



THORNTON O'CONNOR
TOWN PLANNING

Statement of Consistency

Planning Application

In respect of a Student Accommodation Development on a site
at:

Our Lady's Grove
Goatstown
Goatstown Road
Dublin 14

Submitted on Behalf of
Colbeam Limited

February 2021

STATEMENT OF CONSISTENCY - TABLE OF CONTENTS

- 1.0 INTRODUCTION**
 - 1.1 Multi-Disciplinary Team
 - 1.2 Purpose of this Statement
- 2.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT**
- 3.0 SITE LOCATION, CONTEXT AND ACCESSIBILITY**
 - 3.1 Site Location
 - 3.2 Site Context
 - 3.3 Site Accessibility
 - 3.3.1 Public Transport
 - 3.3.2 The Greater Dublin Area Cycle Network
- 4.0 NATIONAL POLICY**
 - 4.1 Project Ireland 2040: The National Development Plan 2018 -2027
 - 4.2 Project Ireland 2040: National Planning Framework
 - 4.2.1 Introduction
 - 4.2.2 Population Growth and Employment
 - 4.2.3 Current Trends in Tenure and Household Formation in Ireland
 - 4.2.4 Sustainable Modes of Transport
 - 4.2.5 Scale, Massing and Design
 - 4.2.6 Waste and Environmental Issues
 - 4.2.7 Implementing the National Planning Framework
 - 4.3 National Spatial Strategy 2002 – 2020
 - 4.4 Action Plan for Housing and Homelessness, Rebuilding Ireland;
 - 4.5 National Student Accommodation Strategy (2017)
 - 4.6 Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018)
 - 4.6.1 SPPR 3
- 5.0 REGIONAL POLICY**
 - 5.1 Regional Planning Guidelines for the Greater Dublin Area 2010-2022
 - 5.2 Regional Spatial and Economic Strategy for the Eastern and Midlands Region
- 6.0 LOCAL POLICY – DÚN LAOGHAIRE RATHDOWN COUNTY DEVELOPMENT PLAN 2016-2022**
 - 6.1 Zoning
 - 6.2 'INST' Objective
 - 6.3 Density
 - 6.4 Building Height
 - 6.5 Car Parking
 - 6.6 Bicycle Parking
 - 6.7 Objective to Protect and Preserve Trees
 - 6.8 Other Relevant Development Plan Policy
- 7.0 CONCLUSION**

1.0 INTRODUCTION

Thornton O'Connor Town Planning in association with a multidisciplinary team as detailed in the table below, have been retained by Colbeam Limited to prepare a Planning Application in respect of a proposed development principally comprising the provision of a 698 No. Student Accommodation development on a site at Our Lady's Grove, Goatstown, Goatstown Road, Dublin 14. The scheme also includes some works to an existing Afterschool facility at the lands.

1.1 Multi-Disciplinary Team

COMPANY NAME	DOCUMENTS PREPARED
<p>Thornton O'Connor Town Planning</p> <p>No. 1 Kilmacud Road Upper Dundrum Dublin 14.</p>	<ul style="list-style-type: none"> • Planning Report • Statement of Consistency • Environmental Report • Material Contravention Statement • Response to An Bord Pleanála Opinion
<p>Stephen Marshall Urbanism Limited</p> <p>North Building Gainsborough Studios No. 1 Poole Street London N1 5EB United Kingdom</p>	<ul style="list-style-type: none"> • Schedule of Accommodation • Architectural Drawings • Design and Accessibility Statement
<p>DBFL Consulting Engineers Limited</p> <p>Ormand House Ormand Quay Upper Dublin 7 D07 W704</p>	<ul style="list-style-type: none"> • Infrastructure Design Report (including a Stormwater Audit prepared by JBA Consulting attached as an Appendix) • Drainage Drawings • Site Specific Flood Risk Assessment Report • Transport Statement (including a Road Safety Audit prepared by Bruton Consulting Engineers attached as an Appendix) • Mobility Management Plan • Construction Management Plan
<p>The Big Space Landscape Architecture</p> <p>Creative Dock Malahide Marina Village Malahide Co. Dublin K36 W540</p>	<ul style="list-style-type: none"> • Landscape Design Report • Landscape Drawings • Landscape Visual Impact Assessment

<p>AWN Consulting Limited</p> <p>The Tecpro Building 17 Clonshaugh Business & Technology Park Dublin 17</p>	<ul style="list-style-type: none"> • Operational Waste Management Plan • Construction Demolition Waste Management Plan • Noise Impact Assessment • Hydrological and Hydrogeological Qualitative Risk Assessment
<p>The Tree File Limited</p> <p>Brookefield House Brookefield Terrace Blackrock Co. Dublin A94 H7Y4</p>	<ul style="list-style-type: none"> • Arboricultural Assessment and drawings
<p>3D Design Bureau</p> <p>No. 65 Rock Road Blackrock Co. Dublin A94 PT62</p>	<ul style="list-style-type: none"> • Daylight and Sunlight Analysis Report • Verified View Montages and CGIs
<p>Scott Cawley Limited</p> <p>College House Nos. 71-73 Rock Road Blackrock A94 F9X9</p>	<ul style="list-style-type: none"> • Appropriate Assessment Screening Report • Ecological Impact Statement
<p>Axiseng</p> <p>No. 57 Mount Street Upper Dublin 2 Do2 AC65</p>	<ul style="list-style-type: none"> • Public Lighting Report and Layout • NZEB and Part L Compliance Report
<p>O’Herlihy Access Consultancy</p> <p>Guinness Enterprise Centre Taylor’s Lane Dublin 8 Do8 X8DP</p>	<ul style="list-style-type: none"> • Accessibility Report
<p>Colbeam Limited</p> <p>c/o Cooney Carey Consulting Limited The Courtyard Carmanhall Road Sandyford Dublin 18 D18 YD27</p>	<ul style="list-style-type: none"> • Student Management Plan

1.2 Purpose of this Statement

The *Planning & Development (Strategic Housing Development) Regulations 2017*, specify that all SHD applications must be accompanied by a statement demonstrating that the proposal is consistent with the relevant National, Regional and Local Policies.

The following policy documents are discussed within this document:

National

- *Project Ireland 2040 – National Development Plan 2018-2027;*
- *Project Ireland 2040 – The National Planning Framework;*
- *National Spatial Strategy 2002-2020;*
- *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
- *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
- *Guidelines for Residential Developments for 3rd Level Students (1999);*
- *National Student Accommodation Strategy (2017); and*
- *The Planning System and Flood Risk Management (2009)*

Regional

- *Regional Planning Guidelines for the Greater Dublin Area 2010-2022;*
- *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly; and*
- *Metropolitan Area Spatial Plan for Dublin City and Suburbs.*

Local

- *Dún Laoghaire Rathdown County Council Development Plan 2016-2022*

The purpose of this Statement of Consistency document is to demonstrate that the proposed development comprising 698 No. Student Accommodation bedspaces and ancillary facilities and associated development is consistent with the relevant policy documents.

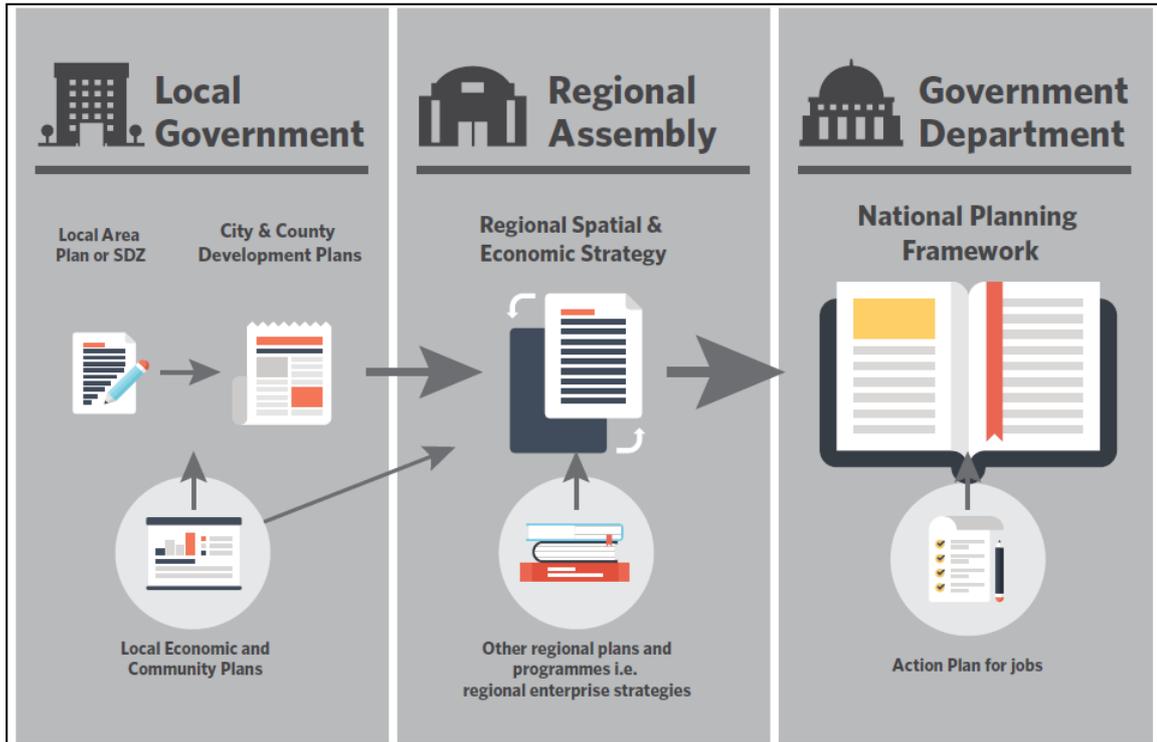


Figure 1.1: National Planning Hierarchy

Source: Regional, Spatial and Economic Strategy for the Eastern and Midland Regional Assembly

2.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The subject planning application is categorised as a Strategic Housing Development as defined in Section 3 of the *Planning and Development (Housing) and Residential Tenancies Act 2016* (amended July 2018), which states that Strategic Housing Development means:

- a) *the development of 100 or more houses on land zoned for residential use for a mixture of residential and other uses,*
- b) ***the development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon.***
- c) *development that includes developments of the type referred to in paragraph a) and of the type referred to in paragraph b), or*
- d) *the alteration of an existing planning permission granted under section 34 (other than under subsection (3A)) where the proposed alteration relates to development specified in paragraph a), b) or c).'* [Our Emphasis]

The development will principally consist of: the construction of a Student Accommodation development containing 698 No. bedspaces with associated facilities located in 8 No blocks, which range in height from part 3 No. storeys to part 6 No. storeys over part lower ground floor level (7 No. storeys as viewed from an internal courtyard). Some 679 No. bedspaces are provided in 99 No. clusters ranging in size from 5 No. bedspaces to 8 No. bedspaces, each with a communal Living/Kitchen/Dining room. The remaining 19 No. bedspaces are accessible studios. The development includes the provision of communal residential amenity space at lower ground floor level (349 sq m) including the provision of a movie room (108 sq m), a music room (42 sq m) and a laundry (37 sq m); communal residential amenity space (1,356 sq m) at ground floor level including the provision of a gym (228 sq m), reception desk and seating area (173 sq m), a common room (338 sq m), a study space (104 sq m), a library (64 sq m), a yoga studio (74 sq m), a prayer room (33 sq m) and group dining (33 sq m).

The development also includes staff and administrative facilities (195 sq m); 9 No. car parking spaces; 4 No. motorcycle parking spaces; 860 No. cycle parking spaces; refuse stores; signage; an ESB substation and switchroom; boundary treatments; green roofs; PV panels; hard and soft landscaping; plant; lighting; and all other associated site works above and below ground. The development includes the demolition of part of the Goatstown Afterschool building (558 sq m) and the construction of a new external wall to the remaining ope. In addition, a prefabricated structure (161 sq m) located to the south of the Afterschool building is proposed to be removed.

The subject site is eminently suitable for Student Accommodation given the proximity to University College Dublin, which is located approximately 850m to the north west and is readily accessible by foot or bicycle.

North Block (119 No. Bedspaces)

The North Block is a part 5 to part 6 No. storey over lower ground level block located in the north western corner of the subject site, adjacent to the hockey pitch associated with Our Lady's Grove School. The North Block contains 119 No. bedspaces provided in clusters as follows:

- 9 No. bedspaces divided into two clusters, each with a communal living/kitchen/dining area at lower ground floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at ground floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at first floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at second floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at third floor level.
- 20 No. bedspaces divided into three clusters each with a communal living/kitchen/dining area at fourth floor level.
- 10 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at fifth floor level.

Middle Block (168 No. Bedspaces)

The Middle Block is a part 5 No. storey to part 6 No. storey over lower ground level block located in the centre of the subject site comprised of 167 No. bedspaces provided in clusters and 1 No. accessible studio and ancillary facilities as follows:

- At lower ground floor level: a bicycle store; a music room; a movie room; a laundry; and 11 No. bedspaces divided into two clusters each containing a communal living/kitchen/dining area.
- A reception desk and seating area and a main common room at ground floor level and 18 No. bedspaces divided into three clusters each containing a communal living/kitchen/dining area.
- 30 No. bedspaces divided into four clusters, each containing a communal living /kitchen/dining area at first floor level.
- 30 No. bedspaces divided into four clusters, each containing a communal living /kitchen/dining area at second floor level.
- 30 No. bedspaces divided into four clusters, each containing a communal living /kitchen/dining area at third floor level.

- 30 No. bedspaces divided into four clusters, each containing a communal living /kitchen/dining area at fourth floor level.
- 18 No. bedspaces divided into three clusters, each containing a communal living /kitchen/dining area and 1 No. accessible studio at fifth floor level.

South Block (159 No. Bedspaces)

The South Block is a part 5 No. to part 6 No. storey over lower ground block comprised of 18 No. accessible studios and 141 No. bedspaces provided in clusters and ancillary facilities as follows:

- A plant room; staff changing rooms and toilet facilities; store rooms and an electrical room at lower ground floor level.
- A study space; a gym; a meeting room; a prayer room; a yoga studio; an administration and managers office; and a communal dining room at ground floor level.
- 4 No accessible studios and 30 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at first floor level.
- 4 No accessible studios and 30 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at second floor level.
- 4 No accessible studios and 30 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at third floor level.
- 4 No accessible studios and 30 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at fourth floor level.
- 2 No accessible studios and 21 No. bedspaces divided into four clusters each with a communal living/kitchen/dining area at fifth floor level.

Mews Block A (56 No. Bedspaces)

Mews Block A is a 4 No. storey block located adjacent to the western boundary of the subject site and is comprised of 56 No. bedspaces provided in clusters and ancillary facilities as follows:

- 14 No. bedspaces divided into two clusters with each with a communal living/kitchen/dining area at ground floor level.
- 14 No. bedspaces divided into two clusters with each with a communal living/kitchen/dining area at first floor level.
- 14 No. bedspaces divided into two clusters with each with a communal living/kitchen/dining area at second floor level.
- 14 No. bedspaces divided into two clusters with each with a communal living/kitchen/dining area at third floor level.

