Council Municipal Services: 2018).

## **2.2 Planning Assessment**

### **2.2.1 Principle of Development**

As previously noted, the subject site is zoned Objective 'A', to protect and/or improve residential amenity. As per Table 8.3.2 of the County Development Plan, residential development is acceptable in principle on Objective 'A' zoned lands.

Section 8.3.12 of the County Development Plan defines residential uses as "the use of a building or part thereof including houses, flats, bed sitters, residential caravans, etc. designed for human habitation".

Student accommodation falls under the above definition and, as such, is generally acceptable subject to compliance with the relevant policies, standards and guidelines set out in the County Development Plan, and relevant Section 28 Ministerial Guidelines.

The site is also subject to the Specific Local Objective 'INST', which seeks to protect and/or provide for Institutional Use in open lands.

There is also an objective on site to protect and preserve trees and woodlands.

There are certain policy considerations to apply to this proposal on foot of its interaction with the primary and secondary schools within the overall Our Lady's Grove 'campus', which can be summarised as follows.

- Impact on the function of the two existing schools on the campus and their potential expansion.
- Implications of the 'INST' designation on the Our Lady's Grove campus.

Each of these issues will be addressed in turn. At the outset, it is acknowledged that the ownership of the subject site has been separated from the main school campus. However, the planning authority has an obligation to consider the educational needs of the wider area, irrespective of ownership patterns. This falls under the planning authority's wider obligation to consider the objective under this zoning to "protect and/or improve residential amenity". The provision and support of sufficient and viable schools in appropriate locations is an integral part of delivering successful residential neighbourhoods.

Regard is also had to policy RES5 which seeks to ensure that the possible needs for the future provision of additional facilities related to the retained institutional use are taken into account. The Development Plan notes that this particularly applies to schools where a school use remains on the residual part of the site.

Other matters to be considered include:

- Institutional Lands and Open Space provision.
- Appropriateness of location for Student Accommodation
- Demolition of Buildings
- Site Layout
- Building Height
- Density
- Standard of Accommodation
- Design and Finishes
- Open Space and Landscaping and Impact on trees
- Access, Car and Bicycle Parking

- Construction and Operational Waste Management
- Construction Management
- Surface Water Drainage
- Part V/Social Housing
- Impacts on Residential and Visual Amenity
- Miscellaneous
- Appropriate Assessment and Environmental Impact Assessment Screening

### **2.2.2 Impact on the function of the two existing schools on the campus and their potential future expansion**

It is the case that up until recent times, the school uses on site have had access to, or in some instances the potential access to the subject site.

In this context, it is necessary to consider whether the reconfigured schools would be compliant with development plan policy.

Section 8.2.12.4 of the County Development sets out the following as a planning consideration in respect of schools: "*Site location, proximity of school to catchment area, size of site relative to outdoor space requirements and the future needs of the school (i.e. sufficient space provided for future expansion)*" Moreover, Policy SIC8 of the CDP references 'Code of Practice on the Provision of Schools and the Planning System', prepared jointly by the DoEHLG and the Department of Education and Science in 2008. In relation to Site Development Standards, the Code of Practice references Technical Guidance Document TGD-025 from the DoES and recommends that "Planning authorities will generally base their approach in assessing school site requirements on the Department of Education and Sciences site standards referred to-above as well as taking into account other urban design and sustainable development considerations."

Turning to TGD-025, and its companion document for post-primary schools TGD-027 (available at [www.education.ie](http://www.education.ie)), these documents set out recommendations for site area for schools of differing sizes. The primary school on campus is a 16 classroom school.

TGD-025 sets out a site requirement for 8-16 classroom schools and 16-24 classroom schools of 1.04ha and 1.5ha respectively for two storey schools.

TGD-027 sets out comparable requirements for Post Primary Schools but based on number of pupils as opposed to classroom size. The DoES's website gives overview information for the Post Primary school on campus, including a current enrolment of 304 pupils. This comes within the 500-pupil bracket of TGD-027 which recommends a site area of 3.13ha for two-storey schools.

The Applicant has submitted a letter dated 25<sup>th</sup> June 2020 from the Principal of the post-primary school stating any expansion of the school and its facilities will take place within the lands currently under their control.

Whilst the content of the letter is noted, in the Planning Authority's opinion ownership that does not preclude existing and proposed schools from the requirement to comply with the relevant standards, including those related to site areas.

Regard is had to Application Ref. D20A/0192; and D20A/0198 for the construction of temporary facilities within the current boundary of the secondary school. Whilst this refers to changing rooms and ancillary facilities, this can also affect potential additional expansion required to meet educational needs.

In relation to potential shortage of school spaces for children, the Applicant refers to announcements made by the Department of Education and Skills for a new post-primary school with expected capacity for 800 students on the Goatstown-Stillorgan Area. Particular reference is made to Ref. D20A/0268. It is noted that temporary permission is sought for a prefab post-primary school with capacity for 216 students. Thus, it does not appear that capacity for 800 students will be available in the short or mid term in the new school. Furthermore, it is considered that Ref. D20A/0192; and Ref. D20A/0198 outline how despite the new school it is possible that the need may arise to expand existing post-primary school facilities in order to meet potential future demands.

It is considered that, in accordance with the Development Plan 2016-2022, the proposed development should not result in the area allocated to the retained schools to be substandard. The Applicant can be invited to demonstrate in any future Application that the residual area associated with the existing primary and post-primary school on site is in accordance with relevant national and local policy.

### **2.2.3 Institutional Lands and Open Space provision**

The subject site forms part of a larger site, which was previously under the ownership of the Congregation of Religious of Jesus and Mary, subject to the 'Institutional' Specific Local Objective.

According to Policy RES5 of the Development Plan 2016-2022, it is Council's Policy that proposals for the redevelopment of institutional lands (i.e. lands put to *inter alia* educational use) shall retain the open character and/or recreational amenity of the lands. It is established in the Development Plan that in order to retain such open character, a minimum open space provision of 25% of the total site area, or a population-based provision in accordance with section 8.2.8.2 of the Development Plan, whichever is the greater, must be provided.

The Applicant states that the overall campus subject to the Institutional Objective covers c.60,264 sqm. In accordance with the Development Plan, the open space provision shall comprise 25% of the total area (i.e. 15,066 sqm) or a population calculation in accordance with section 8.2.8.2 of the Development Plan, whichever is the greater.

Section 8.2.8.2 of the Development Plan establishes that all residential developments shall provide between 15 sq m and 20 sq m of open space per person. That implies that between 12,915 sq m (861 No. bedspaces X 15) and 17,220 sq m (861 X 20) must be provided, considering the population of the proposed development alone. Similar calculation for the permitted and constructed Grove Development, with 41 No. units will require, approximately 2,000 sq m. It is, therefore, considered that in this instance the population-based open space calculation is greater than the 25% of the site area and therefore that is deemed to be the threshold that should be met.

As part of the proposed scheme the Applicants is proposing to deliver c.6,520 sq m of public open space. The Applicant states that the open space proposal cumulatively with the open space areas of the schools and the existing Grove residential scheme c. 24, 041 sq m of open space will be provided (c. 39% of the overall institutional lands), which is in excess of the population-based calculation. It is noted that

It is noted that a reduction in open space of the school lands will occur as a result of the development permitted under Reg Refs D20a/0192; and D20A/0198, however this is not expected to materially affect the open space provision.

It is considered, however, that the Applicant should be asked to justify the inclusion of sport and recreational areas that form part of the schools, and therefore their use is

restricted for students and not accessible to the public, in the total open space calculation to be delivered in compliance with the Institutional Objective.

