



An
Bord
Pleanála

Inspector's Report

ABP-304320-19

Development	Permission for all-weather playing facility.
Location	Site of c.0.8ha located at Saint Tiernan's Community School (Roll No. 91343T), Parkvale, Balally, Dublin 16. The school site adjoins the Gort Mhuire Centre (A Protected Structure) to the south (RPS Ref. 1453)
Planning Authority	Dun Laoghaire Rathdown County Council
Planning Authority Reg. Ref.	D18A/0979
Applicant(s)	Minister for Education and Skills
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	Parkvale and Ballyolaf Residents Association
Observer(s)	Inland Fisheries Ireland

R.A. Daughton

Lt-Col Sean McCarrick

Kevin Deane

Date of Site Inspection

17/07/2019

Inspector

Gillian Kane

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1.0 Site Location and Description

- 1.1.1. The subject site is part of the grounds of St. Tiernan's Community School, in Balally, south Co. Dublin. It lies c.320m to the south of Dundrum town centre and 1.2km north-east of Ballinteer. The school is accessed off the Sandyford Road (R117) and through the Parkvale housing estate.
- 1.1.2. The subject site refers to a rectangular section of green field, to the north of the existing School. Car parking for staff and visitors is provided to the east of the school building and adjacent to the eastern site boundary.
- 1.1.3. The eastern boundary of the site adjoins the rear of properties in Dun Emer Drive. The boundary is defined by wall and is planted with trees and hedging. The River Slang forms the northern boundary of the site. There is a ramped pedestrian access to the River Slang Greenway from Wyckham Way to the west of the site. An informal path runs from the eastern boundary of the site to the greenway, joining at a bridge over the Slang River and Greenway that carries the roadway, cycleway and footpaths. This path also provides pedestrian access to Ardglas Housing Estate.

2.0 Proposed Development

- 2.1. On the 16th October 2018, planning permission was sought for the development of an all-weather training pitch (approx. 94m x 5m), to the north of the existing community school. The development will include the provision of perimeter railing and fencing, dug-outs, ball-stop netting, internal footpaths, surface water drainage provisions, and changes in ground level.
- 2.2. The application was accompanied by the following:
 - Planning Report
 - Engineering Assessment Report
 - Cultural Heritage Assessment Report
 - AA Screening Report
 - Invasive Species Report
 - Arboricultural Assessment and Arboricultural Impact Report

3.0 **Planning Authority Decision**

3.1. **Planning Authority Reports**

- 3.1.1. **Drainage Planning:** Further information required regarding proposals for dealing with run-off.
- 3.1.2. **Transportation Department:** Further information required regarding impact on Slang River walkway.
- 3.1.3. **Planning Report:** Proposed development acceptable in principle. Scale of use outside school hours is limited therefore no significant traffic impacts. Condition that school parking be made available should be attached. Some of the trees to be removed are part of the Slang Greenway. Applicant should be requested to move pitch southwards allowing trees to be retained. Planning Authority has concerns regarding proximity of the proposed pitch to the boundary with Dun Emer Drive. Pitch should be relocated away from this boundary. Floodlights would require a separate planning application. Proposed pitch is within 10m of recorded Japanese knotweed. Further information regarding a programme for its eradication is required.

3.2. **Prescribed Bodies**

- 3.2.1. None on file.

3.3. **Third Party Observations**

- 3.3.1. A large number of objections to the proposed development were submitted to the Planning Authority. The issues raised largely relate to traffic and access from within the Parkvale residential area.

3.4. **Further Information**

- 3.4.1. On the 6th of December 2018 the applicant was requested to address six items of further information.
- 3.4.2. On the 8th of March 2019 the applicant responded to the request with the following:
- Invasive Alien Species Survey and Management Plan
 - Tree Mitigation Plan
 - Revised Site Layout Plan
 - Engineering response to FI request
 - Existing Walkway Layout.

The cover letter submitted with the FI response states that the engineering assessment report shows that there is sufficient capacity to store excess stormwater from the site, that the proposed headwall will not impact the existing walkway. Regarding the request to move the proposed pitch away from the Greenway and Dun Emer drive, the letter states that mitigation tree planting will be undertaken outside the fenced northern boundary and the footpath on the eastern boundary will be relocated westwards within the site.

3.4.3. **Transportation Department:** No objection subject to conditions.

3.4.4. **Planning Report:** Response to items 1,2, 3 and 4 acceptable. Proposed replacement trees along the northern boundary acceptable (item 5). Realigning of path along Dun Emer Drive boundary welcomed. Proposed development is acceptable.

3.5. **Decision**

3.5.1. On the 2nd April 2019 the Planning Authority issued a notification of their intention to grant permission subject to 10 no. conditions. Condition no. 2 refers to the use of the pitch outside school hours. Condition no.s 3 and 4 refer to construction hours and traffic. Condition no.s 6 and 7 refer to drainage. Conditions no. 8 requires the tie-in of the perimeter walkway to the ground level along the line of the Greenway. Condition no. 9 refers to the Japanese Knotweed eradication plan and condition no. 10 requires the use of school access and parking to be made available outside of school hours.