Mews Block B (42 No. Bedspaces)

Mews Block B is a part 3 No. to part 4 No. storey block located in the south western corner of the subject site and is comprised of 42 No. bedspaces provided in clusters and ancillary facilities as follows:

- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at ground floor level.
- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at first floor level.
- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at second floor level.
- 6 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at third floor level.

Mews Blocks C and D (56 No. Bedspaces x 2 = 112 No. Bedspaces)

Mews Blocks C and D, are part 3 No. to part 4 No. storey blocks located along the southern boundary of the subject site, with each containing 56 No. bedspaces provided in clusters and ancillary facilities as follows:

- 16 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at ground floor level.
- 16 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at first floor level.
- 16 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at second floor level.
- 8 No. bedspaces in a single cluster and a communal living/kitchen/dining area at third floor level.

Mews Block E (42 No. Bedspaces)

Mews Block E, which is located in the south easter corner of the subject site, is a part 3 to part 4 No. storey block containing 42 No. bedspaces provided in clusters and ancillary facilities as follows:

- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at ground floor level.
- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at first floor level.
- 12 No. bedspaces divided into two clusters each with a communal living/kitchen/dining area at second floor level.

- 6 No. bedspaces in a single cluster with a communal living/kitchen/dining area at third floor level.

Demolition

The proposed development also includes the demolition of part of the Goatstown Afterschool building, namely a portion of the building which has fallen into disrepair (558 sq m).

The existing Goatstown Afterschool buildings consist of a single storey classroom block with a 2 No. storey accommodation block extension. It is proposed to demolish the 2 No. storey accommodation block extension which is no longer in use and has fallen into a serious state of disrepair. The demolition of this disused portion of the Goatstown Afterschool building is in the interests of the health and safety of staff and students of the facility. Following the demolition of the disused portion of the building, the Applicant will make good the façade through the construction of a new external wall to enclose the remaining ope.

In addition, a prefabricated structure (161 sq m) located to the south of the Afterschool building is proposed to be removed.

Ancillary Works

The proposed development also includes ancillary works including but not limited to signage; 9 No car parking spaces; 4 No. motorcycle parking spaces; 860 No. cycle parking spaces; hard and soft landscaping; photovoltaic panels; plant; and all associated works above and below ground.

3.0 SITE LOCATION, CONTEXT AND ACCESSIBILITY

3.1 Site Location

The subject site, which measures c. 2.12 Ha (21,218 sq m) is located along the western side of the R-825 Goatstown Road and approximately 5km south of Dublin city centre.

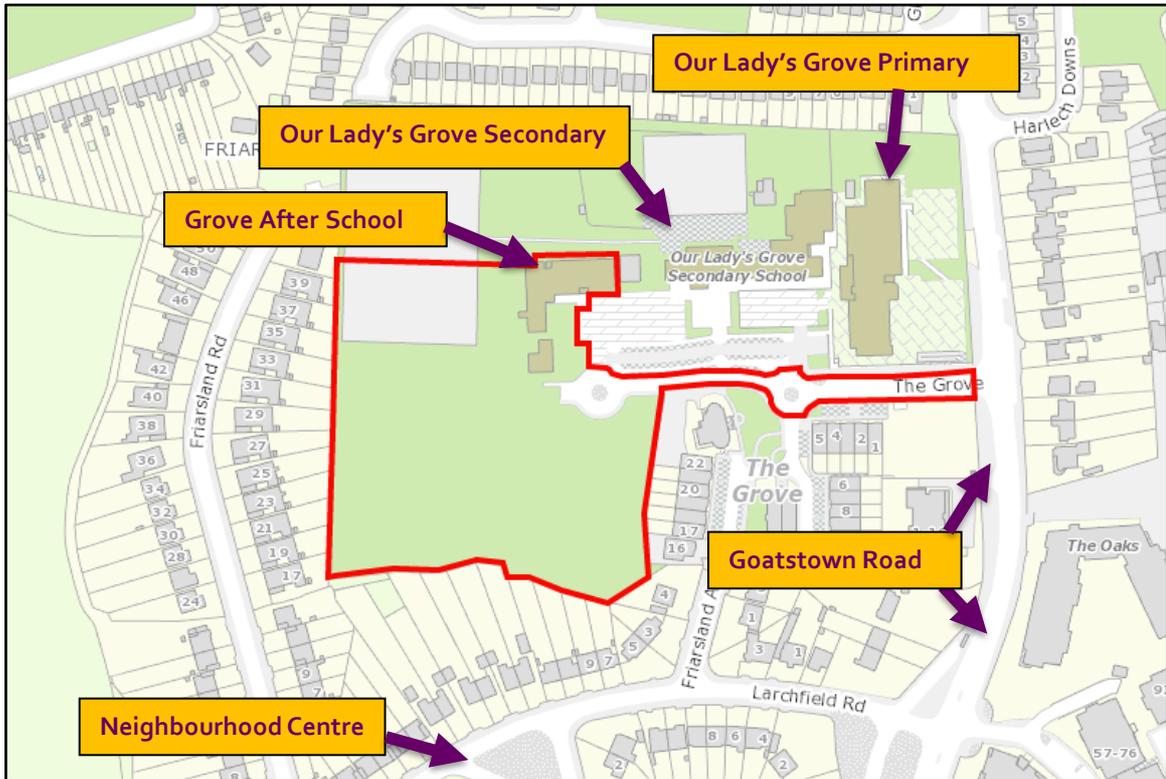


Figure 3.1: Map Indicating the Location of the Subject Site

Source: Myplan.ie (Annotated by Thornton O'Connor Town Planning, 2020)

The subject site includes an internal circulation road which connects the Goatstown Road with Our Lady's Grove Primary and Secondary School and a childcare facility known as 'Goatstown After School'.

The subject site is predominantly comprised of greenfield lands but also includes the Goatstown Afterschool premises. The subject site also contains an existing roundabout which connects to the internal roadway that leads to the Goatstown Road.

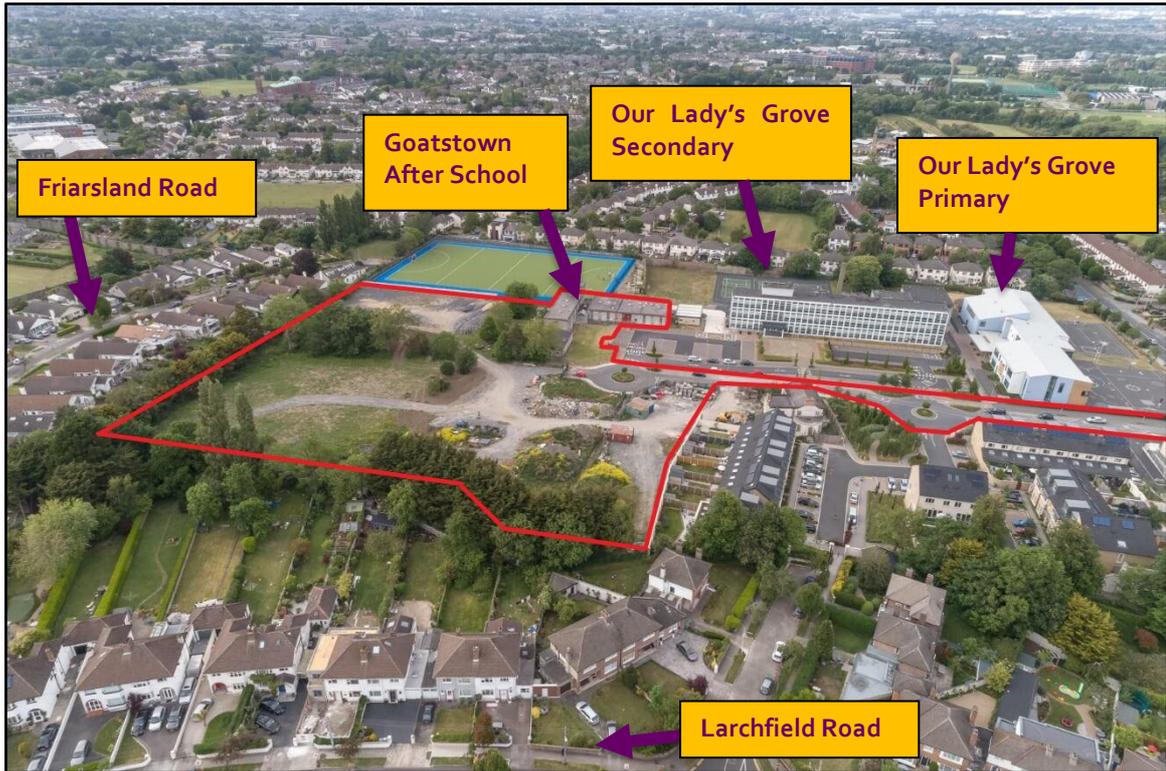


Figure 3.2: Aerial View of the Subject Site and Surrounding Context

Source: Google Maps (Annotated by Thornton O'Connor Town Planning, 2020)

3.2 Site Context

The surrounding context of the subject site is generally characterised by established low-density residential dwellings. The site is bounded to the west and south by a mix of 2 No. storey and single storey houses along Friarsland Road and Larchfield Road, with their rear gardens directly abutting the site boundary. There is a recently constructed residential development known as 'The Grove' located along the eastern boundary of the subject site, which is comprised of 41 No. units of apartments, duplexes and houses arranged in five terraced blocks each with a height of 3 No. storeys. The north eastern and northern boundaries of the subject site directly adjoin the lands of Our Lady's Grove Secondary School.

The northern redline boundary of the subject site previously dissected a hockey pitch belonging to the adjacent secondary school. However, the re-orientation of this pitch, to run parallel to the northern site boundary, was granted permission under DLRCC Reg. Ref. D18A/0387 and ABP Ref. PLo6D.302898. As such the hockey pitch has been recently re-aligned and no longer dissects the redline boundary. Further information in relation to this recent grant of permission is outlined in Section 4.2.1 of this Report.

There is a neighbourhood centre located within a 5 minute walk (c. 350m) to the south of the subject site at the junction of Farmhill Road and Larchfield Road. The neighbourhood centre is comprised of approximately 9 No. commercial units including, but not limited to a local shop with a delicatessen and post office, a café, a pharmacy, a health clinic, a dentist, a beauty salon, a hair salon and a clothes shop. The neighbourhood centre also includes an estate agent, a solicitor's office and an accountancy firm. There is a further neighbourhood centre approx. 700m to the

north of the subject site at Clonskeagh that includes uses such as a convenience store, off-licence, hair salon, pharmacy and restaurant.

3.3 Site Accessibility

The subject site is located approximately 5km to the south of Dublin city centre, 1km to the north east of Dundrum and 850m to the south west of University College Dublin.

3.3.1 Public Transport

The Luas Green line is within easy reach of the subject site with the Dundrum stop (1.07km distance as the crow flies) approximately a 19 No. minute walk or 6 No. minute cycle away and the Windy Arbour stop (1.01km distance as the crow flies) approximately a 27 No. minute walk or 8 No. minute cycle.

The Goatstown Road, which is connected to the main development area of the subject site by an internal road which is approximately 200m long, is a priority bus corridor served by the No. 11 bus which runs from Wadelai Park to the Sandyford Business District every 30 No. minutes.

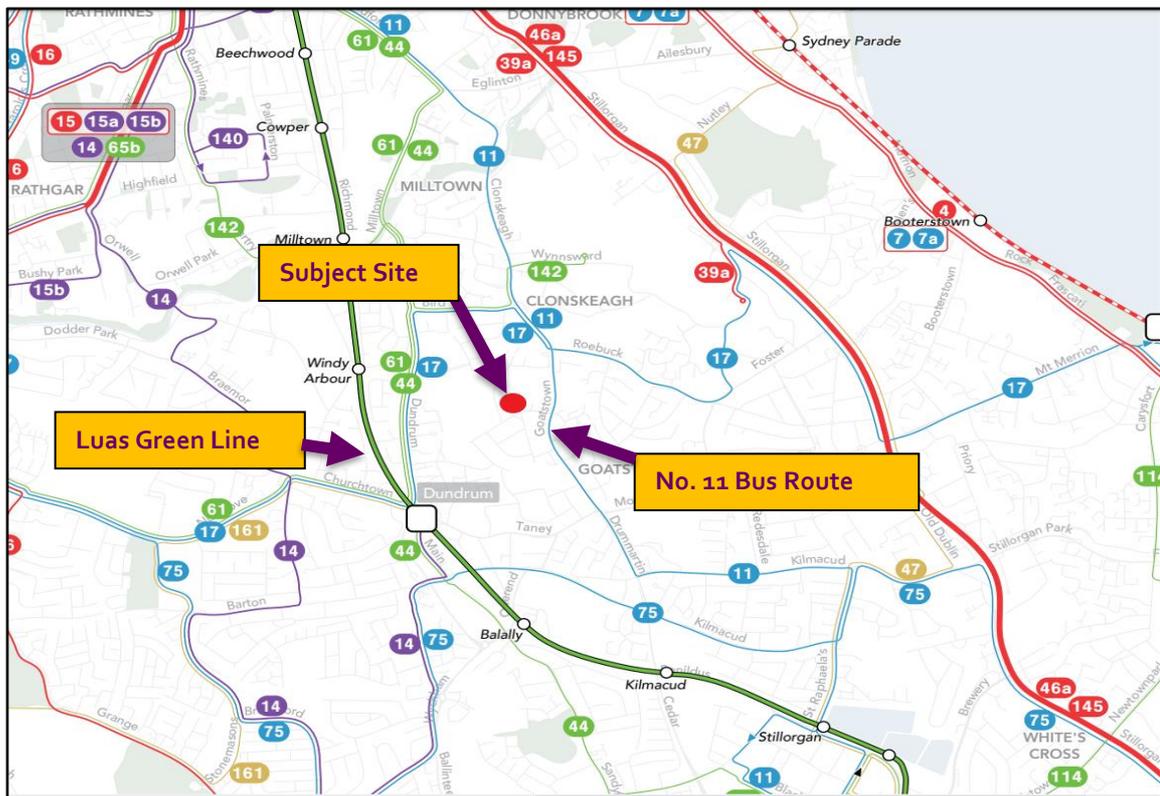


Figure 3.3: Map Showing Existing Public Transport Network (Subject Site Annotated by Red Dot)

Source: Busconnects.ie (Annotated by Thornton O'Connor Town Planning, 2020)

The BusConnects Plan was launched by the National Transport Authority in May 2017 and is described as 'a plan to fundamentally transform Dublin's bus system, so that journeys by bus will be fast, reliable, punctual, convenient and affordable. It will enable more people to travel by bus than ever before and allow bus commuting to become a viable and attractive choice for employees, students, shoppers and visitors.'

The BusConnects Plan contains 3 No. key elements, namely the Dublin Area bus network redesign project; fare and ticketing enhancements; and better-quality bus infrastructure, including the Core Bus Corridors Project.

Figure 3.4 below shows the proposed amendments to the Dublin Bus network. As a result of the proposed amendments, the subject site will be served by the No. 86 which will run every 30 minutes from the Ticknock, along the Goatstown Road to Mountjoy Square.