The Applicant should also be requested to justify that the over-reliance of the existing open space within the school's grounds to comply with the requirements of the Institutional Objective will not compromise any potential future school expansion. The latter is particularly relevant bearing in mind the letter from the post-primary school's Principal, referenced above, which states that any future expansion will be limited to the school's current site.

The Applicant should also be invited to justify the apparent reduction in size of the main open space area located to the north east compared with the previous scheme.

#### **2.2.4 Site Location and justification of need for Student Accommodation Facility**

Section 8.2.3.4(xii) of the County Development Plan states that student accommodation will be considered within the following hierarchy of priority:

- On campus,
- Within 1km distance from the boundary of a third level institute, and
- Within close proximity to high quality public transport corridors (DART, N11 and Luas), cycle and pedestrian routes and green routes.

The subject site is located outside a third level institution campus, but it is within 850m of an entrance to UCD's Belfield campus on Roebuck Road. Whilst the site is not deemed to be located in close distance to a QBC, the Dundrum LUAS Stop (c. 1.5 km to the south) it is considered to be within reasonable walking and cycle distance). Furthermore, there are dedicated cycle lanes between the site and the UCD campus as well as good pedestrian footpaths.

The Applicant has included an assessment of existing and permitted student accommodation facilities in the area. Including both on campus and off campus facilities, according to the Applicant, there are 5,945 No. purpose-built student bedspaces within 1 km from UCD. The Applicant notes that 32,387 students are currently enrolled at UCD.

Having regard to the foregoing it is considered that the subject site is an acceptable location for purpose-built student accommodation.

The Applicant has submitted a justification for the need of student accommodation bedspaces on the basis of the demand and supply data provided by the Action Plan for Housing and Homelessness – Rebuilding Ireland and the National Student Accommodation (2017), which is acceptable.

#### **2.2.5 Demolition of buildings**

It is proposed to demolish part of the Goatstown Afterschool building located in the north east corner of the proposed site. In particular, it is proposed to demolish the 2 No. storey accommodation block extension. It is not considered that this structure is of any particular architectural or historic value. There are no protected structures on site, this is not an Architectural Conservation Area or an otherwise sensitive location. Therefore, there is no objection to the demolition of the subject structures, subject to ensuring that the demolition works do not impact negatively on the operation of the Afterschool facility.

#### **2.2.6 Density**

Policy RES 5 of the 2016-2022 of the Development Plan establishes a density range for development within institutional lands of 35-50 units per hectare.

Whilst there is not a standard way of measuring density in student accommodation developments, it is noted that in certain instances the number of clusters and the independent accessible studios have been used as proxy of a residential unit (albeit this entails assuming units ranging between 5 to 8 bedrooms, which is not considered as an adequate representation of traditional apartment units) for the purposes of density calculation. Under such approach, the proposed development will deliver a density of c. 61 clusters per hectare  $((112 + 17)/2.12)$ , however this is considered an under representation of the true density to be delivered. Notwithstanding, it is noted that the 61 units per hectare calculation exceeds the density range established for institutional lands.

The subject proposal will deliver c. 6,520 sq m of public open space. With 861 bedspaces proposed, c.7.6 sq m of public open space per person will be provided. This is more than half the open space required by the Development Plan to be provided per person (between 15 sqm and 20 sqm according to section 8.2.8.2 of the DLR Development Plan) on traditional residential developments and appears to suggest that the potential population of student residents could be excessive for the quantum of residential amenities proposed. This can be construed as a symptom that the density proposed is in excess of what the subject scheme can absorb while delivering adequate levels of amenity for residents.

Section 2.1.3.5 of the Development Plan also states that in certain instances higher densities may be permitted where it is demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands. The Applicant links the provision of higher density with higher building forms in order to protect the open space character of the lands. The proposed building height will be further discussed in section 2.2.7 below, however, relying on a proposed building height, which contravenes the Development Plan to justify an increased density with respect to the policy standards is not considered acceptable.

The Planning Authority is not satisfied that the proposed development is fully in accordance with the proper planning and development of the area in relation to density. The applicant should be asked to review the density currently proposed vis a vis the provision of residential amenities.

### **2.2.7 Building Height**

The proposed development generally ranges from three to eight storeys in height with increases in building height occurring to the centre of the site. The three larger blocks (North Block, Middle Block and South Block) located on the north and central parts of the site are part-six, part-seven storeys above ground with the seven storey element located to the centre and set back from the east and west elevations, which are six storeys high.

Those three blocks are located above a partially excavated Lower Ground Floor. Thus, they read as part seven-part eight blocks from certain internal locations such as the north courtyard.

5 No. four storey 'Mews Blocks' are proposed to the south and south east of the subject site.

According to Policy UD6 of the Dun Laoghaire Rathdown County Development Plan 2016 – 2022/Appendix 9 'Building Heights Strategy' of the County Development Plan the subject site is located in a 'Residual Suburban Area not included within Cumulative Areas of Control', where a maximum of 3-4 storeys may be permitted in appropriate locations.

In addition, the Building Heights Strategy states that there will be situations where a minor modification up or down in height by up to two floors could be considered and these factors are known as 'Upward or Downward Modifiers'. The Development Plan requires that it will

be necessary for a development proposal to meet more than one 'Upward Modifier' criteria if there is an increase in height. These include that the site is close to key public transport, within 500m, and the site is large enough (i.e. >0.5Ha) to set its own context.

It is considered that two Upward Modifiers in this instance have been met, i.e. the site is large enough (fully complies); and, it would provide new facilities or enhance existing facilities in such fields as culture, education, leisure or health by providing purpose-built accommodation for third level students.

The upward modifiers would allow for a maximum of two storeys in addition to the 4-storeys permissible.

However, it is considered that one downward modifier related to bulk and scale of the proposed development with regards to the existing pattern of residential development in the area, which is, predominantly one or two storeys high, particularly along the west and south boundaries. This is evidenced, inter alia, in the proposed verified views 7 and 14 submitted, which show an impact categorised as significant and negative, as defined in the accompanying Landscape and visual Impact Assessment. The Planning Authority does not concur with the contention made in the LVIA report that the visual impact will evolve to moderate and negative on the basis that there is no evidence that the pattern of development in that area will be altered in the medium term and it is not anticipated that matured existing and proposed vegetation will provide sufficient screening to reduce the significance of the visual impact, particularly bearing in mind the magnitude of the impact shown in the winter views.

In addition, it is considered that the aforementioned verified views, together with views Nos. 9, 11, and to a lesser extent No. 10 convey the impression of a large overly dominant and monolithic structure, which will detrimentally affect the streetscape.

Therefore, it is considered that the proposed scheme, materially contravenes the Dún Laoghaire-Rathdown Development Plan 2016-2022 in terms of height.

The Applicant notes that the previous residential scheme on site, for which the Board granted planning permission, ultimately quashed following JR proceedings, provided an internal floor-to-ceiling height of c.3.2m resulting in 5 storeys with a total height of c. 16.6 m above ground. The subject scheme, however, reduces the floor-to-ceiling height to c.2.7m. Thus, delivering 6 storeys within the same height as the previous scheme. The additional 7<sup>th</sup> storey proposed in three of the blocks increases the proposed height to a total of c.20.7m. It is, therefore, noted that the proposed scheme is c.4m taller than the previous scheme.

Specific Planning Policy Requirement 3 of the Urban Development and Building Height Guidelines for Planning Authorities, 2018 state that where an applicant sets out how a proposal complies with the development management criteria within the guidelines, and the assessment of the planning authority concurs, taking account of wider strategic and national policy parameters set out in the National Planning Framework and the Urban Development and Building Height Guidelines, the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

The submitted Statement of Consistency and Material Contravention reports state that the height, scale and massing of the proposed development meet the relevant criteria established by the Building Height guidelines

The planning authority does not concur with this statement. Having regard to the submitted elevations, sections, verified views and associated visual impact assessment it is considered that the proposed development fails to comply with some of the criteria

established by the Urban Development and Building Height Guidelines at city, neighbourhood and site scale.