4.0 **Planning History**

4.1.1. **ABP-303041-18 (D18A/0865):** Planning permission granted for a two-storey primary school, two-storey sports facility, car parking and playing pitches to the west of the subject playing pitch. The Board decision omitted the proposed temporary vehicular entrance onto Wyckham Way. Condition no. 2 states:

2. The proposed development shall be amended as follows:-

- (a) The proposed left turning exit only vehicular access onto Wyckham Way, and associated internal vehicular roadway leading to this access, shall be omitted from the development.
- (b) Cyclist access and pedestrian access to the existing footpath and cycle way along Wyckham Way shall be facilitated.

- (c) The internal access roads and turning areas within the overall school lands, and the existing gateway onto the Parkvale estate, shall be altered to provide for two-way vehicular traffic through the existing access from/into the Parkvale estate, and the proposed turning areas/drop-off bays within the site shall be so sized as to permit full-size coaches to enter and leave the school lands without having to reverse.

Revised drawings showing compliance with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interests of pedestrian and traffic safety.

- 4.1.2. **PL06D.244602** (PA Reg. Ref. D14A/08360): Permission granted for retention of an extension to the access road, new drop-off area and 3 car parking spaces.
- 4.1.3. **PL06D.243128** (PA Reg. Ref. D13A/0670): Outline permission refused for the development of (a) a new two-storey primary school consisting of 16 classrooms with new access road off Wyckham Way, set down areas, ball courts, hard play areas and site boundary treatments and (b) a new sports hall including ancillary accommodation on-site car parking.
- 4.1.4. **PL06D.241729** (PA Reg. Ref. D12A/0488): Outline permission was sought for (a) new two-storey primary school consisting of 16 classrooms, new access road off Wyckham Way, set down areas, ball courts, hard play areas and site boundary treatments and (b) new sports hall including ancillary accommodation on-site car parking. The application was withdrawn.
- 4.1.5. **PA Reg. Ref. D11A/0517** – Permission was granted for the erection of a school sign on the frontage to Wyckham Bypass, together with associated site works.
- 4.1.6. **PL06D.RL.3073**: The Board decided on 13th June 2013 that the change of use from a secondary school to a primary and secondary school at St. Tiernan's Community School is not development.

5.0 Policy Context

5.1. Dun Laoghaire Rathdown Development Plan 2016 -2022

- 5.1.1. The site is zoned 'A' with the objective to protect and/or improve residential amenity. Under this zoning objective 'sports facility' use is open for consideration.
- 5.1.2. **Section 8.2.12.3** of the development plan refers to community facilities. It states that in assessing planning applications for leisure facilities, sports grounds, playing fields, play areas, community halls, organisational meeting facilities, medical facilities, childcare facilities, new school provision and other community orientated developments, regard will be had to the following:
- Overall need in terms of necessity, deficiency, and opportunity to enhance or develop local or County facilities.
 - Practicalities of site in terms of site location relating to uses, impact on local amenities, desirability, and accessibility.
 - Conformity with the requirements of appropriate legislative guidelines.
 - Conformity with land use zoning objectives.
- 5.1.3. **Section 8.2.12.4** of the plan, referring to school development states that the dual function of sports facilities/halls etc outside of school hours will be encouraged where the use of such facilities will be of a benefit to the wider community, however any outside hours usage of the school should not be to the detriment of adjoining residential amenities. Full details of all anticipated uses outside of school hours should be provided with the planning application.
- 5.1.4. There are two protected structures in the immediate area: **RPS No: 1446** – Gort Mhuire Lodge Ballinteer Road, Ballinteer, Dublin 16. Gate Lodge **RPS No: 1453** – Gort Mhuire Centre Ballinteer Road, Ballinteer, Dublin 16. Water Gardens, Garden Walls and Farm Building Complex, House, Ornamental Ironwork, Conservatory and Water Tower 1453.

5.2. Natural Heritage Designations

- 5.2.1. The nearest Natura 2000 sites are;
- The South Dublin Bay Special Area of Conservation (Site Code: 000210) is circa 4.2km to the north-east of the appeal site.
 - South Dublin Bay and River Tolka Estuary Special Protection Area (Site Code: 004024), approximately is 4.2km to the north-east of the appeal site.

- Rockabill to Dalkey Island Special Area of Conservation (Site Code: 003000), is circa 9.9km to the east of the appeal site.
- Dalkey Island Special Protection Area (Site Code: 004172) is circa 9.6km to the east of the appeal site.
- Wicklow Mountains Special Area of Conservation (Site Code: 002122) is 6km south of the site.
- Wicklow Mountains Special Protection Area (Site Code: 004040) is 6.2km to south of the site.