The proposed new S4 route has a peak frequency of every 10 minutes running from University College Dublin to Liffey Valley, along Bird Avenue which is located approximately 500m north of the subject site. This route will connect with the Luas Green line and a number of arterial high frequency routes running into the city centre.

The proposed new S6 route has a peak frequency of every 15 minutes running from Tallaght to Blackrock via Dundrum and UCD, through the junction of the Goatstown Road and Taney Road approximately 850m to the south east of the subject site.

There are also 2 No. radial routes which travel along the Dundrum Road, c. 870m to the west of the subject site. The routes in question are the No. 87 which runs from Belamine to Mountjoy Square via Dundrum and the No. 88 which runs from Enniskerry to Mountjoy Square via Dundrum. Both of these routes have a 60 minute frequency.

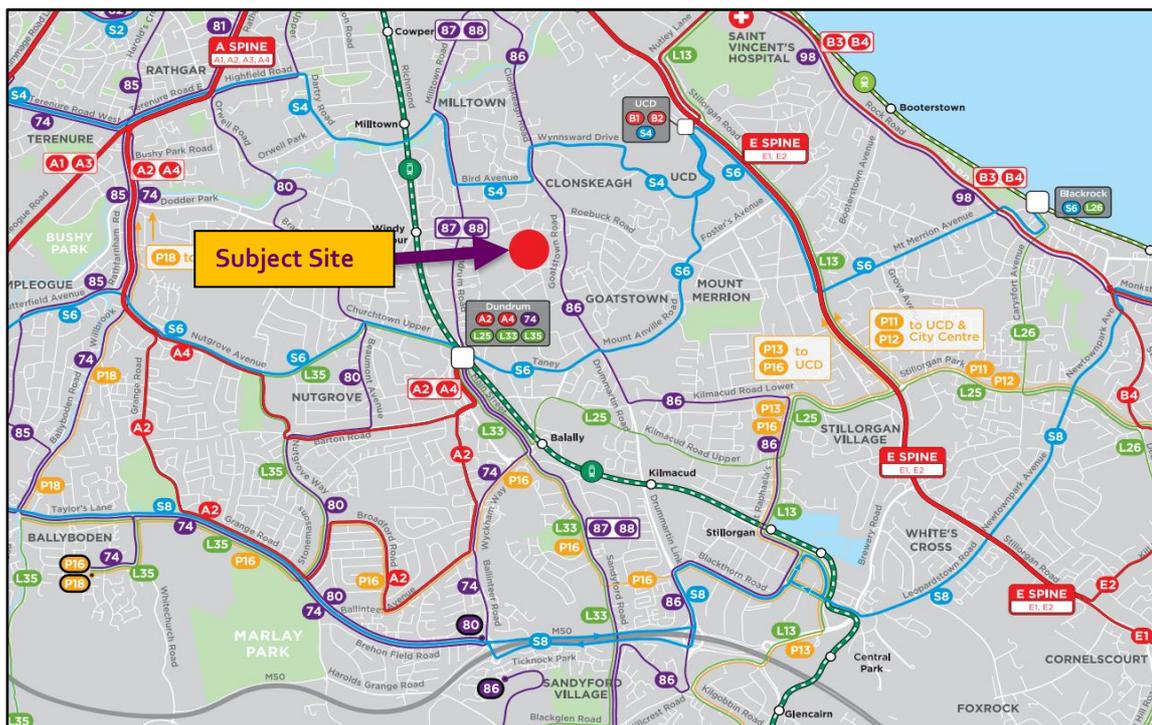


Figure 3.4: Map Showing Proposed Bus Network (Subject Site Annotated by Red Dot)

Source: Busconnects.ie (Annotated by Thornton O'Connor Town Planning, 2020)

It is important to note that the proposed network amendments of the BusConnects project are currently under consultation and may be subject to change. However, the stated intent of the network amendments is to provide connections to multiple services in order to facilitate quicker journey times, through simple transfers to other services at key intersections between routes.

3.3.2 The Greater Dublin Area Cycle Network

The Greater Dublin Area Cycle Network (2013) outlines the long-term plan of the National Transport Agency (NTA) for the expansion of the cycle network to advance the provision of improved cycling facilities for the Dublin Region. These improvements range from basic cycle lanes on existing streets, segregated paths where there is space to do so, and Greenways along major rivers and the Royal and Grand Canals.

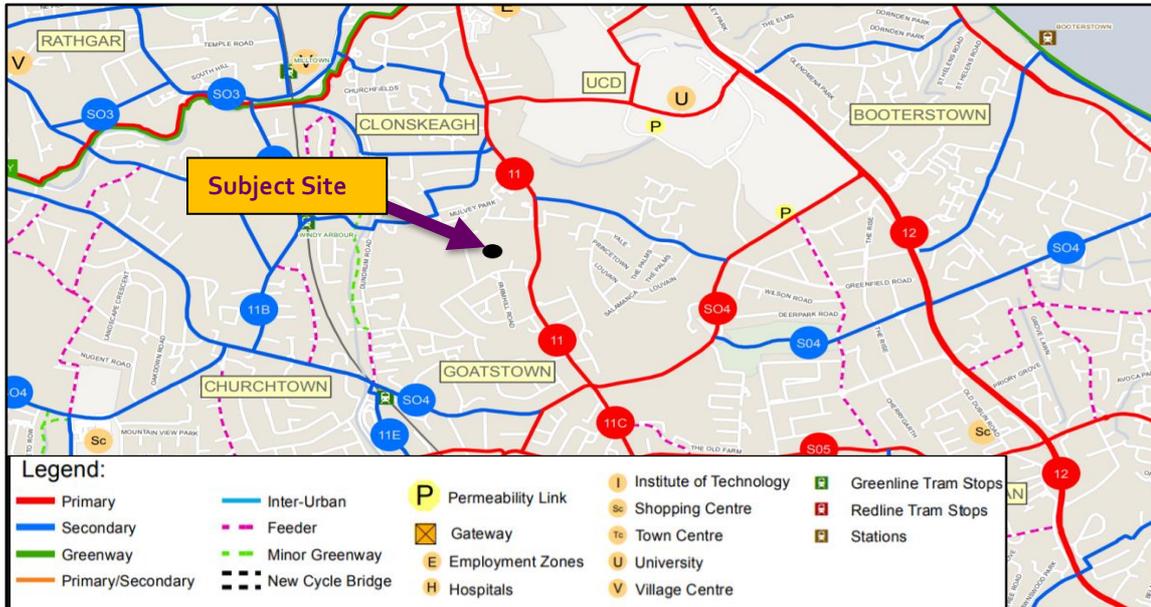


Figure 3.5: Proposed Greater Dublin Area Cycle Network (Subject Site Annotated by Black Dot)

Source: Greater Dublin Area Cycle Network Plan Sheet N7 (Annotated by Thornton O'Connor Town Planning)

As demonstrated in Figure 3.5 above, the subject site is adjacent to the proposed Route No. 11, a primary radial route from Camden Street to the South-Central Sector via the Goatstown Road.

In July 2020, Dún Laoghaire Rathdown County Council released details of a scheme to upgrade the cycle network along the Goatstown Road, providing a kerb to segregate and protect cyclists from vehicular traffic.

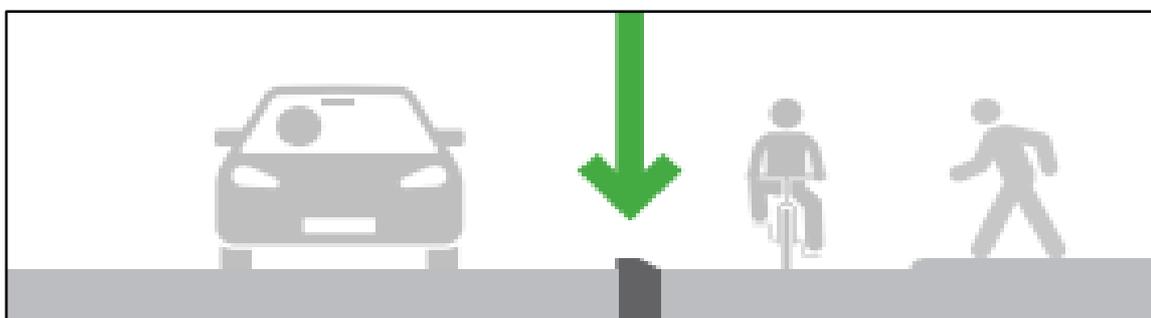


Figure 3.6: Image Showing the Raised Concrete Separator Kerb Proposed Along the Goatstown Road

Source: Dún Laoghaire Rathdown County Council Cycle Upgrade Scheme, 2020

The scheme proposes the installation of a raised concrete separator kerb along a 1.2km stretch of the Goatstown Road on both sides of the carriageway from the Taney Road junction to the Roebuck Road junction, with the kerbs dropped to carriageway level to allow access to driveways, side roads, bus stops and drainage.

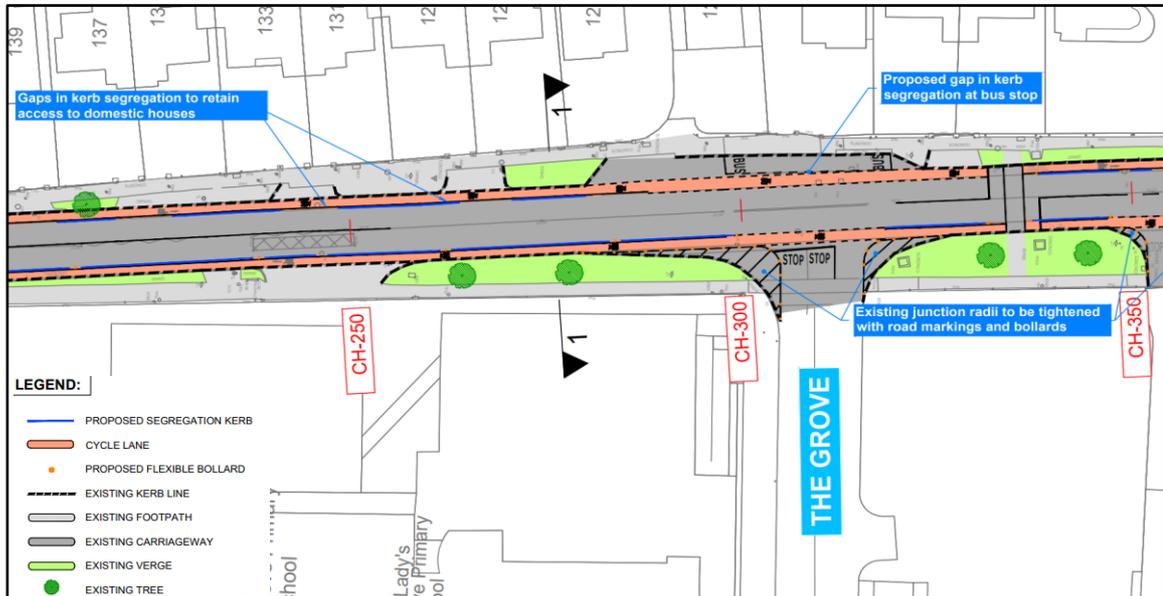


Figure 3.7: Extract from Goatstown Road Protected Cycle Lanes Sheet 1 of 5

Source: Dún Laoghaire Rathdown County Council Cycle Upgrade Scheme, 2020

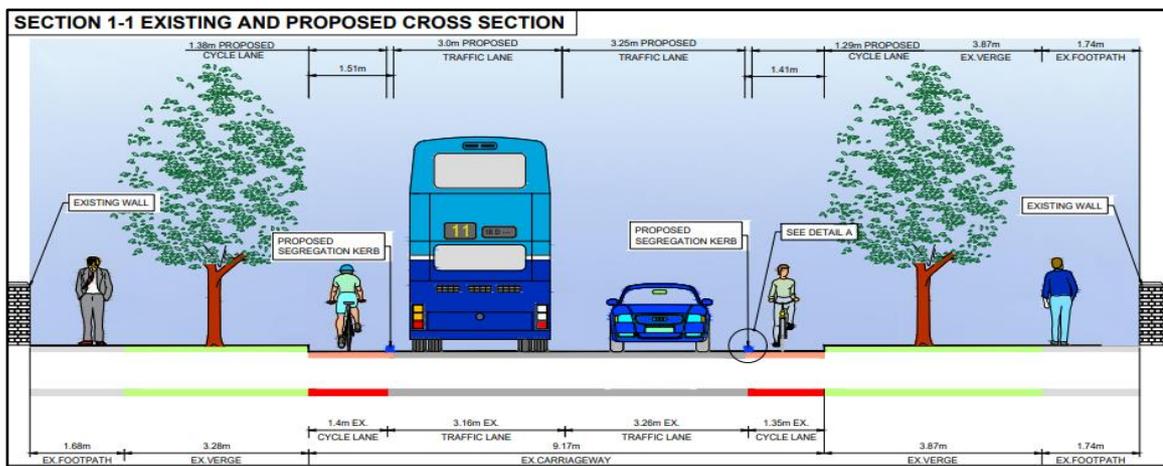


Figure 3.8: Extract from Goatstown Road Protected Cycle Lanes Sheet 1 of 5 Showing the Existing and Proposed Cross Section along the Goatstown Road

Source: Dún Laoghaire Rathdown County Council Cycle Upgrade Scheme, 2020

As demonstrated in Figures 3.7 and 3.8 the proposed cycle network upgrades will result in the installation of additional road markings and bollards at the vehicular entrance to the subject site, off the Goatstown Road. These measures will improve the safety of cyclists travelling along the Goatstown Road and entering and exiting the subject site of the proposed development.

The proposed upgrades to the Goatstown Road cycle network are due to be completed in early 2021.

4.0 National Policy

This section will demonstrate that the proposed development has been brought forward with due consideration of National Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against:

- *Project Ireland 2040 – National Development Plan 2018-2027;*
- *Project Ireland 2040 – The National Planning Framework;*
- *National Spatial Strategy 2002-2020;*
- *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
- *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
- *Guidelines for Residential Developments for 3rd Level Students (1999);*
- *National Student Accommodation Strategy (2017); and*
- *The Planning System and Flood Risk Management (2009).*

4.1 ***Project Ireland 2040 – The National Development Plan 2018-2027***

The *National Development Plan 2018 – 2027* document underpins the overarching message of the *National Planning Framework*. The publications set out how Strategic Investment Priorities are aligned with public capital investments over the next ten years to achieve each of the National Strategic Objectives as set out in the *National Planning Framework*. The context of the National Development Plan is illustrated in Figure 4.1 below.

The National Planning Framework published alongside the National Development Plan has 10 No. National Strategic Outcomes. The relevant strategic outcomes and objectives are discussed below at Section 4.2. of this report.