In the Planning Authority's opinion, the applicant should be invited to review the proposed height, massing and volume of the proposed development as it is considered that the current proposal will negatively impact on the visual amenity and the character of the area.

### **2.2.8 Site Layout**

The proposed site layout comprises 3 No. large blocks on an east west orientation (the North Block is c.43.6 m long; the Middle Block is c. 52.6m long; and the South Block is c. 61.6m long).

Additionally, 4 No. Mews Blocks are proposed to the south of the subject site with an additional Mews Block proposed to the east of the South Block. The layout of the Blocks allows the creation of two courtyards, between the North Block and the Middle Block on the north part of the site and between the South Block and the Mews Blocks. The north courtyard is located on lower ground than the south courtyard. These courtyards, linked by a north south street to the west, function primarily as the circulation routes that connect each block with the proposed access to the student accommodation scheme located off the roundabout to the east.

The Central and South Blocks are linked by a single storey above ground Common Room, which houses, at Ground Floor and Lower Ground Floor Levels, the majority of the internal communal facilities proposed.

The Applicant states that the proposed east west orientation of the blocks reduces potential overlooking of existing residential properties in the vicinity of the site. The Planning Authority welcomes this aspect of the proposal and agrees that the block orientation contributes to reduce potential impacts on the privacy of adjoining residents.

Furthermore, the Applicant also states that the proposed orientation also maximises the sunlight and daylight to the interior of the proposed scheme, thus, increasing the residential amenity of the students.

The proposed layout concentrates the proposed buildings towards the centre of the site with a buffer zone created around its edges. This is particularly evident in the verified view No. 2 from the access road at the entrance of the post-primary school. The proposed view shows an unbroken line of built elements starting on the Mews Blocks to the left hand side of the image. The first break coincides with the north courtyard to the centre-right of the image. A further break in the built-up elements can be seen to the right of the image corresponding to the linear park along the north boundary.

It is considered that the applicant should be requested to justify how the proposed arrangement contributes to retain the open character of the lands, in accordance with the Development Plan Policy, given that the open areas appear to be located primarily along the site boundaries.

### **2.2.9 Standard of Accommodation**

The relevant standards for student accommodation are set out in the Guidelines on Residential Developments for 3<sup>rd</sup> Level Students published by the Department of Education and Science (1995) and the subsequent supplementary document published in 2005. The following standards are of relevance.

- Each unit shall consist of a minimum of three bed spaces and a maximum of eight bed spaces and an overall minimum and maximum gross floor area of 55sq.m and 160sq.m respectively.
- Study bedrooms shall be arranged in units sharing a common entrance hall and kitchen/living room.
- Kitchen/dining/living room space shall be based on a minimum of 4sq.m per bed space in the unit.
- Single study bedrooms with ensuite shower, toilet and basin shall have a minimum floor area of 12sq.m
- Single disabled bedrooms with ensuite disabled shower, toilet and basin shall have a minimum floor area of 15sq.m.
- Communal facilities including caretaker/security office and apartment, centralised storage, laundry facilities, drying rooms, utility rooms and a seminar room should be provided at a rate of 12% of the total area of the development.
- Developments should include reasonable provision for secure bicycle storage.
- Developments should provide a minimum of one out of every fifty, or part thereof, of the total number of bed spaces in a development designed for students with disabilities.
- Corridors should not extend more than 50 metres from a widened landing and a maximum of 30 apartment units per lift/core be provided.

### ***Cluster Types and Floor Areas***

The proposed development comprises 116 No. clusters which range from five to eight bedrooms in size with shared common entrances and kitchen/dining/living areas; and 17 No. self-contained accessible studios (in compliance with the 1 accessible unit/50 units ratio). It appears that the majority of clusters comprise 8 No. bedrooms. On the basis of the documentation provided, it appears that the proposed number of bedrooms per cluster comply with the student housing standards (a maximum of 8 bedrooms per cluster).

A detailed Housing Quality Assessment, including a schedule of accommodation should be provided as part of a potential future application demonstrating compliance with the student housing standards.

It is noted that the Accommodation Schedule included in the Pre-Application Design Report submitted notes that the accessible studios are located between the First and the Sixth Floor of the South Block.

However, the Lower Ground and Ground Floor Plans submitted appear to show accessible studios are provided at these levels on the North, Central and South Blocks. The Applicant is advised to ensure consistency across all the documents submitted as part of any potential future application.

### ***Daylight Analysis***

The applicant has undertaken daylight analysis which assesses the level of daylight that would be achieved within a sample of bedrooms, kitchens and living areas.

Whilst the generally positive outcome of the analysis is noted, one of the rooms (MB\_GF\_0201) fails to meet the required BRE target value. The applicant proposes as a compensatory design solution that the shared amenity areas, which meet the BRE thresholds should be considered for the compensation of the bedrooms that do fail to achieve the minimum BRE values. Reference to support this argument is made to the 2018 Apartment Guidelines.

However, the Planning Authority does not consider the proposed compensatory design solution acceptable. On the basis of the site area (2.12) and the surrounding context, which comprises primarily low-rise housing, it is not considered that the proposed development is subject to any constraints that would justify a relaxation of the standards.

Therefore, in the Planning Authority's opinion all bedrooms, kitchens and living areas proposed should meet and exceed the minimum BRE values.

The Daylight and Sunlight Analysis submitted contends that the bedroom MB\_GF\_0201 'is the only room in the entire development that does not meet the BRE Guidelines for ADF'. The Planning Authority considers that insufficient evidence has been provided to support that argument. The provision of further details in that regard is considered appropriate. Whilst the positive results of the rooms selected at Lower Ground Floor Level of the north elevation of the Middle Block are noted, the assessment of all the rooms located at that level of the Middle Block is deemed pertinent as this is an area where achieving minimum ADF values could potentially be compromised for certain rooms. Similarly, ADF should be assessed in all the rooms located at First Floor Level on the north elevation of the South Block.

The Daylight and Sunlight Assessment also shows that the two proposed communal open space areas (the north and south courtyards) fail to achieve the recommended level of sunlight on March 21. However, according to the Applicant, this can be compensated with the public open space areas which benefit from extended hours of sunlight. As noted previously these compensation proposals are not acceptable for the Planning Authority given the area of the subject site and the surrounding built environment.

It is therefore considered that the subject proposal delivers inadequate levels of sunlight for the proposed external communal areas. The Applicant should review the proposed development to provide open communal areas that receive satisfactory levels of sunlight.

### ***Communal Facilities and Amenities***

The proposed development comprises internal communal facilities and amenities at lower ground floor and ground floor levels which include, inter alia:

- Reception desk and seating area;
- Main common room;
- Quiet study space;
- Library;
- Games room;
- Shared kitchen/dining;
- Prayer Room;
- Gym;
- Movie Room;
- Music room;
- Laundry;
- Stores;

The total floor area of the proposed internal communal facilities and amenities (c.1479 sq m) falls c. 1,582.6 sq m short of the student housing standard of 12% of the total gross floor area of the proposed development i.e. 3,061.6sq.m.

The courtyards as currently proposed fulfil the primary function of the circulation of students, either walking or cycling, and staff and equipment associated with the servicing of the Blocks, but do not appear to offer significant opportunities for recreational activities. Thus, in their current form the proposed north and south courtyards are deemed external circulation areas rather than external communal spaces.