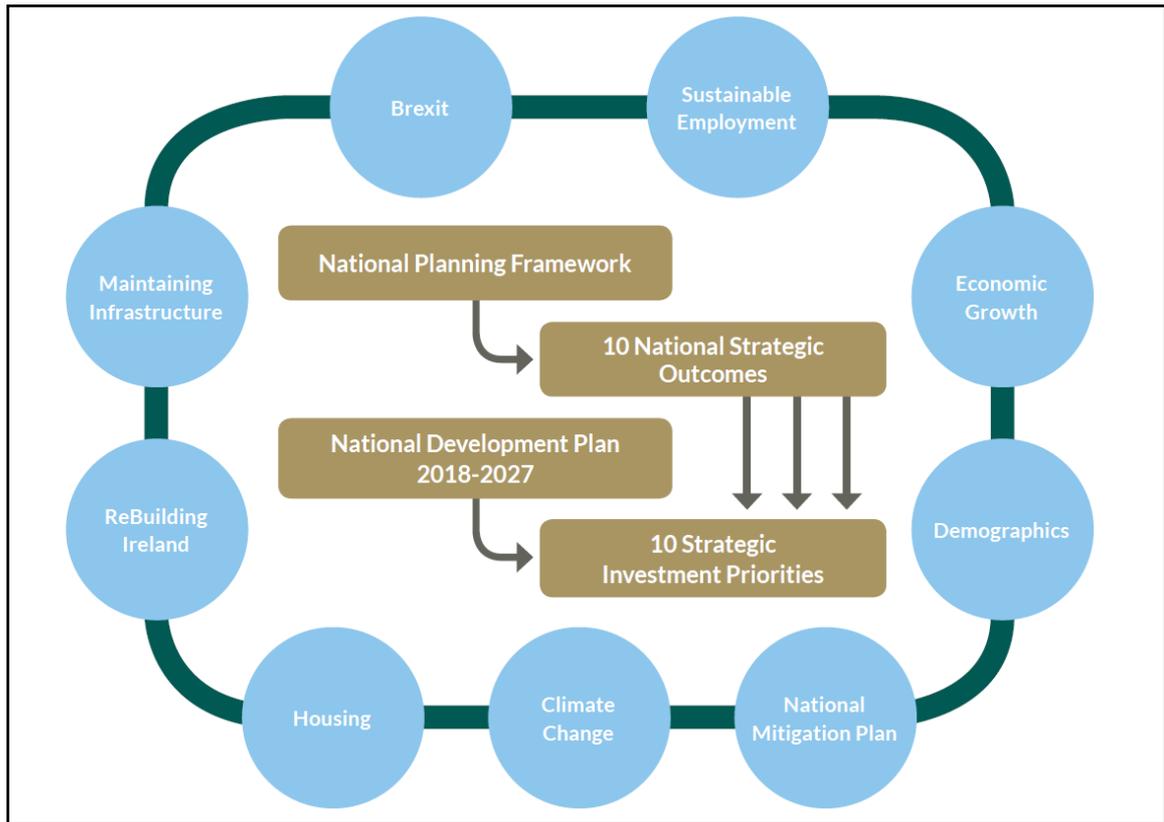


Figure 4.1: Context of the National Development Plan.

Source: *Project Ireland 2040 National Development Plan 2018 -2027.*

4.2 Project Ireland 2040: National Planning Framework

4.2.1 Introduction

Project Ireland 2040: National Planning Framework (‘the NPF’) is the Government’s high-level overarching strategic plan that aims to shape the future growth and development of the country.

The NPF identifies a number of national strategic outcomes, trends and themes arising in Ireland:

- Compact Growth;
- Enhanced Regional Accessibility;
- Strengthened Rural Economies and Communities;
- Sustainable Mobility;
- A strong Economy supported by Enterprise, Innovation and Skills;
- High Quality International Connectivity;
- Enhanced Amenity and Heritage;

- Transition to a Low Carbon and Climate Resilient Society;
- Sustainable Management of Water, Waste and other Environmental Resources; and
- Access to Quality Childcare, Education and Health Services.

A core principle of the NPF is to:

'Allow for choice in housing location, type, tenure and accommodation in responding to the need', in addition to tailoring the 'scale and nature of future housing provision to the size and type of settlement to where it is planned to be located.'

The NPF calculates that *'between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs of well-located and affordable housing, with increasing demand to cater for one and two person households'*

In relation to Student Accommodation the NPF notes that:

'Demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas in particular. In the years ahead, student accommodation pressures are anticipated to increase. The location of purpose-built student accommodation needs to be proximate as possible to the centre of education, as well as being connected to accessible infrastructure such as walking, cycling and public transport. The National Student Accommodation Strategy supports these objectives.' [Our Emphasis.]

The subject scheme proposes a high-quality purpose-built student accommodation scheme which is ideally located proximate to University College Dublin. As such, the scheme will contribute positively towards increasing the supply of much needed student accommodation in line with the objectives of the National Planning Framework.

Section 3.2 of the Planning Report prepared by Thornton O'Connor Town Planning, a copy of which is enclosed with this Planning Application, includes a detailed assessment of the demand for Student Accommodation. The assessment found that there are 5,945 No. purpose-built Student Accommodation bedspaces available to the 32,387 No. students enrolled in University College Dublin. The subject scheme of this Planning Application will contribute positively towards addressing the apparent deficit in appropriate Student Accommodation.

A number of key national policy objectives are outlined in the NPF in order to successfully achieve the 10 No. Strategic Outcomes outlined in section 4.2.1 of this report. An assessment of the NPF with regard to the subject scheme has been undertaken, with the following National Policy Objectives applicable to the proposed development at the subject site:

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;

- Scale, Massing and Design;
- Justification and Housing Need;
- Waste Environmental Issues; and
- Implementing the National Planning Framework.

4.2.2 Population Growth and Employment

The National Planning Framework sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the 5 No. main cities. The following objectives are considered to be the most relevant to the subject scheme of this planning application:

- **National Policy Objective 1b** projects that the population of the Eastern and Midland Region will increase by 490,000 – 540,000 additional people.
- **National Policy Objective 2a** – A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.
- **National Policy Objective 3a** – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- **National Policy Objective 3b** – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.
- **National Policy Objective 4** - 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.
- **National Policy Objective 5** – Develop cities, towns and villages of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.
- **National Policy Objective 11** – In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

The NPF states that proposals should:

'prioritise the location of new housing provision in existing settlements as a means to maximizing a better quality of life for people through accessing services; ensuring a more efficient use of land and allowing for greater integration of existing infrastructure.' [Our Emphasis].

The NPF outlines that compact development is the preferred approach which would focus on:

'reusing previously developed, 'brownfield' land, building up infill sites, which may not have been built on before and either reusing or redeveloping existing sites and buildings.' [Our Emphasis].

The proposed development is located on an underutilised site, that is well served by public transport and is in close proximity to University College Dublin.

Communal amenity spaces are provided within the scheme such as the gymnasium, cinema room and external amenity spaces. These high quality, attractive and liveable spaces are where the residents will principally interact with each other ensuring an integrated student community within the scheme.

The proposed scheme involves the development of an underutilised infill site and therefore is fully in accordance with the preferred approach of the NPF and will also encourage social interaction between the residents of the scheme by providing high-quality communal spaces.

4.2.3 Current Trends in Tenure and Household Formation in Ireland

The NPF acknowledges that Ireland's housing crisis has resulted in:

'a time when many people, including those on average incomes, wish to live close to where they work and the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained'.

The following National Policy Objectives response to the changing nature of Household Formation and trends in tenure in current planning discourse.

- **National Policy Objective 6** – Regeneration and rejuvenate cities, towns and villages of all types of scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.
- **National Policy Objective 11** – outlines that there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages.

- **National Policy Objective 32** – Details the target of delivering 550,000 No. additional households to 2040.

The proposed development providing 698 No. student accommodation bedspaces will positively contribute towards addressing the deficit in purpose-built student accommodation within Dublin.

The subject scheme represents proper planning and sustainable development as the site is capable of supporting increased density and height in line with recent National Policy and the future residents of the scheme will benefit from the site's close proximity to University College Dublin which is accessible by foot, by bicycle and by public transport.

4.2.4 Sustainable Modes of Transport

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered to be the most applicable to the proposed mixed-use development at the subject site.

- **National Policy Objective 26** – Outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with Planning Policy.
- **National Policy Objective 27** – Aims to ensure the integration of safe and convenient alternatives to the car into the design of our communities by prioritising walking and cycling accessibility to both the existing and proposed developments and integrating physical activity facilities for all ages.

As noted in Section 3.3, the proposed development is well served by public transport with a number of bus stops located in close proximity to the subject site providing ease of access to the city centre and the Greater Dublin Area.

As outlined in Section 3.4, the subject site is in close proximity to University College Dublin, which is easily accessible by foot, by bicycle and by public transport, thus encouraging future residents of the scheme to avail of more sustainable modes of transport.

4.2.5 Scale, Massing and Design

The National Planning Framework sets out a number of planning policy objectives that specifically relate to the Scale, Massing and design of developments. The following objectives are considered to be most applicable to the subject scheme.

- **National Policy Objective 13** outlines that to achieve well-designed high-quality outcomes performance-based standards will be put in place such as building height and car parking.

- **National Policy Objective 33** states residential development at appropriate scales within sustainable locations will be prioritised.
- **National Policy Objective 35** outlines the requirement to '*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.*'

The NPF also sets out that:

'to effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards rather than outwards.' [Our Emphasis]

The maximum overall height of the proposed development is 18.030m from ground level (an equivalent of 6 No. storeys from ground level). It should be noted that the maximum height of the subject scheme when read from the north courtyard is 7 No. storeys, however the north courtyard is positioned at lower ground floor level and thus the scheme will be legible as 6 No. storeys from surrounding locations external to the site. Furthermore, the uppermost level of the north, middle and south blocks has been set back from the building line, with planting adopted at shoulder level. The scale, massing and siting of the blocks have been carefully considered to ensure that it can be assimilated into its receiving context. There is a significant importance placed in the NPF to increase building heights and densities in existing urban areas. The heights proposed on parts of the subject site (part 3 to part 6 No. storeys over lower ground level, with the highest elements setback to reduce the potential for impact on adjacent existing residential dwellings) facilitate increased density at the lands and are appropriate given the site's location in an existing built-up area and its proximity to public transport and University College Dublin.

In designing the subject scheme, cognisance was given to the scheme previously permitted by An Bord Pleanála but subsequently quashed by the High Court. As previously outlined in Section 3.0 of this Report, the orientation and siting of the proposed blocks was changed from the scheme previously permitted by An Bord Pleanála but later quashed following Judicial Review, with the blocks turned 90° to reduce the impact on dwellings to the west. The setback distance between the proposed blocks and the redline boundary has increased at the northern, western and southern boundaries of the subject site.

The subject scheme represents the appropriate densification of this key underutilised site within close proximity to University College Dublin.

A Student Management Plan for the proposed development is enclosed with this Planning Application. The Management Plan outlines how the subject scheme will be appropriately managed to ensure the protection of the residential amenity of surrounding properties.

4.2.6 Waste and Environmental Issues

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Waste and Environmental issues.

The following objectives are considered to be most applicable to the proposed development of this planning application:

- **National Policy Objective 52** sets out the planning systems must respond to the environmental challenges and have regard to relevant environmental legislation.
- **National Policy Objective 53** is concerned with supporting greater land efficiency and use of renewable resources by reducing the rate of urban sprawl and new development.
- **National Policy Objective 54** aims to reduce the carbon footprint by integrating climate action into the planning system.
- **National policy Objective 56** sets out the intentions to sustainably manage waste generation.
- **National Policy 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective 63** aims to ensure that efficient and sustainable management and conservation of water resources and water services infrastructure.
- **National Policy Objective 64** aims to improve air quality through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport.
- **National Policy Objective 75** stipulates that *'all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate'*.

As outlined at Section 4.2.3, the subject site is a key underutilised infill site ideally located for student accommodation given its proximity to University College Dublin.

The proposed development will encourage the use of public transport, walking and cycling, in accordance with National Policy Objective 64 which sets out to improve air quality through promoting development that facilitates sustainable modes of transport.

The proposed scheme provides for 9 No. car parking spaces, 4 No. motorcycle spaces and 860 No. bicycle parking spaces. The proposed scheme will therefore result in a lower carbon footprint and would be consistent with National Policy Objective 54 which aims to reduce the carbon footprint in the planning system.

The proposed development is supported by the following reports which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues:

- Environmental Report prepared by Thornton O'Connor Town Planning;
- Appropriate Assessment Screening by Scott Cawley Limited;
- Ecological Impact Assessment by Scott Cawley Limited;
- Flood Risk Assessment prepared by DBFL Consulting Engineers;
- Operational Waste Management Plan prepared by AWN Consulting;
- Construction and Demolition Waste Management Plan;
- Construction Management Plan; and
- Noise Impact Assessment prepared by AWN Consulting.

4.2.7 Implementing the National Planning Framework

With regard to implementing the National Planning Framework, the following objective is considered to be applicable to the proposed scheme subject of this report.

The **National Policy Objective 74** states that proposals should '*secure the alignment of the National Planning Framework and the National Development Plan through the delivery of the National Strategic Outcomes.*'

This section will set out how the proposed development is consistent with the relevant objectives of *Project 2040: National Planning Framework* which will contribute towards achieving the 10 No. National Strategic Outcomes also identified in the NPF as follows:

Consistency with National Strategic Outcomes			
No.	Objective?	How it is Addressed by this development?	Meet criteria?
1:	Compact Growth;	Sustainable and Efficient Redevelopment of an Infill site.	Yes

2:	Enhanced Regional Accessibility;	Proximity to Dublin Bus routes and walkable distance to the LUAS, connecting the subject site to the surrounding area, Dublin city centre and beyond.	Yes
3:	Strengthened Rural Economies and Communities;	N/A – Urban Area	N/A
4:	Sustainable Mobility;	Reduced provision of car parking – Promoting Active and Sustainable Transport due to proximity to University College Dublin which will encourage use of sustainable modes of transport (i.e. walking and cycling).	Yes
5:	A Strong Economy supported by Enterprise, Innovation, and Skills;	Close proximity to University College Dublin, providing access to much sought-after residential accommodation for students.	Yes
6:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A
7:	Enhanced Amenity and Heritage;	The scheme provides a high level of amenity space for future residents. The scheme will also provides public open space (7,956 sq m) in the form of a parkland area/linear nature trail and active recreational area which will be available to the wider local community.	Yes
8:	Transition to a Low Carbon and Climate Resilient Society;	Reduced car parking provision will encourage the use of sustainable modes of transport, particularly given the accessibility of University College Dublin by foot and by bicycle.	Yes
9:	Sustainable Management of Water, Waste and other Environmental Resources; and	Sustainable modes of transport encouraged, and sustainable management of water use and waste output, as detailed in accompanying reports.	Yes
10:	Access to Quality Childcare, Education, and Health Services;	There are a number of Hospitals and Healthcare facilities within close proximity to the subject site.	Yes

4.3 National Spatial Strategy 2002-2020

The *National Spatial Strategy (NSS)* is a twenty-year planning framework which aims to provide a better quality of living for people, a strong competitive economic position and an environment of the highest quality through informing the spatial development of the country as a whole.

It is noted that the administrative area of Dún Laoghaire Rathdown County Council, within which the subject site lies, forms part of the Greater Dublin Area (GDA).

The NSS outlines that:

'Population growth within and in many areas adjoining the GDA is being driven primarily by the investment dynamics of natural increase and high migration combined with a very high proportion of new jobs and investment continuing to be attracted to the Dublin Area.'