Notwithstanding, the Planning Authority could consider compensating the shortage of internal communal space with the provision of usable external communal spaces that offer adequate levels of sunlight.

### **2.2.10 Design and Finishes**

The design of the proposed North, Middle and South Block shares common elements, they are characterised by long north and south elevations with vertical elements 'popping out' and relating to the bay-type windows associated with the common areas within the proposed clusters. These elements seek to provide a vertical emphasis and rhythm to the façade. These elements coupled with a combination of different materials and colours including beige brick, green brick and powder coated aluminium panels attempt to break down the volume of the buildings. It is considered, however, that due to the sheer dimensions of these blocks, with the South Block exceeding 60m in length, the building still conveys the impression of having excessive massing.

It is also noted that the north elevation of the North Block is particularly monotonous and characterless in terms of its forms and is largely dominated by beige brick. It is considered that this confers to the structure a monolithic presence that in return exacerbates the dominant and imposing presence of the building, particularly in the surrounding context of the low-rise and low-density context.

Powder coated aluminium panels are generally used on the set back top floor and, whilst it is acknowledged that they contribute to soften the appearance of the set back-upper level. It is not deemed that the contribution is sufficient to fully ameliorate the dominant appearance of the c.20m high buildings have on the properties in the vicinity

The planning authority would welcome a series of annotated urban design diagrams that demonstrate how the proposed development complies with the 12 criteria set out in the Urban Design Manual Best Practice Guide, as part of a potential future application.

### **2.2.11 Open Space; Landscaping and Tree Removal**

The subject proposal includes the provision of 6,520 sq m of public open space in the form of a nature trail around the perimeter of the subject site and a small park located to the north east of the site. The landscape proposal caters for both active and passive activities with the provision of exercising facilities and s stepped seating are for lingering and relaxing, which is welcomed by the Planning Authority. On the contrary, the nature trail proposed is a linear open space which appears to be more oriented to circulation and with limited opportunities for seating or kick-about. The linear trail is quite narrow at certain points 9c. 6m wide to the south east of the site, for example) that would render it closer to the residual open space category rather than high quality open space.

The provision of high-quality open space is deemed critical in the context of Institutional Lands. The Planning Authority is not satisfied that the current proposal, in particular the nature trail, achieves the required standard.

Furthermore, no provision would appear for playground areas for children. Generally speaking, playground areas that cater for different groups are a very important element of any public open space provision. In this instance it is considered particularly relevant given the surrounding context. The Applicant should consider the provision of play areas for children in order to provide an area of public open space that meets the needs of all age groups.

It is considered that boundary treatments on this site are particularly relevant. A 1.8m high fence is proposed along the boundary with the post-primary school to the north east and to the north. A 1.1m high railing fence is proposed along certain parts of the interface between the hard surface areas of the student accommodation scheme and the proposed nature trail to the north east and the west, along the north south avenue that links both internal courtyards.

Hedging of undetermined height appears to be proposed along both sides of the proposed path that runs along the nature trail. It is not clear, however, on some parts of the site how the difference between public and private areas would be established. It would appear, for example that one could access the south courtyard directly from the south east section of the nature trail.

The proposed development will result in the removal of a large number of trees on site. All the trees located in the east west arrangement across the centre of the site and on a north south orientation to the north and centre of the site are proposed for removal.

Whilst no category A trees are present on site, a number of category B trees are proposed to be removed. Among these, the presence of Oak trees is noted. Reference is made to the explanation of the structural condition provided in the Arboricultural Report submitted whereby at least 3 No. of them (Nos. 60; 61; and 62) are described as 'young and vigorous with immense potential for continued growth over time'. The removal of those trees is, therefore, not justified and it is considered that they should be retained and incorporated within the scheme. As noted previously, the Development Plan 2016-2022 includes the objective to protect and preserve trees and woodlands on site.

It is therefore considered that the proposed development would materially contravene the Development Plan due to the removal of existing valuable trees on site.

The Board and the Applicant are referred to the report from the Parks Section.

#### **2.2.12 Access, Car and Bicycle Parking**

Access to the subject scheme would be off the existing roundabout to the west of the subject site.

The Transportation Planning Section has no objection to the proposed access arrangements but seeks that connectivity and permeability be enhanced with the provision of a pedestrian and cycling link with Friarsland Road to the west.

Parking for 9 No. cars (including 2 No. accessible spaces and 1 No. car sharing spaces) are proposed. The Development Plan does not establish specific standards for student accommodation facilities, however, hostel accommodation is generally used as a proxy for the purposes of car parking provision. On that basis, 57 No. parking spaces should be provided for 861 No. bedspaces. The Applicant justifies the reduction in car parking on the 2018 Apartment Guidelines. It is noted that no issue has been raised from the Transportation Section with regards to the proposed car parking provision.

Parking for 4 no. motorcycles is also proposed. This is considered in accordance with the Development Plan.

In relation to bicycle parking, A total of 1016 No. cycle parking/storage spaces are proposed, as noted by the Transportation Section, this is in excess of the requirements set in the DLRCC Standards for Cycle Parking and associated Cycling Facilities for New Developments document and is welcomed. Notwithstanding, the Transportation Section is seeking an increase in the quantum of Sheffield type parking stands.

The Transportation Planning Section has also requested that the applicant provide the following:

- The Applicant shall submit revised drawings which demonstrate the provision operational electric vehicle charging points at the proposed development. Details of the proposed type of charging unit to be installed to the proposed operational vehicle charging spaces should also be included.

- The Applicant shall submit revised drawings which demonstrate that all proposed car parking spaces should be constructed to be capable of accommodating future electric charging points for electrically operated vehicles (ducting, mini pillars etc.).
- The Applicant shall submit revised drawings and details which demonstrate the provision of a significant portion of "Sheffield" type cycle parking spaces at all proposed cycle parking locations at the proposed development.
- A detailed quality audit carried out to by a suitably qualified and experienced engineering consultant shall be submitted by the applicant. The audit shall include a Road Safety Audit, Access Audit, Cycle Audit and a Walking Audit to demonstrate that appropriate consideration has been given to all relevant aspects of the proposed residential development in accordance with the Design Manual for Urban Roads & Streets (DMURS). The independent Audit Team shall be approved by the Planning Authority (Transportation Planning Section) and all measures recommended by the Auditor shall be undertaken. A feedback report should also be submitted which provides a response to each of the items.
- The Applicant shall submit a letter from GoCar which demonstrates support for the provision of a Go Car car sharing scheme at the proposed development.

The Board and the Applicant are referred to the report from the Transportation Section.

#### **2.2.13 Construction and Operational Waste Management**

It is noted that the applicant has submitted a Construction and Demolition Waste Management Plan and an Operational Waste Management Plan.

Whilst these are generally acceptable, the Waste Section seeks additional issues to be addressed in relation to waste collection, construction waste and complaints handling.

The Board and the Applicant are referred to the report from the Waste Section.

#### **2.2.14 Irish Water**

The Applicant has submitted a letter from Irish Water confirming that the proposed connection to the Irish Water network can be facilitated.

Upgrade works to the existing infrastructure are identified in order to provide the connection to the water network. These required upgrades comprise the replacement of existing mains along Larchfield Road, Mount Carmel Road and Mount Carmel Avenue. Consent from the relevant owners should be included for any works outside the red line.

#### **2.2.15 Surface Water Drainage and Flooding**

As per Policies EI8 and EI9 of the County Development Plan, all development proposals should incorporate Sustainable Drainage Systems and significant development proposals should be accompanied by a Storm Water Audit. Furthermore, Appendix 16 of the County Development Plan requires that roof areas greater than 300sq.m shall provide for a green roof proposal and that a minimum of 60% of the roof area shall comprise a green roof.