It is widely recognised that the GDA has experienced a rapid rate of growth in recent years that has been primarily accentuated by the Country's economic growth. The NSS recognises that strong growth results in a *'particularly heavy burden of development pressures, such as housing supply difficulties and traffic congestion, on the city and its surrounding area.'*

As a result, the NSS states that *'up to four-fifths of the population growth in the State could take place in or in areas adjoining the Greater Dublin Area over the next twenty years'*. In doing so, *'Dublin will continue to grow in population and output terms. However, it is not desirable for the city to continue to spread physically into surrounding counties. The physical consolidation of Dublin, supported by effective land use policies for the urban area itself, is an essential requirement for a competitive Dublin'*.

As the proposed development is located on an infill site, the scheme is in accordance with the aim of the NSS to restrict the spreading of the city outwards into surrounding counties and will help address the deficit in the supply of purpose-built student accommodation.

The NSS notes that *'it has been estimated that it will be necessary to provide some 500,000 additional dwellings to meet likely demand in the period up to 2010. Ireland's housing stock per thousand of population is the lowest in the EU at 327 housing units per thousand population as compared to 435 per thousand in the UK and a European average of 450 per thousand'* which is reiterated in National Policy Objective 32 of the NPF. Although this quote is now out of date, Ireland is currently in the midst of a housing crisis and additional housing is therefore urgently required.

The proposed development will contribute positively towards addressing the deficit in purpose-built student accommodation in Dublin.

The proposed development will ease the pressure on the private rented sector as the residents of the 698 No. bedspaces will be more appropriately accommodated within the purpose-built student accommodation scheme as opposed to within the private rented sector.

The NSS sets out a number of criteria for the location of housing within urban areas, the most relevant of which are set out below:

- The Carrying Capacity Test – Is the environmental setting capable of absorbing development in terms of drainage etc.?

Please find enclosed an Engineering Infrastructure Report and Drawings prepared by DBFL Consulting Engineers which details the proposed foul drainage arrangements, stormwater drainage arrangements and watermain infrastructure arrangements demonstrating that the development can be appropriately absorbed.

- The Transport Test - Is there potential for reinforcing usage of public transport, walking and cycling?

The proposed development will promote and encourage sustainable modes of transport. The subject site is well serviced by public transport, in addition to the opportunities for residents to walk and cycle to University College Dublin, and other services and facilities.

Due to the location of the subject site, the proximity to University College Dublin, access to public transport and the profile of future residents, there is a reduced level of car parking proposed for the subject scheme.

Therefore, it is considered that the proposal represents proper planning and sustainable development.

- The Character Test – Will the proposal reinforce a sense of place and character?

The proposal will result in the sustainable development of an underutilised infill site in close proximity to University College Dublin.

The layout of the proposed development comprising of 698 No. student accommodation bedspaces and ancillary facilities with generous public open spaces will retain the open parkland character of the subject lands.

Furthermore, the NSS states that:

*'efficient use of land by consolidating existing settlements, focusing in particular on development capacity within **central urban areas** through **re-use of under-utilised land** and buildings as a priority, rather than extending green field development.'* [Our Emphasis]

The subject development proposes the reuse of an underutilised, infill site in proximity to University College Dublin. Therefore, the proposed development represents the proper planning and sustainable development of the area.

The development is consistent with the policy guidance as set out within the *National Spatial Strategy 2002 – 2020*.

4.4 Action Plan for Housing and Homelessness, Rebuilding Ireland (2016).

The *Action Plan for Housing and Homelessness – Rebuilding Ireland* is the Government’s publication which recognises that significant increase in new homes that is needed and the scale and speed to which they are required. The Action Plan outlines a 5 No. pillar approach;

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 3 and Pillar 4.

- Pillar 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.
- Pillar 4: Improve the Rental Sector – Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

The Action Plan notes that the student population is projected to grow by around 20,000 students (or 15%) to approximately 193,000 No. students by 2024. The Action Plan also notes that the *Report on Student Accommodation: Demand and Supply* (2015) by the Higher Education Authority estimates that approximately 25,000 No. student bed spaces will be required nationally to meet the increase in demand resulting from the growth of the student population.

The Action Plan commits to:

‘The development of a national student accommodation strategy in 2017 by the Department of Education and Skills (DES) in conjunction with the DHPCLG and other stakeholders, including DPER and the Department of Finance. This will set out a broad framework for delivery of an enhanced level of accommodation which will inform local authority housing strategies and the land management process in general, in order to provide suitably located and affordable sites’.

To address the accommodation needs of the growing student population, there are a number of key actions listed in the Action Plan, particularly under Pillar 4 which are relevant to the development of student accommodation.

Key Action No. 4.7

Key Action No. 4.7 states that the Action Plan will:

‘Prepare and publish a national student accommodation strategy, which will set out a broad framework for delivery of an enhanced level of accommodation and which will inform local authority housing strategies and the land management process in general, in order to provide suitably located and affordable sites’.

The stated objective for the key action No. 4.7 is:

'To develop a national policy on specific needs and mechanisms for the development of appropriate on-campus and off-campus student accommodation.'

Key Action No. 4.8

Key Action No. 4.8 states that the Action Plan:

'Will work with stakeholders to prioritise and progress viable projects to provide additional student accommodation in key urban areas'.

The stated objective for key action No. 4.8 is:

'To bring on stream proposals capable of delivering an additional 7,000 student accommodation places by the end of 2019, on or off-campus, in addition to projects already committed to'.

Key Action No. 4.10

Key Action No. 4.10 states that the Action Plan will:

'Help to fund a Student Housing Officer to work with the Union of Students in Ireland, local authorities, AHBs and housing providers, to identify and expand short-term capacity enhancing measures in the student accommodation sector'.

The stated objective for key action No. 4.10 is:

'To assist students in finding appropriate accommodation'.

Key Action No. 4.13

Key Action No. 4.13 outlines the intention to:

'Enable student accommodation projects for 100 No. units or more to go straight to An Bord Pleanála, as well as maximise the opportunities for joint venture projects on local authority sites to proceed through the Part 8 process and prepare guidance on planning policies around student accommodation developments'.

The stated objective for Key Action No. 4.13 is:

'To enhance certainty and reduce delivery timescales and costs associated with bringing student accommodation proposals forward'.

4.5 National Student Accommodation Strategy (2017)

The *National Student Accommodation Strategy (2017)* provides guidance and an evidence base for the delivery of Purpose-Built Student Accommodation (PBSA). Student Accommodation, especially that of the PBSA variety has the potential to release a lot more of the rental market to meet housing demand.

Within the Strategy introduction it is noted that:

'The impact of an additional 21,000 student accommodation bedspaces, in addition to an additional 1,500 digs spaces, will free up at least an additional 5,000 rental units for the wider rental sector.'

Ireland's higher education sector has been an important engine of our economic success and continues to grow and expand. The demand for higher education contributes to housing demand within our already constrained supply. Additional demand for housing around Higher Education Institutions, means that there is an increase in demand on many types of housing, especially the rental sector. With demand for higher education spaces expected to rise by up to 27% more by 2030, demand for accommodation is also anticipated to rise sharply.

Thus, the strategy recognises the following in relation to the role Student Accommodation can play in housing supply, and planning outcomes:

'Appropriately located high-quality, purpose-built and professionally managed student accommodation, can make educational institutions more attractive to students from Ireland and abroad, and can also become a revitalizing force for regeneration areas.'

The *National Student Accommodation Strategy (2017)* states that as of 2016 some 179,354 No. students enrolled for full-time courses in Higher Education Institutions in Ireland. This sizeable population requires appropriate housing which suits the economic and academic needs of student life and wellbeing. The report recognised there is emerging pent up demand for spaces which are not currently being met by permitted developments.

This demand is only set to increase with Minister for Further and Higher Education Simon Harris announcing that almost 5,000 additional university spaces have been secured for the 2021/22 academic year¹.

Through the provision of 698 No. student accommodation bedspaces the subject scheme can contribute positively towards addressing the deficit in the supply of purpose-built student accommodation bedspaces in Dublin.

Colbeam Limited will appoint a management company for the proposed scheme that will have a proven track record in managing high-quality student accommodation schemes.

4.6 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

The Guidelines set out that a key objective of the NPF is to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.

¹ <https://www.irishtimes.com/news/politics/next-academic-year-will-see-5-000-extra-students-at-college-compared-to-2-years-ago-1.4458718>

The Minister's foreword to the *Urban Development and Building Heights Guidelines, December 2018* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas. This is regarded in the guidelines and literature as an unsustainable model in need of proactive and inventive solutions.

The *Building Height Guidelines* state that there is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards.

The *Building Height Guidelines* note that:

'A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.' [Our Emphasis].

These Guidelines are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards. The Guidelines note that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and our planning process must actively address how this objective will be secured.

4.6.1 SPPR 3

SPPR₃ of the Building Height Guidelines sets out that:

'It is a specific planning policy requirement that where;

(A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria [below]; and*

2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.'

The Guidelines also note the following:

*'In relation to the assessment of individual planning applications and appeals, it is Government policy that **building heights must be generally increased in appropriate urban locations**. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.'* [Our Emphasis].

As increased heights are proposed at the subject site, we have demonstrated how the proposed development satisfies the specified criteria set out in Section 3 of the Height Guidelines as follows:

Development Management Criteria	
At the Scale of the Relevant City/ Town	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i> 	<ul style="list-style-type: none"> The subject site has excellent public transport accessibility, as detailed in the accompanying Planning Report and the Transport Statement submitted with this application. The subject site is considered eminently suitable for student accommodation given the availability of sustainable modes of transport.
<ul style="list-style-type: none"> <i>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake landscape and visual assessment (LVIA), by a suitably qualified practitioner such as a chartered landscape architect.</i> 	<ul style="list-style-type: none"> It is our professional opinion that the proposed scheme will successfully assimilate into the surrounding context. A Daylight/Sunlight Analysis and Landscape Visual Impact Assessment have been carried out, both of which demonstrate that no significant negative impacts will occur.
<ul style="list-style-type: none"> <i>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</i> 	<ul style="list-style-type: none"> The proposed scheme will make a positive contribution to the surrounding area by developing a key underutilised infill site. The development will integrate into the public realm by providing an additional institutional building next to an existing institutional, educational building. It will provide increased pedestrian footfall which will enhance the natural surveillance of the area throughout the day and evening. The height, scale and massing of the proposed scheme responds to the institutional nature of the lands and allows a sufficient and sustainable density of

	<p>development to be achieved through building vertically to reduce the site coverage of development, thus protecting the open space and character of the lands and ensuring generous public open space is afforded at ground level.</p> <ul style="list-style-type: none"> The subject scheme responds to its immediate surrounding context, through the orientation of the proposed blocks at a 90° angle to the western boundary thus reducing the potential for overlooking, overbearing and overshadowing of adjacent properties by facing the 'short' elevation in the direction of the third party dwellings to the west.
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Development Management Criteria	
At the scale of District/ Neighbourhood / Street	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</i> 	<ul style="list-style-type: none"> The high-quality design of the subject scheme will make a positive contribution to the area, particularly through the provision of public open space in the form of a linear parkland trail and parkland area in addition to an active recreation space that will also be publicly accessible.
<ul style="list-style-type: none"> <i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</i> 	<ul style="list-style-type: none"> The Design Statement prepared by Stephen Marshall Urbanism and enclosed with this application details the use of materials and the stepped height arrangement to break up the elevations of the proposed development.
<ul style="list-style-type: none"> <i>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)".</i> 	<ul style="list-style-type: none"> The subject scheme includes 7,956 sq m of Public Open Space in the form of a linear nature trail and parkland area, and active recreational space which will play a key role in protecting the open space and parkland character of the lands and providing a 'softer' landscape scheme. The Flood Risk Assessment prepared by DBFL Consulting Engineers and enclosed with this application concludes that there is an overall low risk level of flooding at the subject site.

<ul style="list-style-type: none"> • <i>The proposal makes a positive contribution to the improvements of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</i> 	<ul style="list-style-type: none"> • The high-quality design of the scheme will ensure the development will be an attractive addition to the area. • The inclusion of 7,956 sq m of public open space in the form of a linear nature trail/parkland and active recreational space, will contribute positively towards the retention of the open character of the subject site.
<ul style="list-style-type: none"> • <i>The proposal positively contributes to the mix of uses and/ or building / dwelling typologies available in the neighbourhood.</i> 	<ul style="list-style-type: none"> • As set out in the accompanying Planning Report, the proposed scheme seeks to contribute towards reducing the deficit of purpose-built student accommodation in Dublin. The subject site is ideally located, in close proximity to University College Dublin, which is readily accessible by foot, by bicycle and by public transport.

Development Management Criteria	
At the Scale of the Site/ Building	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i> 	<ul style="list-style-type: none"> • The Daylight/Sunlight Analysis demonstrates that all of the assessed bedspace clusters comfortably meet the BRE guidelines on average daylight factor. • The design of the subject scheme has evolved through a creative process, in conjunction with the results of the Daylight/Sunlight analysis to ensure an attractive living environment for future residents which has a limited impact on the surrounding residential amenity. • The design of the subject scheme, particularly the orientation of the blocks was carefully considered to minimise the potential for overlooking and overshadowing adjacent properties. The scheme includes angled windows along the northern edge of the site. • The design of the subject scheme has been carefully considered to ensure the

	<p>functional amenities such as bin stores have been located in areas of the subject site which may not have as much daylight/sunlight throughout the day as other parts of the subject site.</p>
<ul style="list-style-type: none"> • <i>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and an effective urban design and streetscape solution.</i> 	<ul style="list-style-type: none"> • As noted above, the Daylight/Sunlight Assessment ultimately concludes that the proposed development will have an imperceptible level of impact on the daylight and sunlight amenity of neighbouring properties. • The Report also notes that the future occupants will enjoy good levels of daylight/sunlight within the proposed development and have access to good levels of sunlight in the adjoining public amenity areas.

Development Management Criteria	
Site Specific Assessments	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measurements to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</i> 	<ul style="list-style-type: none"> • These assessments are generally required when buildings are at least 30 No. metres in height. Therefore, as the maximum overall height of the proposed development is 18.030m from ground level, it is considered that this assessment is not required.
<ul style="list-style-type: none"> • <i>In development locations in proximity to sensitive bird and/ or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/ or collision.</i> 	<ul style="list-style-type: none"> • An AA Screening Report and Ecological Impact Statement have been prepared by Scott Cawley Limited, copies of which are enclosed with this Planning Application. • The AA Screening process concluded that there will be no significant effects for any European sites. <p style="text-align: center;"><i>'Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded.'</i></p> <p>It is considered that the development will not be likely to lead to significant effects on the environment.</p>
<ul style="list-style-type: none"> • <i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i> 	<ul style="list-style-type: none"> • N/A
<ul style="list-style-type: none"> • <i>An assessment that the proposal maintains safe air navigation.</i> 	<ul style="list-style-type: none"> • N/A
<ul style="list-style-type: none"> • <i>An urban design statement including, as appropriate, impact on the historic built environment.</i> 	<ul style="list-style-type: none"> • A Design Statement prepared by Stephen Marshall Urbanism Limited has been submitted with the application. The scheme has been sensitively designed to integrate into

	<p>the surrounding context and protect the amenity of the surrounding residential dwellings.</p>
<ul style="list-style-type: none"> • <i>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i> 	<ul style="list-style-type: none"> • An AA Screening Report and Ecological Impact Statement have been prepared by Scott Cawley Limited, copies of which are enclosed with this Planning Application. <p>The AA Screening process concluded that there will be no significant effects for any European sites. It is considered that the development will not be likely to lead to significant effects on the environment.</p>

It is considered that the proposed development providing heights of part 3 to part 6 No. storeys over lower ground level and comprising 698 No. bedspaces of student accommodation at the subject site represents the proper planning and sustainable development of the area and is in accordance with the clear direction in recent national legislation to increase height and density in appropriate locations and the proposed development can be successfully assimilated into its context.

5.0 REGIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* and *Regional Spatial and Economic Strategy for the Eastern and Midlands Region*.

5.1 *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*

The *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* provides a long-term sustainable planning framework for the GDA. The Regional Planning Guidelines (RPGs) is a policy document which aims to direct the future growth of the Greater Dublin Area over the medium to long term.

The following Strategic Policies are considered relevant and have been assessed in respect of the proposed development:

Strategic Policy EP1 outlines the importance of the integration of climate change considerations into Development Plans, Flood Risk Assessments and Biodiversity and Heritage plans.

The proposed development has had due regard to climate change, flood risk and biodiversity. An Environmental Report prepared by Thornton O'Connor Town Planning is submitted with the application, in addition to a number of technical reports on specific environmental issues including an AA Screening Report and Ecological Impact Assessment. Therefore, the proposal is consistent with Strategic Policy EP1.

Strategic Policy PIP5 relates to waste management and aims to ensure environmental, business and public health needs are met. It also sets out to promote and facilitate reuse and recycling.

An Operational Waste Management Plan (OWMP) has been prepared by AWN Consulting and is enclosed as part of this application as supporting technical documents.

The OWMP notes that the waste strategy complies with all legal requirement waste policies and best practice guidelines and the '*implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development*'.

The proposal is therefore consistent with Strategic Policy PIP5.

Strategic Policy GIP2 aims to protect and conserve the natural environment, in particular EU designated sites.

The site is not located on or in close proximity to any EU designated sites.

An AA Screening Report prepared by Scott Cawley Limited is enclosed with this Planning Application. The Report concludes that:

'Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded.'

The proposal is consistent with Strategic Policy GIP2.

Strategic Policy GIP6 sets out to ensure the protection, enhancement and maintenance of the natural environment with specific emphasis on the value of green spaces.

Scott Cawley Limited have prepared an Ecological Impact Assessment, a copy of which is enclosed with this Planning Application. The Assessment concludes that:

'The landscape design will ensure that the biodiversity value of the habitats to be retained and created as part of the proposed development, are maximised. The proposed development does have the potential to result in significant negative effects on habitats (treelines), breeding birds and bats at local geographic levels. Following the implementation of mitigation measures, no residual impacts on any key ecological receptors is predicted.'

The proposal is consistent with Strategic Policy GIP6.

Strategic Policy SIP1 is in relation to planning for communities and outlines the need to identify and respond to the most vulnerable in planning for growth, for change or regeneration.

The proposed scheme responds to the deficit in purpose-built student accommodation and has a potential knock-on effect of easing some of the pressure on the private rented sector as some students may relocate from private rented accommodation to the proposed development which would offer students a more suitable and affordable option.

The proposal is consistent with Strategic Policy SIP1.

Strategic Policy SIP2 acknowledges planning policy as a tool in creating a quality of life.

The subject scheme providing 698 No. bedspaces provides a professional managed high-quality student accommodation scheme with excellent ancillary facilities for the future residents of the scheme, some of which will be available to the wider community.

It is therefore considered that the proposal will provide for high quality standard of residential amenity for the future occupiers. The subject scheme, which is currently not accessible to the general public, will also benefit the local community through the provision of facilities such as the linear nature trail/parkland area and active recreational space that will be publicly accessible.

The proposal is consistent with Strategic Policy SIP2.

Strategic Policy FP1 states that flood risk requires active management throughout the planning process.

A Site-Specific Flood Risk Assessment has been prepared by DBFL Consulting Engineers for the application site which concludes that there are no flood risk concerns at the subject site.

'Taking into consideration the management of surface water runoff from extant neighbouring permissions their discharge rates are all limited to greenfield runoff and they would not increase flood risk elsewhere. The developments surface water runoff will be limited to Qbar (greenfield runoff rate). Therefore, the development complies with the requirements of the GSDS and does not increase the risk of flooding elsewhere and does not result in displaced waters. It is concluded that the development meets the requirements of The FRA Guidelines and that the proposed development is appropriate to this flood zoning and a justification test is not required.'

The proposal is consistent with Strategic Policy FP1.

This section has clearly demonstrated that the proposed subject scheme comprising 698 No. student accommodation bedspaces and ancillary facilities is consistent with the relevant strategic policies set out the *Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022*.

5.2 **Regional Spatial and Economic Strategy for the Eastern and Midlands Region**

The *Regional Spatial and Economic Strategy* (or RSES) for the East and Midlands Regional Assembly was adopted on 28th June 2019. From this document a number of core Regional Policy Objectives have emerged to work in concert with the National Planning Framework (NPF), and to guide all Local Authority future plans, projects and activities requiring consent of the Regional Assembly.

Under **RPO 4.3** 'Consolidation and Re-intensification' the following objective is stated:

'Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs

and ensure that the development of future development areas is coordinated with the delivery of key water infrastructure and public transport projects.'

The subject scheme will provide 698 No. student accommodation bedspaces with ancillary resident support facilities therefore appropriately densifying this underutilised infill site.

The subject site is ideally located in just 850m from University College Dublin. The proposed development will result in the provision of much needed purpose-built student accommodation within close proximity to University College Dublin and therefore constitutes the appropriate intensification of an infill site in an appropriate urban location.

*The Metropolitan Area Spatial Plan (MASP) for Dublin contained within the RSES notes the following objective **RPO 5.5**:*

'Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.'

The subject site is contained within an established residential neighbourhood, adjacent to high-quality public transport and within walking distance of University College Dublin. Therefore, the proposed development represents consolidated growth on an infill/ brownfield site.

Under **Section 8.1** the RSES states the following with regard to integrating land use and transport planning:

'The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns.'

By providing a significantly reduced level of car parking, the proposed scheme seeks to encourage future residents to avail of the high-quality public transport and that the development is within walking distance to University College Dublin.

Therefore, the subject development contributes to consolidated growth, the reduction in carbon emissions.

Under **Section 8.2**, the RSES discusses responses to urban sprawl and justification for the move towards compact growth:

*'The Strategy aims to provide a spatial framework **to promote smart compact growth** as an alternative to continued peri-urban sprawl around our cities and towns, with a resultant*

negative impact on the environment and people's health and wellbeing due to increased commuting and loss of family and leisure time.'

The location of this development on a site well serviced by public transport and proximate to University College Dublin allows for reducing commuting time and greater work life balance for future residents.

Additionally, the provision of amenity spaces and communal facilities aides in the facilitation and promotion of healthy lifestyles and social interaction between residents.

6.0 LOCAL POLICY

This section will demonstrate that the proposed development has been designed in accordance with Local Policy and is consistent with the objectives and guidance as set out within the *Dún Laoghaire Rathdown County Development Plan 2016-2022*.

6.1 Zoning

The subject site is zoned *Objective 'A'* in the *Dún Laoghaire Rathdown County Development Plan 2016 – 2022* where the objective is 'to protect and-or improve residential amenity' (see Figure 6.1 below).

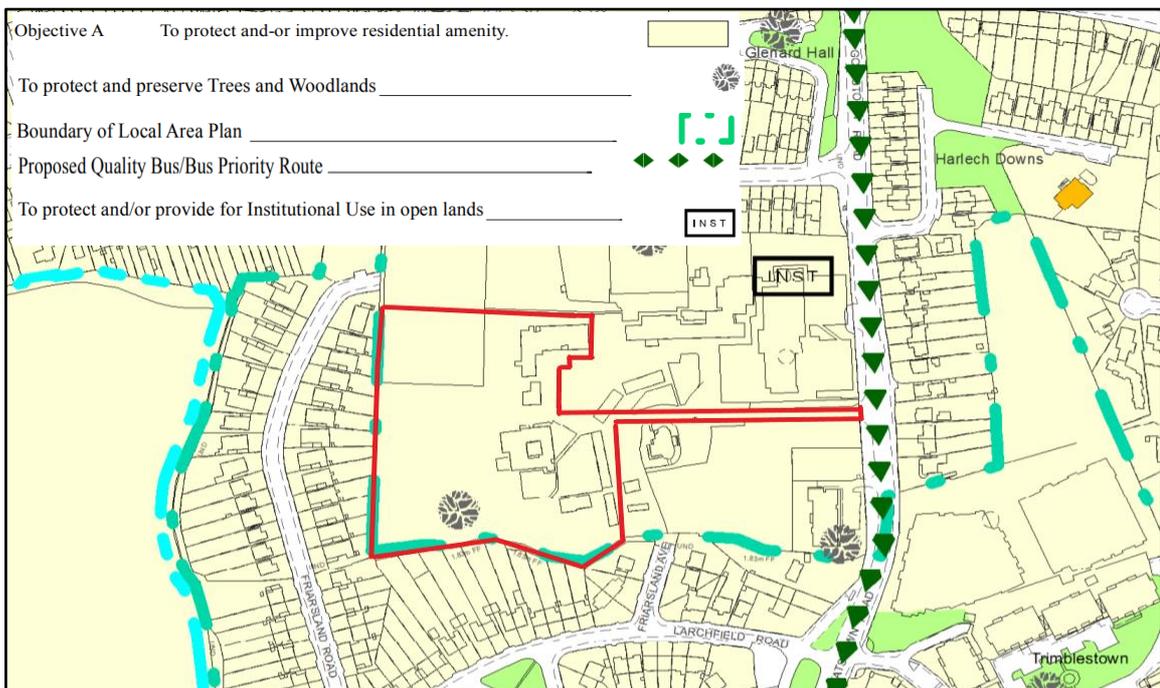


Figure 6.1: Zoning Map with the Subject Site Indicated.

Source: *Dún Laoghaire Rathdown County Development Plan 2016-2022*. Annotated by Thornton O'Connor Town Planning.

Land uses that are 'Permitted in Principle' and 'Open for Consideration' on lands zoned 'Objective A' include, but are not limited to:

Permitted in Principle

Assisted living accommodation; Open Space; Public Services; Residential; Residential Institution; and Traveller Accommodation.

Open for Consideration

Carpark; Community Facility; Childcare Service; Education; and Neighbourhood Sports Facility.

Student Accommodation is considered to be a residential land use, as such, the proposed development fully complies with the zoning objective of the site as 'Residential' development is permitted in principle on lands zoned Objective A.

As detailed in Section 7.3.1 of the Planning Report prepared by Thornton O'Connor Town Planning, the recently published *Draft Dun Laoghaire Rathdown Development Plan 2022-2028* proposes to rezone the subject lands as to Objective 'F', where the stated objective is *'to preserve and provide for open space with ancillary active recreational amenities'*. The 'INST' designation continues to apply to the subject site in the *Draft Plan*, however the objective *'to protect and preserve trees and woodlands'* has been removed. As extensively detailed in the Planning Report, the proposed rezoning to open space was not supported by the Executive and ensued following Councillor's motions. The Board should note that the proposed rezoning of the subject lands to open space will be vigorously challenged by the Applicant during the public consultation stage of the *Draft Plan*. We further note that this Planning Application will be assessed in the context of the current *Dun Laoghaire Rathdown Development Plan 2016-2022* as the *Dun Laoghaire Rathdown Development Plan 2022-2028* is not due to be adopted until 2022.

6.2 'INST' Objective

As can be seen in Figure 6.1 above, there is an 'INST' designation to the north east of the subject site which also applies to the subject lands. The Development Plan outlines this objective as follows:

'To protect and/or provide for Institutional Use in open lands.'

We note the following policy objective relating to open and Institutional Lands within the *Dún Laoghaire Rathdown Development Plan 2016-2022*. Under Section 8.2.3.4 xi) the following is stated as applying to Institutional Lands.

'Where no demand for an alternative institutional use is evident or foreseen, the Council may permit alternative uses subject to the area's zoning objectives and the open character of the lands being retained'

It is evident from the sale of the subject site by the Religious Congregation associated with Our Lady's Grove School, the lands were no longer required for 'institutional' use. For the purposes of clarity, Our Lady's Grove Primary School and Our Lady's Grove Secondary School, which are adjacent to the subject lands, have furnished letters (see Figures 6.2 and 6.3 below) confirming that the subject lands are not required for expansion of educational facilities and any expansion required will take place on lands within their own demise.



Figure 6.2: Letter from Our Lady's Grove Primary School Confirming Any Future Expansion of the School will be Accommodated within their Lands

Source: As provided by Our Lady's Grove Primary School



Our Lady's Grove Secondary School

Our Lady's Grove, Goatstown Road, Dublin 14

To Whom it may concern,

The Our Lady's Grove Secondary School Campus at Our Lady's Grove, Goatstown Road, Dublin 14 is currently undergoing a regeneration programme which includes the almost completed realignment of the Hockey pitch and the building of new changing facilities.

Having had discussions with Colbeam Ltd, regarding the student accommodation proposal for the neighbouring site, we can confirm that their proposals have our support. In our opinion Colbeam are committed to providing a quality development and ongoing appropriate custodianship of the completed project.

We can confirm that any expansion of the current school and facilities will take place on lands within our control at Our Lady's Grove, Goatstown, Dublin 14. We believe that the grounds currently under leasehold from Le Cheile Trust provide us with ample opportunity to expand should our numbers rise. The Lands sold by the RJM Sisters, other than a small portion of the original hockey pitch, have never been in the control of the secondary school. They were owned and managed by the RJM Sisters and as such were not part of our Board of Management's long-term plans.

Due to the current congested experience that is the reality of the Goatstown Road campus entrance, we welcome the low number of parking spaces provided for in this plan. We confidently expect Colbeam Ltd to align with the parking management system in force on the campus.

Finally, we welcome the large amount of useable community open space that will be provided on site. These spaces have the potential to be useable by the educational institutions on the campus and the local residents.

Yours sincerely,

Colm Dooley


Principal
 Our Lady's Grove

Principal: Colm Dooley Deputy Principal: Sonya Lyons
Phone: 2951913 ♦ Fax: 2963597 ♦ Email: office@olgrove.ie

Figure 6.3: Letter from Our Lady's Grove Secondary School Confirming Any Future Expansion of the School will be Accommodated within their Lands

Source: As provided by Our Lady's Grove Secondary School

The Map provided in Figure 6.3 below shows the area that of lands available to the two schools for lateral extension. However, the schools also have the option to extend vertically (in accordance with an appropriate planning permission) if large scale extension should become necessary. For the purposes of clarity, part of the area shown as 'site for future expansion' on the Secondary School campus is the location of the recently permitted changing facilities (as per DLRC Reg. Ref. D20A/0192 and D20A/0198).