The proposed development comprises green roofs, permeable paving and soft landscaping. An attenuation tank system would be installed within the park area to the north east. Discharge from the tank would flow by gravity to connect with public surface water sewer at the roundabout to the east

The report received from the Drainage Planning Section (see Appendix B) raises several issues with respect to the submitted surface water drainage proposals and a couple of issues in relation to the flood risk assessment and has advised that the applicant consult with and reach agreement with the Drainage Planning Section prior to lodging a planning application.

The Board and the Applicant are referred to the report from the Drainage Section.

#### **2.2.16 Part V/Social Housing**

As per the report received from the Housing Section (Appendix B), the provision of off-campus student accommodation is not considered to be exempt from the requirements of Part V of the Planning and Development Act, 2000 (as amended) and whilst it is acknowledged that the on-site provision of social housing would not be an appropriate compliance option in this instance, there are alternative Part V compliance options available to the applicant. In this regard, the Council will seek off-site social housing as the preferred compliance option.

In the event of a future decision to grant permission, the Housing Section has recommended that a condition be attached to same requiring that the applicant/developer enter into an agreement with the Local Authority, prior to the commencement of development, in this regard, unless an exemption certificate has been applied for and granted in accordance with Section 97 of the Act.

The Board and the Applicant are referred to the report from the Housing Section.

#### **2.2.17 Impacts on Residential and Visual Amenity**

##### *Impacts on Residential Amenity*

Whilst the proposed block layout is generally acceptable and distances to the south and west boundaries from proposed buildings generally exceed 11 metres, which is deemed satisfactory, the planning authority has concerns regarding the distance of the North Block to the site boundary to the north (c.7.8m) and the potential negative impact that this may cause on the development potential of the lands to the north. Whilst the provision of blinkered windows to limit overlooking is noted and welcomed, the Planning Authority is not satisfied that the development potential of the adjoining site will not be compromised.

The provisions for the management and servicing of the proposed development, as set out in the submitted Management Plan prepared by the prospective management company, are noted. Specifically, the provision of on-site staff between 8am and 6pm, Monday to Friday, and an out of hours emergency helpdesk service is welcomed.

The contents of the Noise Impact Assessment are noted, in particular with regards to measures proposed to avoid impacts on residential amenity.

##### *Impacts on Visual Amenity*

As previously noted, the proposed development by virtue of its height, scale and volume, as reflected in the drawings and the verified views submitted is likely to have an overly dominant and overbearing appearance, detrimental impact on the visual amenity of the residents on the area, in particular on properties located to the west and north. Furthermore, by virtue of its size and massing it is considered that the North Block will have a monolithic appearance which will detrimentally affect the visual amenity and the character of the area.

#### **2.2.18 Public Lighting**

The Drawing submitted with the proposal for public lighting is noted. The Applicant is advised to coordinate the landscape and public lighting documents to ensure that the required distance between trees and street lamps is achieved.

### **2.2.19 Other Matters**

A decision to grant any future planning application for the proposed development should be subject to conditions requiring:

- Written documentary confirmation for a 'Qualifying Lease' to prove that the accommodation is let to students within the academic year.
- Planning permission for a change of use from student accommodation to another type of accommodation.

It is noted that the applicant does not propose to have any part of the proposed development taken in charge by the local authority.

### **2.2.20 Appropriate Assessment & Environmental Impact Assessment Screening**

The applicant has submitted an Ecological Technical Note and Environmental Report. The latter concludes that an EIAR is not required.

The content of the submitted reports is noted. The planning authority has no further comments in this regard, noting that An Bord Pleanála is the competent authority for the purposes of AA and EIA screening in this instance.

## **3 CONCLUSION**

The planning authority generally welcomed the proposals to develop the subject site, currently vacant. The planning authority also acknowledges the measures taken to address some of the planning authority's initial concerns discussed at the s.247 meeting. Notwithstanding, the planning authority has outstanding concerns with respect to the matters set out below:

1. The proposed development may result in the area allocated to the retained schools to be substandard. The Applicant should be invited to demonstrate in any future Application that the residual area associated with the existing primary and post-primary school on site is in accordance with the relevant national and local policy.
2. Further justification is sought for the inclusion of sport and recreational areas that are not in the applicant's control and are not accessible to the public, in the total open space calculation to be delivered in compliance with the Institutional Objective of the overall campus.
3. The over-reliance of the open space available within the school's grounds to comply with the institutional Objective may compromise any potential future school expansion.
4. The Planning Authority is not satisfied that the proposed development is fully in accordance with the proper planning and development of the area in relation to density. The applicant should be asked to review the density currently proposed vis a vis the provision of residential amenities.
5. It is considered that the proposed scheme, materially contravenes the Dún Laoghaire-Rathdown Development Plan 2016-2022 in terms of height. Furthermore, it is considered that the criteria set out in SPPR3 of the Urban Development and Building Height guidelines 2018 has not been met.

6. It is considered that the applicant should be requested to justify how the proposed arrangement contributes to retain the open character of the lands, in accordance with the Development Plan Policy, given that the open areas appear to be located primarily along the site boundaries.
7. The Planning Authority is not satisfied that the proposed development complies with the BRE Guidelines in terms of sunlight and daylight available for the proposed rooms and external courtyards.
8. The communal amenity space provided is deemed insufficient.
9. The Planning Authority is concerned about the massing and volume of the proposed blocks and the negative impact that may be caused in the visual amenity and the character of the area.
10. The Planning Authority is not satisfied that high quality public open space is being delivered.
11. The Planning Authority considers that the proposed development materially contravenes the objective to protect existing trees due to the proposed removal of high quality specimens.
12. Details of how the proposal will comply with Part V requirements have not been submitted.

In summary it should be noted that the Planning Authority considers that the proposed development would constitute overdevelopment of the subject site, fail to deliver objectives set in the Development Plan for the subject site, detract from the visual amenity of the area and would not provide for a high standard of amenity for future residents and the public.

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Miguel Sarabia  
Assistant Planner

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Shane Sheehy  
Senior Executive Planner

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Ger Ryan  
Senior Planner

## APPENDIX A - S.247 Minutes

Minutes s. 247 meeting Ref. PAC/SHD/116/20 on Friday 29<sup>th</sup> May 2020

SHD proposal for Student Accommodation at Our Lady's Grove, Goatstown Road, Goatstown

Proposed Scheme comprises:

*'The subject scheme is comprised of 915 No. bedspaces of student accommodation arranged in 8 No. blocks which range in height from part 3 No. to part 8 No. storeys. The proposed development also includes the demolition of a disused portion of the Goatstown Afterschool building located in the north eastern corner of the subject site and the removal of an ancillary prefabricated structure.'*

### Attendees

DLRCC	Applicant
Ger Ryan	Sadhbh O'Connor
Shane Sheehy	Stephen Marshall
Elaine Carroll	Conor Doyle
Dara O'Daly	Deirdre Walsh
Miguel Sarabia	Jess Paul
	Dan Egan

The Applicant presented the Scheme with an introduction to the layout and massing and other key elements of the proposal:

- Vegetation to the west and south west considered an asset for the site. Scheme designed to protect trees on the perimeter thus no tree removal is proposed at those locations.
- Scheme comprises a significant reduction in car parking compared to previous SHD Scheme.
- Layout seeks to create a 'natural resort' on the edges.
- 2 No. main courtyards are proposed (north and south)
- The applicant considers Scheme may materially contravene the Development Plan in terms of density, which will be addressed in documentation submitted to the Board on due course.

DLRCC Drainage Department advised that a number of issues had been addressed in the previous proposal (including inter alia SUDs, attenuation storage, discharge rate). However, it seems that new scheme takes a different approach.

Applicant clarified that the proposed surface water management strategy will include SUDs, green roofs, underground attenuation – surface attenuation not possible due to levels -, and permeable. It is noted that the current Scheme has a reduced road surface than previous Scheme. Discharge rate to be applied would be as per previous Scheme. Drainage related issues to be further discussed separately between Applicant and DLRCC Drainage Section.

DLRCC Planning outlined the key considerations from the planning perspective. These include:

The scheme should be considered vis a vis DLRCC's reasons for refusal as stated in the CE Report for the previous SHD Scheme. It is considered that these 3 No. reasons remain relevant:

1. Scheme will impede school's expansion, which is necessary giving that currently operating on sites smaller than recommended under DoES' Technical Guidance documents.

2. Scheme would reduce provided and potential public open space across OLG campus to a level below 25%, contrary to section 8.2.3.4 (xi) of the development Plan. Level of tree removal also contrary to DP.
3. Proposed scheme deficient in terms of open space available for residents.

The Open Space provision should be in accordance with the 'INST' Objective. The Planning Authority is not satisfied that the subject Scheme is compliant having regard to the quantum of open space required (25% of site area – with the overall school campus to be considered - or the population calculation, whichever is the greater) and the requirement to retain the open character of the lands.

Issue of future school expansion deemed a key aspect.

The proposal comprises 8 No. blocks ranging in height from 3 to 8 storeys. The proposal for 8 No. storeys on site is deemed a Material Contravention of the Development Plan. The Applicant agreed on this point.

The PA is concerned about the relationship between the 8 No. storeys proposed and the surrounding single and 2-storeys context.

The Planning Authority is concerned about the distance from the North Block to the north boundary as it is considered that the development potential of the residential-zoned lands to the north could be impacted.

Sunlight/Daylight Assessment should include north facing rooms, particularly at ground at first floor level.

The communal space for students should achieve high standards given the lack of facilities in the area.

The applicant is invited to revisit the massing and the selection of finishes of the top two floors as these are deemed to have a negative visual impact.

Details of the timing of the works to the afterschool childcare facility should be provided to ensure there is no disruption of service.

Details should be provided of existing and permitted student accommodation facilities in the area to determine whether over-concentration occurs.

An email with feedback from the Transportation Section (included in Appendix 1) was shared with the applicant after the meeting.

## Appendix 1

**From:** Casey Claire <[clairecasey@DLRCOCO.IE](mailto:clairecasey@DLRCOCO.IE)>

**Sent:** Tuesday 26 May 2020 13:11

**To:** Sarabia Miguel <[msarabia@DLRCOCO.IE](mailto:msarabia@DLRCOCO.IE)>; O'Dulaing Ruairi <[rodulaing@DLRCOCO.IE](mailto:rodulaing@DLRCOCO.IE)>

**Cc:** Sheehy Shane <[ssheehy@DLRCOCO.IE](mailto:ssheehy@DLRCOCO.IE)>; Kilbride Tom <[tkilbride@DLRCOCO.IE](mailto:tkilbride@DLRCOCO.IE)>

**Subject:** RE: PAC/SHD/116/20

Hi Miguel

Thanks for confirming it is now this Friday 29<sup>th</sup> at 10.30am you would like to have a Stage 1 pre-planning meeting for PAC/SHD/116/20 . I am not sure at this stage if Transportation Planning will have availability to attend or indeed need to attend.

From Transportation Planning perspective inadequate car parking, loading and unloading space provision is likely to be a concern. Transportation Planning do not favour a low level of car parking/car storage at this Goatstown Road suburban location.

Based on provision of 915 bed spaces provision of up to 61 car parking spaces are recommended.

This Goatstown Road suburban location for high density student accommodation is not on campus and relies mainly on walking or cycling to reach the campus and other destinations. Recent SHD preplanning at a nearby site however appears to indicate that ABP are supportive of this type of off campus accommodation which has potential to adversely impact on adjoining residential areas with overspill parking.

There are recent examples (Stillorgan & Sandyford) of off campus permitted student accommodation developments in closer proximity to good public transport links in DLRCO which are not being implemented for student accommodation and are instead being considered for residential apartment units.

Regards

Claire

**End**

## **Appendix B – Internal Department Reports**

Municipal Services,  
Drainage Planning,  
Level 3,  
County Hall.

Re: **PAC/SHD/116/20**

**Site Location:** A 2.13 Ha site at Our Lady's Grove, Goatstown Road, Goatstown, Dublin  
14

### **Drainage Planning report**

#### **Introduction**

As the SHD process does not provide for Further Information the applicant should be strongly advised to consult with and reach agreement with the Drainage Planning Section of Municipal Services on surface water drainage proposals for this site in advance of the lodgment (subject to the consent of An Bord Pleanála following this stage of the process) of a planning application.

- 1.** The applicant has used reduce run-off rates which have not been agreed with Drainage Planning. The proposed run-off rates for permeable paving and contributing grassed areas are particularly low.  
It should be noted that Microdrainage has default Cv values of 0.84 for Winter and 0.75 for Summer. These should be amended to a value of 1.0 where applicants are proposing reduced run-off rates. Maintaining the default Cv values reduces the run-off in simulations of rainfall events, giving inaccurate simulation results which may lead to undersizing of the drainage system and attenuation storage.  
The applicant is required to resubmit their Microdrainage calculations using more appropriate run-off rates, and site specific or local data, such as SAAR, Soil Type, Rainfall Return Period Table (available from MET Eireann), rainfall intensity and other hydrological parameters. The applicant must clearly state and justify all inputs used in Microdrainage and agree these with Drainage Planning prior to submission of the final application.
- 2.** The applicant is connecting to the surface water sewer through an adjacent site. The applicant shall confirm that the proposed surface water system operates independently from the adjacent site's surface water system. If not, then the applicant must demonstrate that both systems will operate adequately together. The applicant shall also provide drainage plans for the system they propose to discharge to up to the point of connection with the public sewer.
- 3.** The applicant has shown pumping of surface water which is unacceptable. The applicant is requested to amend their design to remove the need for surface water pumping. It should be noted that incidental surface run off from enclosed basements/lower ground floor areas should be discharged to the foul sewer and not the surface water sewer.
- 4.** It is acknowledged that the applicant has shown the green roof coverage on the Proposed Site Services drawing, however, they have not maximized green roof coverage on the larger blocks. There are also small sections of green roof provided on the mews buildings which may prove difficult to maintain.  
As standard, the applicant is required to demonstrate by calculation and by representation on a drawing that the proposed green roof extents are in accordance with the Council's Green Roof Policy such that the minimum coverage

requirement of 60% is achieved. The applicant shall also provide details of maintenance access to the green roofs and should note that, in the absence of a stairwell type access to the roof, provision should be made for alternative maintenance and access arrangements such as external mobile access that will be centrally managed. A detailed cross section of the proposed buildup of the green roof should be provided, including dimensions. The applicant should comment on the compatibility of the green roof with PV panels if they are to be incorporated into the design.