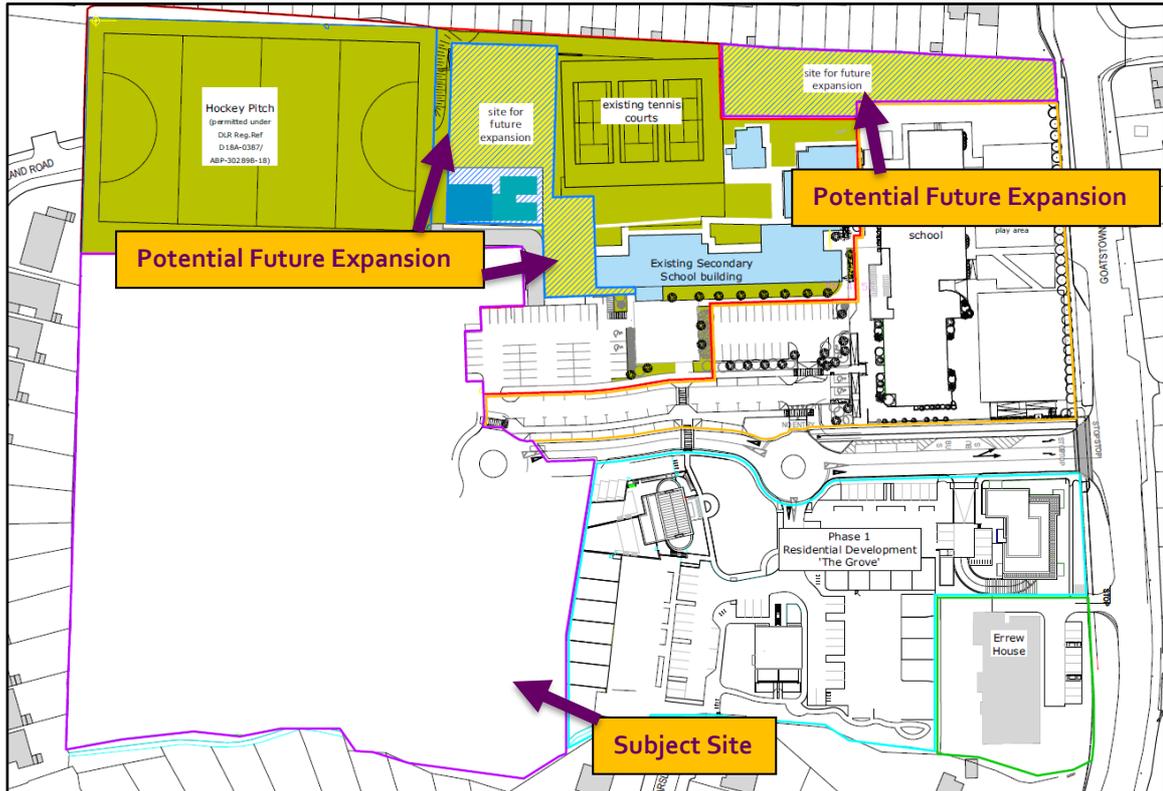


Figure 6.4: Map Showing Potential Area for Lateral Future Expansion of Our Lady's Grove School (if required)

Source: Stephen Marshall Urbanism Limited

It should further be noted that the Department of Education is intending to provide a new Educate Together campus comprising primary and secondary level schools on proximate lands at the former Irish Glass Bottle site on the Goatstown Road. Under DLRCC Reg. Ref. D20A/0268, the Department of Education and Skills has applied for permission to develop a temporary post primary school by way of construction of 4 No. pre-fabricated buildings and ancillary vehicular entrance and hard surface paly area on a site approximately 550m to the south of the subject site of this Planning Application.

On 16th July 2020, Dún Laoghaire Rathdown County Council issued a *Request for Further Information* in relation to the proposed development, which can be summarised as follows:

- Clarification of adjacent lands within the ownership of the Applicant and increase the redline boundary to comply with the Department of Education's Technical Guidance Note 027 (September 2019) which requires a larger site area for schools of this size.
- Detail the permeability links for pedestrians and cyclists from the Mount Carmel Road and the Farmhill Road.
- Submit a detailed design of the proposed cycle parking.
- Submit revised drawings demonstrating the inclusion of shower, lockers and changing facilities for staff and students.

- Submit a Quality and Road Safety Audit demonstrating compliance with the Design Manual for Urban Roads and Streets (DMURS).
- Submit a detailed Mobility Management Plan.
- Submit detailed plan and elevation drawings demonstrating any changes to the existing vehicular entrance.
- Liaise with the DLRCC Traffic Section to ascertain the requirement for a toucan crossing in the vicinity of the site entrance along the Goatstown Road.
- Submit a detailed Construction Management Plan.

A Response to the *Request for Further Information* was submitted on 25th January 2021 and a Decision is due by 12th February 2021.

Whilst the works proposed under DLRCC Reg. Ref. D2oA/o268 are a temporary measure, future permanent construction is envisaged for two schools at the site. According to the Irish Times, it is intended that the lands will host a 16-classroom Educate Together² primary school and an 800-pupil secondary school³.



Figure 6.4: Map Showing the Location of DLRCC Reg. Ref. D2oA/o268 in relation to the Subject Site

Source: Myplan.ie (Annotated by Thornton O'Connor Town Planning, 2020)

Section 8.2.3.4 xi) of the Development Plan further states:

² <https://www.irishtimes.com/news/education/department-in-talks-to-buy-multi-million-euro-goatstown-site-for-schools-1.3858860>

'In order to promote a high standard of development a comprehensive masterplan should accompany a planning application for institutional sites. Such a masterplan must adequately take account of the built heritage and natural assets of a site and established recreational use patterns. Public access to all or some of the lands may be required. Every planning application lodged on institutional lands shall clearly demonstrate how they conform with the agreed masterplan for the overall site.'

A Masterplan for the site is provided in Section 4.0 of the separately enclosed Design and Access Statement. The Masterplan includes reference to matters including the framing of views, the creation of a central focus, height and visual impact, massing relative to adjacent schemes etc.

We submit that the subject scheme of this Planning Application provides Student Accommodation, a residential use that is institutional in character and thus is eminently suitable on lands with an 'institutional' designation.

We note the following policy objective relating to open and Institutional Lands within the *Dún Laoghaire Rathdown Development Plan 2016-2022* which states that:

'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 whichever is the greater) will be required on Institutional Lands.'

The Development Plan explains the Council's policy in relation to Public Open Space on lands with an Institutional designation as follows:

'It is Council Policy to retain the open space context of Institutional Lands which incorporate significant established recreational or amenity uses, as far as is practicable. In the event of permission for development being granted on these lands, open space provision in excess of the normal standards will be required to maintain the open character of such parts of the land as are considered necessary by the Council. For this purpose a minimum open space provision of 25% of the total site area - or a population-based provision in accordance with the above occupancy criteria – will be required, whichever is the greater. There may also be a requirement to provide open space in excess of the 25% if an established school use is to be retained on site in order to facilitate the future needs of the school (refer also to Section 8.2.3.4(xi)).'

The policy as set out above refers to retaining 'established recreational or amenity uses' on Institutional lands. It is important to note that the subject lands are not in recreational or amenity use and are not accessible to the general public. Thus, the lands do not comprise 'established' recreational or amenity uses. However, the proposed development includes the provision of 7,956 sq m of public open space which is located at ground floor level of the subject scheme as depicted in yellow in Figure 6.5 below. This space will allow the subject lands to provide a recreational opportunity for the local community.

The proposed 7,956 sq m public open space is presented in the form of an active recreational area situated in the north east of the subject site in addition to a linear parkland/nature trail that runs along the perimeter of the subject site. The public open space provision equates to 37.5% of the subject site (yellow area only). The Board should note that in its present state there is no public open space provided on the subject site. Therefore, the provision of 7,956 sq m of high-quality public open space represents a significant planning gain for the local community.

It is important to understand the true scale of the public open space proposed. Due to the scale of the site, over two hectares in size, the extent of the open spaces is not readily understood by Plan. The perimeter trail has a length of 443 metres (by comparison a standard running track is 400m) and thus is a very useable track for a daily jog with exercise enthusiasts also benefitting from the outdoor gym equipment interspersed along its length. When compared with other public amenity spaces, the quality and functionality of the proposed linear nature trail is proven to be favourable. For example, the East pier in Dún Laoghaire harbour is approximately 19m in width compared to the proposed nature trail which extends to 30m in width along the western boundary.

In addition to the public open space provided within the proposed development, there is also a total of 2,852 sq m of external communal amenity space available to the future student residents of the scheme. This external communal/student amenity space is split into a 902 sq m courtyard at lower ground floor level between the North and Middle block and a 1,950 sq m plaza between the South block and Mews blocks at ground floor level. The external communal/student amenity space has been subject to a high quality landscape design to allow it to be highly functional. Within the subject site there is also an open space area of 280 sq m which will remain within the boundary of the Afterschool facility.

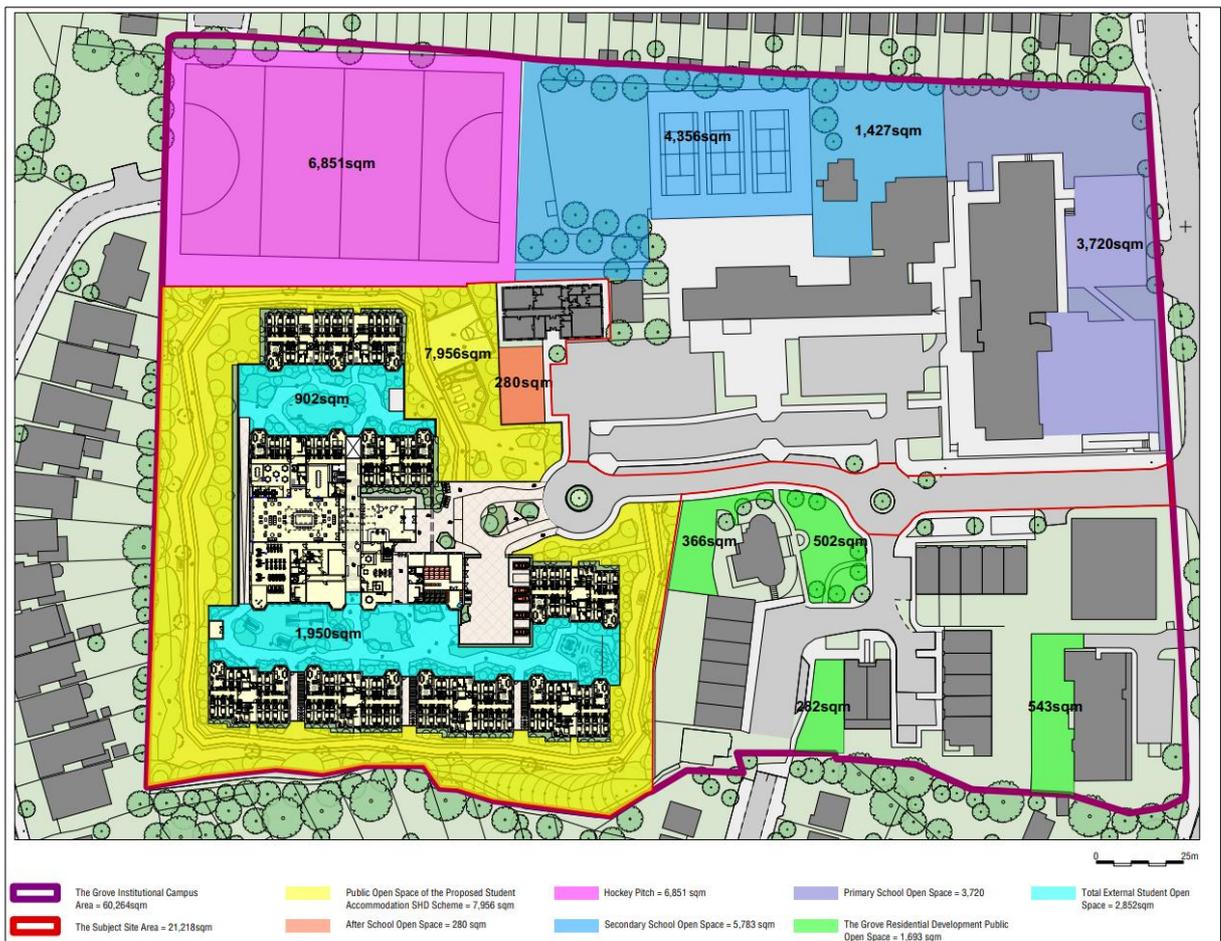


Figure 6.5: Image Showing the Proposed Open Space Provision of the Subject Scheme (within the Redline) and the Open Space within the Wider Institutional Landholding

Source: Stephen Marshall Urbanism Limited

The total open space provision within the subject site therefore equates to 11,088 sq m or 52% of the subject site (7,956 sq m public open space + 2,852 sq m external student open space + 280 sq m Afterschool open space).

In the wider context of the entire lands designated 'institutional', which measure approximately 60,264 sq m, if the subject scheme is granted permission there will be a total of 29,135 sq m open space across the institutional landholding, which equates to 48% of the overall lands at The Grove subject to the 'INST' designation (60,264 sq m).

It is noted that the Development Plan above also refers to occupancy criteria (Section 8.2.8.2) in the assessment of open space. In our opinion the occupancy criteria are not applicable to a student development which has a higher occupancy than a standard residential development in equivalent floor space. Section 8.2.8.2 of the *Dun Laoghaire-Rathdown Development Plan 2016-2022* states the following with regard to a population based equivalent open space standard:

'For all developments with a residential component – 5+ units - the requirement of 15 sq m-20 sq m. of Open Space per person shall apply based on the number of residential/housing units. For calculation purposes, open space requirements shall be based on a presumed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.'

In our opinion, the above policy is clearly designed for housing units, with presumed occupancy rates also provided in the policy for standard housing units. The policy does not refer to student housing use and does not provide any calculation methodology for student housing. Thus, in our opinion this policy does not apply to the proposed student scheme. However, we have included this matter in the separately enclosed Material Contravention Statement out of an abundance of caution in the event that the Board may consider that it does in fact apply. Applying the total number of bedspaces (698 No.) by the 15-20 sq m standard would result in an open space standard of 10,470 sq m – 13,960 sq m. Thus, the minimum amount of open space required would be more than a hectare in area. As detailed in Figure 6.5, the subject site provides a total of 11,088 sq m open space. The 280 sq m will not be accessible to the students and thus the open space amenity available to the students will be 10,808 sq m, an equivalent of 15.48 sq m per bedspace. The scheme thus achieves the lower end of the range of 15 sq m per bedspace but does not achieve the higher end of 20 sq m per bedspace. We strongly submit that requiring such a substantive tract of residentially zoned urban land to be dedicated to public open space would not be in the interests of sustainable planning and maximising efficiencies of scarce urban land.

6.3 Density

Density

The *Dun Laoghaire-Rathdown Development Plan 2016-2022* indicates that there is an 'INST' designation pertaining to the lands at Our Lady's Grove, which includes the subject site. The Development Plan outlines this objective as follows:

'To protect and/or provide for Institutional Use in open lands.'