- 5.** Although the applicant has provided green roofs, the areas of roof that are not green have not been shown to be intercepted or treated elsewhere. The applicant should note that interception/treatment must be provided for the entire site area as a high level of Interception provided for some parts of the site is not to be considered as adequate compensation for a low degree of interception provision for other locations. Compliance is required for the whole site.  
As standard, the applicant is required to show the options being proposed for interception and treatment volume storage with contributing areas on a drawing together with an accompanying text and tabular submission showing the calculations, to demonstrate compliance with GSDS requirements.
- 6.** If the works are to be phased, the applicant is requested to provide sufficient detail in the Construction Management Plan regarding the measures proposed to construct the surface water drainage system during each phase of works while protecting the previously constructed surface water drainage elements.
- 7.** As standard, the applicant shall submit a detail that shows the flow control device provided does not have a bypass door. The applicant shall also clarify whether a silt trap is being provided in the flow control device chamber and if not to make provision for same.
- 8.** As standard, the applicant is required to submit a complete Site Investigation Report and results, including Infiltration tests, and a plan showing the trial pits/soakaway test locations across the site. The report should address instances where groundwater, if any, was encountered during testing and its impact.
- 9.** If the applicant proposes SuDS measures that incorporate the use of infiltration, the applicant is required to provide details of each SuDS measure and confirm whether it will be lined/tanked or not.  
If lined/tanked systems are to be used, then the applicant will be requested to explain the rationale behind this.  
If unlined systems are to be used then the applicant is requested to demonstrate on a drawing that all infiltration SuDS proposals, including the attenuation system, have a 5m separation distance from building foundations and 3m separation from site boundaries.
- 10.** As standard, the applicant is required to submit supporting standard details, including cross-sections and long-sections, and commentary that demonstrates that all proposed SuDS measures, i.e. permeable paving, porous paving, green roofs/podium, have been designed in accordance with the recommendations of CIRIA C753 (The SuDS manual).
- 11.** As standard, the applicant is required to submit long-sections of the surface water drainage system, clearly labelling cover levels, invert levels, pipe gradients and pipe diameters. Cover should be shown to be to industry standard.
- 12.** As standard, the applicant is required to provide fully dimensioned plans and sections of the attenuation storage system. All relevant inlet and outlet levels,

dimensioned clearances between other utilities, and actual depths of cover to the tank shall be provided. The applicant shall include confirmation from the chosen manufacturer of the storage system that the specific model chosen, with the depth of cover being provided, has the required load bearing capacity to support the loading that may imposed upon it.

- 13.**As standard, the applicant is required to confirm that a utilities clash check has been carried out ensuring all utilities' vertical and horizontal separation distances can be provided throughout the scheme. The applicant should demonstrate this with cross-sections at critical locations such as junctions, site thresholds and connection points to public utilities. Minimum separation distances shall be in accordance with applicable Codes of Practice.
- 14.**As standard, the applicant shall ensure that other disciplines' drawings, including landscape drawings, are compatible with engineering drawings.
- 15.**A Stormwater Audit will be required for this application. In accordance with the Stormwater Audit policy, the audit shall be forwarded to DLRCC **prior to** lodging the planning application. All recommendations shall be complied with, unless agreed in writing otherwise with DLRCC.

## Flood Risk Assessment

1. It is acknowledged that the applicant has commented on the proposed surface water drainage system in the event of blockage or partial blockage of the system. However, the applicant is requested to submit a drawing identifying and showing details of safe overland flow routes both within and without the site. The overland flow route plan should identify drop kerbs or ramps required for channelling the flow, should address low point areas in the site and should detail how properties, both within the development and on adjacent lands, will be protected in the event of excessive overland flows.
2. The applicant is requested to address the existing ditch to the rear of the houses on Larchfield Road along the south border of the site in the SSFRA.

Signed: \_\_\_\_\_  
Elaine Carroll  
**Executive Engineer**  
Drainage Planning  
Municipal Services Department

Date: \_\_\_\_\_

Signed: \_\_\_\_\_  
Bernard Egan  
**Senior Executive Engineer**  
Drainage Planning  
Municipal Services Department

Date: \_\_\_\_\_

**Reg. Reference:** PAC/SHD/116/20  
**Date Lodged:** 29/06/2020  
**Development:** 861 no. bedspace student accommodation and associated site works.  
**Location:** The Grove, Goatstown Road, Dublin 14

### **Report**

The Proposed development includes the provision of 861 No. student bed spaces and is located in the vicinity of UCD.

#### **Car Parking Provision**

A total of 9 No. car parking spaces are proposed at the development, including 2 No. disabled car parking spaces.

Given the location of the proposed development, Transportation Planning have no objection to the limited provision of car parking spaces for the proposed student accommodation development.

In accordance with Section 8.2.3.4 Additional Accommodation in Existing Built-up Areas (xii) Student Accommodation, *"All permissions for student housing shall have a condition attached requiring planning permission for a change of use from student accommodation to other type of accommodation. Future applications for this type of change of use will be resisted except where it is demonstrated that continuing over-provision of student accommodation exists in the County"*

A condition to this effect shall be recommended by Transportation Planning in the event of a grant.

#### **Electric Vehicle Charging Points**

The provision of electric vehicle charging points has not been demonstrated. Although the level of proposed parking provision is minimal, Transportation Planning consider that operational charging points should be provided and that all 9 No. car parking spaces should be capable of accommodating future charging points (e.g. ducting, mini-pillars etc.)

The Applicant will be requested to demonstrate this change in any further submission.

#### **Cycle Parking Provision**

A total of 1016 No. cycle parking/storage spaces are proposed at the development, located at the arch entrance, southern courtyard, north courtyard and basement area.

Transportation Planning note that this level of provision is in excess of the DLRCC Cycle Parking Standards requirements and hence consider this level of provision to be sufficient.

However, only 16 No. cycle parking spaces are the preferred "Sheffield" type stand. Transportation Planning consider that the number/proportion of "Sheffield" type stands should be increased. At a minimum, a portion of cycle parking in all proposed locations should be the preferred "Sheffield" type stand at all cycle parking location.

The ample provision of covered cycle parking is also noted and welcomed.

The Applicant will be requested to demonstrate this change in any further submission.

#### **Permeability & Connectivity**

The Applicant does not demonstrate any permeability links across the site (to Friarsland Road).

Transportation Planning consider that a connection across the site should be facilitated where possible.

The Applicant will be requested to demonstrate the provision of a pedestrian/cyclist connection across the site to Friarsland Road in accordance with Section 2.2.7.1 – ‘Policy ST5: Walking and Cycling’, Section 2.2.7.2 – ‘Policy ST6: Footways and Pedestrian Route’, Section 8.1.1.1 – ‘Policy UD1: Urban Design Principles’ and Section 8.2.3.1 – ‘Quality Residential Design’ of the current County Development Plan (2016 – 2022) and as per Section 3 of the National Transport Authority ‘Permeability Best Practice Guide’ document (2015).

The Applicant will be requested to demonstrate this change in any further submission.

### **Quality Audit**

A Quality Audit has not been submitted as part of the proposed development. Transportation Planning consider that this should be submitted as part of any further submission.

The Applicant will be requested to submit a detailed quality audit prepared by a suitably qualified engineering consultant.

### **Transportation Statement**

The submitted Transportation Statement by DBFL is noted. The statement concludes that the development “*will not materially impact the operational performance of the local road network whilst existing road safety levels should not be adversely impacted.*”

### **Mobility Management Plan**

The submitted mobility management plan is noted. Transportation Planning will recommend, in the event of a grant, a condition that requires all recommended measures outlined within the mobility management plan to be implemented, and the name and contact details of the appointed mobility manager to be submitted prior to first occupation.

A Student Accommodation Management Plan has also been submitted, which outlines measures to manage the move-in/move-out process.

### **Swept Path Analysis**

Swept Path Analysis has been submitted as part of the application.

### **Transportation Planning recommend that the following items be addressed with any further application:**

1. The Applicant shall submit revised drawings which demonstrate the provision operational electric vehicle charging points at the proposed development. Details of the proposed type of charging unit to be installed to the proposed operational vehicle charging spaces should also be included.
2. The Applicant shall submit revised drawings which demonstrate that all proposed car parking spaces should be constructed to be capable of accommodating future electric charging points for electrically operated vehicles (ducting, mini pillars etc.).
3. The Applicant shall submit revised drawings and details which demonstrate the provision of a significant portion of “Sheffield” type cycle parking spaces at all proposed cycle parking locations at the proposed development.
4. The Applicant shall submit revised drawings and details which demonstrate the provision of a pedestrian/cyclist access from the proposed site to Friarsland Road.
5. A detailed quality audit carried out to by a suitably qualified and experienced engineering consultant shall be submitted by the applicant. The audit shall include a Road Safety Audit, Access Audit, Cycle Audit and a Walking Audit to demonstrate that appropriate consideration has been given to all relevant aspects of the proposed residential

development in accordance with the Design Manual for Urban Roads & Streets (DMURS). The independent Audit Team shall be approved by the Planning Authority (Transportation Planning Section) and all measures recommended by the Auditor shall be undertaken. A feedback report should also be submitted which provides a response to each of the items.

6. The Applicant shall submit a letter from GoCar which demonstrates support for the provision of a Go Car car sharing scheme at the proposed development.

**Tom Kilbride Executive Engineer  
Transportation Planning Section**

**30 July 2020**

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**From:** Dara O'Daly, Executive Parks Superintendent  
**To:** Miguel Sarabia, Assistant Planner, Development Management West  
**Date:** 27<sup>th</sup> November 2019  
**Our Ref:** EM12882  
**Re:** **PAC/SHD/116/20 – Our Lady's Grove, Goatstown Road, Goatstown, Co. Dublin**

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**Comments:**

In relation to the above proposed development, this section has reviewed the application and has the following comments;

**1. Trees:**

The best trees within the site are nos. 37-70 situated in the line running east/west and north/south. The trees of particular interest are the *Quercus robur* or Irish Oak contained within the east west line. There are 9no. of these oaks and they are all early mature with the potential to develop into substantial trees over the long term. All of the oak trees are marked for removal within the proposal.

Tree line 2 is a pure stand of Leylands Cypress which is a tree of very low amenity or biodiversity value. Tree line 3 is another stand of pure Leylands Cypress. The screening potential is the only benefit to retaining these mature lines of trees.

Within the red line, the only trees of note to be retained are nos. 87-90. There is wholesale loss of trees across the site otherwise.

**2. Landscape Proposals:**

- The character of the open space provision within the scheme is linear and is orientated towards circulation and movement. The only area that makes any concession as a place to linger or as a destination is the small active sport area in the north east corner containing the basketball and table tennis facilities. The open spaces are very narrow and seem inadequate in relation to the large scale of the building proposal.

**Conclusion:**

The loss of nearly all of the existing trees on the site is hard to justify. Most of the trees being retained have no landscape or nature value.

The quantity of open space within the scheme is lacking. All of the proposed open space is compressed, and shoe horned in around the footprint of the complex.

Policy OSR7: Trees and Woodland

*Tree, groups of trees or woodlands which form a significant feature in the landscape or are important in setting the character of ecology of an area shall be preserved wherever possible".*

8.2.8.6 Trees and Urban Woodlands

*"New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerow..."*

Policy OSR5: Public Open Space Standards:

*"It is Council Policy to promote public open space standards generally in accordance with overarching Government guidance documents "Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities" (2009) and the accompanying "Urban Design Manual – A Best Practice Guide".*

**Recommendation:**

Parks and Landscape Services Section recommend **refusal** of this application for the reasons outlined above.

Signed: \_\_\_\_\_  
Dara O'Daly, Executive Parks Superintendent

Endorsed: \_\_\_\_\_  
**Ruairi O'Dulaing, Senior Parks Superintendent**

## Waste Section Planning Report

Reg. Ref: PAC SHD 116 20 Our Lady's Grove

Date: 21<sup>th</sup> July'20

Engineer: Dermot O'Connor

### General Comments

Environmental Enforcement notes that the proposed development is located in close proximity to existing residential areas and educational and sports facilities.

### Operational Waste Management Plan

Environmental Enforcement is generally happy with the submitted "Operational Waste Management Plan", subject to the following additional points being specifically addressed;

#### A Requirements within Residential Units

1. Provision of sufficient space for the storage of general domestic waste, dry recyclable waste, organic/food waste.
2. Each apartment shall include individual waste storage bins which shall be sized to allow their easy manual handling to be brought to the common waste storage area

#### B Waste Collection system

1. Identification of a suitable location within the curtilage of the development where the waste bins can be left out for collection
2. Access for waste collection trucks, including design of turning circles and headroom requirements.
3. Avoidance of traffic hazard
4. Avoidance of environmental pollution, including visual pollution
5. Avoidance of environmental nuisance and litter
6. Door access to bin area that allows for 1100litre bins plus 20% over width
7. Robust design of doors to bin area incorporating steel sheet covering where appropriate

### Construction & Demolition Management

Environmental Enforcement is generally happy with the submitted "Noise Impact Assesment", "Construction & Demolition Waste Management Plan", " Environmental

Report” and “Construction Management Plan” subject to the following additional points being specifically addressed;

## **A Waste – Construction phase**

Management of waste, including measures to ensure tracking of all waste generated to final destination. In the absence of gate receipts for the licenced facility to which, particularly excavation and demolition waste are brought there is no evidence that materials removed from sites were properly disposed of or that site management is in compliance with statutory obligations under the Waste Management Acts 1996, as amended.

Plans, including applications under Article 27 of the European Communities (Waste Directive) Regulations, 2011 for re-use of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1000 sq.m, a materials source and management plan showing type of materials/proportion of re-use/recycled materials to be used shall be implemented by the developer.

Identification and management of any Hazardous Wastes likely to arise during the construction process. In the event that hazardous waste is encountered during the work, the contractor must notify Dún Laoghaire Rathdown County Council, Environmental Enforcement Section, and provide a Hazardous Waste Management Plan, to include estimated tonnages, description of location, any relevant mitigation, destination for authorised disposal/treatment, in addition to information on the authorised waste collector(s)

## **B Complaints Handling**

Maintenance of a site complaints log detailing

1. Name and address of complainant
2. Time and date complaint was made
3. Date, time and duration of nuisance
4. Characteristics, such as rumble, clatters, intermittent, etc.
5. Likely cause or source of nuisance
6. Weather conditions, such as wind speed and direction
7. Investigative and follow -up actions

Liaison with Local Community and Businesses

Appointment of a Liaison Officer as a single point of contact to engage with the community and respond to concerns

Keeping local residents informed of progress and timing of particular construction activities that may impact on them

**HOUSING DEPARTMENT  
MEMORANDUM**

**To:** Mary Henchy,  
Director of Services  
Planning & Organisational Innovation  
Level 2,  
County Hall

**Date:** 13th July 2020

**Re:** **PAC/SHD/116/20 Our Lady's Grove, Goatstown Road, Dublin 14: Colbeam Limited**

I refer to your request for a housing report in connection with the above proposed development.

The provision of student accommodation is a residential use of land. It is the Council's position that, while student accommodation '*on-campus*' is exempted from the requirements of Part V, development '*off-campus*' is subject to Part V obligations. Therefore, it is the Council's position that as this is a residential development, it is Part V obligated. It is acknowledged, however, that the on-site compliance option would not be suitable. It must also be acknowledged that there are alternative Part V compliance options available and in this regard the Council will seek off-site provision of social housing as the preferred compliance option.

It is therefore recommended that a Part V proposal for compliance with Part V of the Planning and Development Act 2000 (as amended) is requested.

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Aiden Conroy  
Administrative Officer  
Housing Department