Policy RES 5 and Section 2.1.3.5 of the Development Plan outlines Dún Laoghaire Rathdown County Council's approach to housing density on 'institutional' designated lands as follows:

*'In the development of such lands, average net densities should be in the region of 35 - 50 units p/ha. **In certain instances, higher densities will be allowed where it is demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands.**' [Our Emphasis]*

The density parameter set out above relates to residential units per hectare and there is no equivalent standard provided in the *Dun Laoghaire-Rathdown Development Plan 2016-2022* for student use. We note that the policy refers to 'net density'. The *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, May 2009* state:

*'A net density is the most commonly used approach in **allocating housing land within Local Area Plans and is appropriate for development on infill sites where the boundaries of the site are clearly defined and where only residential uses are proposed.**' [Our Emphasis]*

As per the above, the National Guidelines are clear that net density is a standard developed for the assessment of residential uses. Whilst student accommodation is a type of residential development, it has its own use class and cannot be assessed in terms of units per hectare due to the wide range of unit types that can be provided from small studios to medium size clusters or larger clusters resulting in a quantitative standard that is not comparable to apartment/housing residential developments. It is thus not possible to accurately determine the density of a student scheme in an equivalent method to providing the density of a residential housing/apartment development.

We note that Dún Laoghaire Rathdown County Council in their Report of the Chief Executive on the pre-application stage of this application referred to the density of the scheme on a per cluster basis and noted that the scheme submitted at pre-application stage comprised a density of c. 61 No. clusters per hectare based on 112 No. clusters + 17 No. studios/2.12. Using that calculation methodology, the now amended and reduced scheme comprises a density of 55.6 No. clusters per hectare (99 No. clusters + 19 No. studios)/2.12). It is our professional planning opinion that the subject site is ideally suited to the provision of a student development given its institutional origins and the institutional nature of the adjacent campus.

It should be noted that the height of the scheme facilitates density whilst protecting the open space nature of the lands at ground level and thus in our opinion the verticality of structures proposed contributes towards the objective of retaining the open character and/or recreational amenities of the lands in accordance with the above policy applying to lands subject to the 'INST' Objective which expressly states *'In certain instances, higher densities will be allowed where it is demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands.'*

The *Dun Laoghaire-Rathdown Development Plan 2016-2022* does not provide an average density for uses other than standard housing/apartment residential on lands subject to the 'INST' objective and thus in our opinion the scheme proposed does not materially contravene the Plan on this matter. However, we consider it prudent to include density in the Material Contravention Statement enclosed with this Planning Application in the event that An Bord Pleanála considers that the residential density standards provided in accordance with the 'INST' objective should also apply to student use.

The Statement sets out that it is our professional planning opinion that the proposed density of the subject scheme represents the appropriate densification of a site that is ideally suited to the development of Student Accommodation, owing to the proximity to University College Dublin. The subject scheme therefore adheres to the principles of proper planning and sustainable development and is fully in accordance with National Policy which seeks to increase density in appropriate urban areas.

6.4 Building Height

The development proposes a part 3 to part 6 No. storey over part lower ground floor level student accommodation scheme in 8 No. blocks. The maximum overall height of the proposed development is 18.03m from ground level (an equivalent of 6 No. storeys from ground level). It should be noted that the maximum height of the subject scheme when read from the north courtyard is 7 No. storeys, however the north courtyard is positioned at lower ground floor level and thus the scheme will be legible as 6 No. storeys from surrounding locations external to the site.

The scale, massing and siting of the blocks have been carefully considered to ensure that it can be assimilated into its receiving context. Appendix 9 of the *Dun Laoghaire-Rathdown Development Plan 2016-2022* sets out the Policy for Residual Suburban Areas not included within Cumulative Areas of Control and states that '*A general recommended height of two storeys will apply.*' The policy further states that apartment or town-house type developments or commercial developments in the established commercial core of these areas to a maximum of 3-4 storeys may be permitted in appropriate locations - for example on prominent corner sites, on large redevelopment sites or adjacent to key public transport nodes - providing they have no detrimental effect on existing character and residential amenity. The Plan further states that:

'This maximum height (3-4 storeys) for certain developments clearly cannot apply in every circumstance. There will be situations where a minor modification up or down in height could be considered.'

It is considered that the subject lands are suitable for 'upward modifiers' having regard to the planning gain that will be provided in contributing to the public realm and the size of the site which is greater than 0.5 hectares can set its own context for development with greater building heights set away from the boundaries.

As the proposed development is 6 No. storeys in height as viewed from surrounding properties with an internal lower courtyard providing a view of 7 No. storeys it is considered that the development exceeds the heights indicated in Appendix 9 of the *Dun Laoghaire-Rathdown Development Plan 2016-2022*.

We note that the *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)* take precedence over the Development Plan.

The subject scheme of this Planning Application has sought to provide increased height at the subject site. The proposal includes maximum heights of 6 No. storeys over lower ground level, which when read from the sunken north courtyard is 7 No. storeys. However, for clarity the north courtyard is positioned at lower ground floor level and thus the scheme will be legible as 6 No. storeys from surrounding locations external to the site. It should be noted that the adoption of a 2.7 metre floor to floor height in the proposed student accommodation scheme, as opposed to the 3.1 metre floor to floor height which was used at the previous application for residential use at the subject lands (which was granted permission by An Bord Pleanála before being quashed by the High Court following Judicial Review proceedings), ensures that the previously proposed 5 No. storey residential scheme equates to 6 No. storeys of student accommodation. In the case of the North, Middle and Southern blocks, which range in height from part 5 No. storeys to part 6 No. storeys, the top floor level has been setback to reduce the visual impact of the additional verticality.

A Material Contravention Statement relating to the height of the scheme is enclosed with this Planning Application. The Statement sets out that An Bord Pleanála and Planning Authorities must have regard to the Specific Planning Policy Requirements (SPPRs) set out in the *Urban Development and Building Heights Guidelines for Planning Authorities 2018*. SPPR 1 of the Guidelines notes that blanket numerical limitations on building height shall not be provided for through statutory plans.

The Statement sets out that it is our professional planning opinion that the increased height and associated density proposed as part of the subject scheme represents the principles of proper planning and sustainable development and is fully in accordance with National Policy which seeks to increase height and density in appropriate urban areas.

6.5 Car Parking

Tables 8.2.3 and 8.2.4 of the Development Plan outlines the car parking standards for the Dún Laoghaire Rathdown County Council administrative area. There is no standard for student accommodation included within the Development Plan.

Due to the proximity of the subject site to University College Dublin and the accessibility to public transport, a decision has been taken by the design team to include a reduced car parking provision within the subject scheme. This design decision allows the retention of a significant number of trees within the site and protects the open space and character of the lands in accordance with the 'INST' designation.

There are 9 No. car parking spaces included within the design of the subject scheme, which include 2 No. accessible spaces and 1 No. car sharing space. As Table 8.2.3 and Table 8.2.4 of the Development Plan do not outline a car parking standard for Student Accommodation, the proposed car parking provision within the subject scheme is based upon a review of recently permitted student accommodation schemes in Dublin. The review, which was undertaken by DBFL Consulting Engineers (as provided in Section 3.4 of the Transportation Statement prepared

by DBFL Consulting Engineers), found that the majority of the recently permitted student accommodation schemes do not include car parking provision, with a small number including a nominal element of car parking. On the basis of this review, a decision was taken to include a nominal element of car parking provision within the subject scheme.

Table 8.2.3 of the *Dun Laoghaire Rathdown County Development Plan 2016-2022* outlines the car parking standards for the Dún Laoghaire Rathdown County Council administrative area. There is no standard for student accommodation included within the Development Plan.

Due to the proximity of the subject site to University College Dublin and the accessibility to public transport, a decision has been taken by the design team to include a reduced car parking provision within the subject scheme.

The rationale for reduced provision of car parking is also based upon a review, by DBFL Consulting Engineers, found that the majority of the recently permitted student accommodation schemes do not include car parking provision.

The subject scheme includes the provision of 9 No. car parking spaces. Some 4 No. motorcycle spaces are also provided.

6.6 Bicycle Parking

Section 8.2.4.7 Cycle Parking of the Development Plan that states '*for development, short and long term cycle parking and cycle facilities provision shall be in accordance with the requirements in the Council Cycling Policy Guidelines and Standards*'.

The *Standards for Cycle Parking and Associated Cycle Facilities for New Developments*, January 2018 sets out cycle parking standards for residential development. Based upon the standards outlined in Table 4.1 of the Standards for Cycle Parking (as shown below), the proposed 698 No. bedspaces results in a requirement for 489 No. cycle parking spaces (140 No. short stay spaces and 349 No. long stay cycle spaces).

Table 4.1 Cycle parking for residential development		
Residential Development type	1 short stay (visitor) parking space per: (Minimum of 2 spaces)	1 long stay parking space per: (Minimum of 2 spaces)
Apartments, Flats, Sheltered housing	5 units	1 unit
Houses - 2 bed dwelling	5 units	1 unit
Houses - 3+ bed dwelling	5 units	1 unit
Sheltered housing	5 units	1 unit
Student Accommodation	5 bedrooms	2 bedrooms

In total there are 860 No. cycle parking spaces provided in 4 No. locations within the subject scheme. As such, the quantum of cycle parking spaces comfortably exceeds the Dún Laoghaire-Rathdown Cycling Policy requirement.

The rationale for the provision of bicycle parking in excess of the minimum standards outlined in the Development Plan is based on the subject site's proximity to University College Dublin and a fair assumption that a large number of future residents of the subject scheme will chose to cycle to and from college.

6.7 Objective to Protect and Preserve Trees

There is an Objective to Protect and Preserve Trees on part of the subject lands. The Development Plan states in *Section 8.2.8.6: Trees and Hedgerows* that:

*'New developments shall be designed to incorporate, **as far as practicable**, the amenities offered by existing trees and hedgerow and new developments shall have regard to objectives to protect and preserve trees and woodlands as identified on the County Development Plan Maps.'* [Our Emphasis].

Policy OSR7: Trees and Woodland further states that:

'It is Council policy to implement the objectives and policies of the Tree Strategy for the County – 'dlr TREES 2011-2015' - to ensure that the tree cover in the County is managed and developed to optimise the environmental, climatic and educational benefits which derive from an 'urban forest'.'

The mentioned *Tree Survey 2011-2015* states that:

'Certain trees, groups of trees and woodlands have been identified on the Development Plan Maps. It is intended that these trees be protected and maintained. Robust and appropriate levels of protection should be provided for trees and tree groups identified, with a long-term aim of linking groups together to provide more robust tree assemblages.'

The Tree Strategy promotes the preservation and retention of designated trees onsite. However, the strategy also promotes new planting in the right places to replace trees that are aging and/or unhealthy or are being lost as a consequence of development pressures.

An Arboricultural Report and drawing prepared by The Tree File Limited is enclosed with this Planning Application. The proposed development will not negatively impact the tree objective relating to the subject site, indeed as demonstrated in the enclosed Arboricultural Report the proposed development will enhance the arboreal footprint of the subject site.

'The proposed development of the site will result in a net gain of 22 No. trees, increasing the total number of sustainable trees of the site from the current 48 No. sustainable trees, to 78 No. trees and circa 100meters of tree line in two groups.'

As demonstrated in the findings of the Arboricultural Report, the proposed development will result in a significant net gain to the number of sustainable trees on the subject site.

6.8 Other Relevant Development Plan Policy

Policy RES12 of the *Dún Laoghaire Rathdown County Development Plan 2016-2022* states that it is Council Policy to:

'Facilitate student accommodation on student campuses or in locations which have convenient access to Third Level colleges (particularly by foot, by bicycle and high quality and convenience public transport) in a manner compatible with surrounding residential amenities. In considering planning applications for student accommodation the Council will have regard to the "Guidelines on Residential Developments for Third Level Students" and its July 2005 review (particularly in relation to location and design).'

The subject site is ideally suited for the provision of Student Accommodation, particularly given the proximity of University College Dublin which is approximately 850m from the subject site and is therefore readily accessible by foot and by bicycle. The scheme has been designed to ensure compatibility with the surrounding residential amenities.

Section 8.2 of the *Dún Laoghaire Rathdown County Development Plan 2016-2022* outlines the Council's criteria that will be considered for the location of Student Accommodation as follows:

'The location of student accommodation within the following hierarchy of priority:

- *On campus;*
- *Within 1 km 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 routers and green routes.*

In all cases such facilities will be resisted in remote locations at a remove from urban areas.'

As previously outlined, the subject site is located 850m from University College Dublin and is therefore ideally suited for the provision of Student Accommodation.

There are further criteria for the consideration of proposed Student Accommodation laid out in Section 8.2 of the Development Plan as follows:

- *'The potential impact on residential amenities. Full cognisance will be taken of the need to protect existing residential amenities particularly in applications of larger scale student accommodation, and such accommodation will not be permitted where it would have a detrimental effect.'*

In designing the subject scheme, cognisance was given to the scheme previously permitted by An Bord Pleanála at the subject site but subsequently quashed by the High Court. As previously outlined in Section 3.0 of this Report, the orientation and siting of the proposed blocks was changed from the previous scheme with the blocks turned 90° in an effort to reduce the potential for impact to dwellings to the West.

A Student Management Plan prepared by Colbeam Limited and enclosed with this Planning Application outlines how the subject scheme will be appropriately managed to ensure the protection of the residential amenity of surrounding properties.

- *'The level and quality of on-site facilities, including storage facilities, waste management, covered cycle parking and associated showers and locker, leisure facilities, car parking and amenity.'*

An Operational Waste Management Plan prepared by Awn Consulting Limited is enclosed with this Planning Application. The Plan outlines the Waste Management Strategy for the proposed development, in line with best practice guidelines.

The storage facilities, cycle parking and amenity areas have all been provided in adherence with the relevant National and Local Policy.

- *The architectural quality of the design and also the external layout, with respect to materials, scale, height and relationship to adjacent structures. Internal layouts should take cognisance of the need for flexibility for future possible changes of use.*

The enclosed Design and Assess Statement prepared by Stephen Marshall Urbanism outlines the materials strategy that will be utilised in the subject scheme. The Report states that:

'This combination of high-quality brickwork and high quality re-constituted stone marking the principal elements, will produce a distinctive character which will fit in well with the existing material context.'

It is proposed to use white reconstituted stone on the bay windows to the communal living/kitchen/dining areas. Pale brown brick will be utilised in a double stacked bond, which reduces the scale of the walls. Light grey stone is proposed for the top floor, which is set back from the shoulder level, with the massing further broken down through the utilisation of zinc coloured reconstituted stone.

As outlined in Section 3.0 and 4.0 of this Report, the subject scheme has been designed having regard to the surrounding context of the subject site.

7.0 CONCLUSION

This Statement of Consistency document has comprehensively overviewed all relevant national, regional and local planning policy documents which are considered to be of relevance to the proposed development at the subject site.

The proposed development represents a significant investment in a strategically located site which is eminently suitable for student accommodation given its proximity to University College Dublin.

We submit that the proposed development is in accordance with all relevant policy documents discussed throughout this report and the supporting consultant reports. Therefore, the proposed development represents the proper planning and sustainable development of the area.