5.3. **EIA Screening**

- 5.3.1. Having regard to nature and scale of the development and the location of the site, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 **The Appeal**

6.1. **Grounds of Appeal**

- 6.1.1. An agent for Parkvale & Ballyolaf Residents Association has submitted an appeal against the decision of the Planning Authority to grant permission. The appeal states that the proposed entrance for St Tiernan's Community School the school was never developed and that permission for the temporary entrance between no.s 24 and 25 Parkvale to be permanent was never sought. It is submitted that this entrance causes significant traffic disruption. The Appellant supports the proposed development in principle but seeks to permanently close the existing unauthorised entrance. It is submitted that any development that intensifies the serious negative impacts must be refused.
- 6.1.2. The grounds of the appeal can be summarised as follows:
- The Planning Authority sought to refuse permission for the proposed two-storey school (D18A/01865 / ABP-303041-18) on the grounds of traffic hazard at Wyckham Way and the impact of the access on the residents of Parkvale.
 - Notwithstanding that the Planning Authority raised concerns about the proximity of the proposed pitch to Dun Emer Drive, the Planning Authority's report states that it

considers there to be no other option. It is submitted that where negative impacts have been identified, it is unacceptable that future development constraints have been taken into account, particularly where those future developments have not been identified.

- In the absence of a masterplan for the entire site, including appropriate access arrangements, the proposed development is premature.
- Permission for a school on the subject site has been refused three times by DLRCC: (D12A/0488, D13A/0670 and D18A/0865). *The Board will note that An Bord Pleanála has subsequently granted permission for the third application D18A/0685 under file number ABP-303041-18.* Each time permission was refused by the Planning Authority on the grounds of traffic nuisance. Further, the Inspector assessing PL06D.RL3073 considered that the “intensification of the existing access through Parkvale would be unacceptable”.
- A meaningful consideration of alternative access arrangements has not been carried out, notwithstanding that access arrangements have repeatedly been raised as a concern by both the Planning Authority and the Board.
- The subject development does not address the considerable traffic nuisance caused by the existing entrance, nor does it achieve a comprehensive and balanced solution to the ongoing access issues noted by the Planning Authority and the Board previously. The Board must refuse permission on the grounds that the proposed development will exacerbate already grossly substandard access arrangements.
- The subject application does not provide sufficient information on the proposed non-school use of the facility. This level of detail is required by section 8.2.12.4 of the development plan.
- The application does not include a traffic impact assessment. The existing temporary access gate is wide enough to allow only one vehicle. This causes queueing. The access to no. 25 Parkvale is not visible to vehicles leaving the school and vehicles existing no. 25 cannot see vehicles existing St Tiernan’s.
- The proposed development does not assess the impact of the additional traffic of extension of traffic flow times, the provision of car parking, or the cumulative impact of existing and proposed weekend activities. Given the long history of

severe traffic issues, this omission is significant. The applicant should be requested to address the following: baseline traffic, impact on non-school use such as Lakelands FC Mini World Cup, cumulative impact of evening and weekend uses and the cumulative impact of all uses on site.

- It is noted that the school has capacity for 1,000 students. This is a considerable increase on the current enrolment of 543 daytime students. The potential traffic impacts are significant.
- Condition no. 2 of the Planning Authority's decision does not accord with section 8.2.12.4 of the development plan which requires details of non-school use before permission is granted.
- Condition no. 2 permits unlimited use of the proposed pitch with no regard for the impact of such uses. This is contrary to the development management guidelines which requires that conditions be clear and concise.
- The Board is requested to refuse permission.

6.2. Planning Authority Response

- 6.2.1. The grounds of the appeal do not raise any new matter which would justify a change in attitude to the proposed development.

6.3. Observations

6.3.1. Inland Fisheries Ireland

- Future development should not cause any degradation of the fishery habitat or water quality of the Slang, which is an important salmonid system. The Slang has significant potential for rehabilitation.
- Only clean uncontaminated waters must be permitted to discharge to the surface water network, to protect the ecological integrity of the River Dodder.
- Any dewatering from planned excavation must be via settlement areas.
- All measures necessary must be taken to ensure the protection of local aquatic ecological integrity by complete avoidance and mitigation if necessary.
- All discharge must be in compliance with the European Communities (Surface Water) Regulations 2009 and the European Communities (Groundwater) Regulations 2010.

6.3.2. **Kevin Deane**

- The position of the applicant is based on an underestimation of the likely traffic generated.
- The temporary Parkvale entrance has been used for 40 no. years. The existing traffic problems will be exacerbated.
- The Applicant have missed the point that there should not be any St Tiernan's traffic through Parkvale.
- An alternative access must be sought.
- The suggested 10 no. car trips is disingenuous. As is the suggestion that significant additional traffic will not arise due to the restriction to daytime use only.
- The application is silent on the impact of construction traffic.
- The proposed covering of the existing playing pitch with an artificial surface is absurd.
- The Board is requested to refuse permission.

6.3.3. **R.A. Daughton**

- Objects to the proposed development on the grounds that it will intensify the use of a temporary access.
- The existing access is unsuitable. Heavy construction traffic will further endanger the residents of Parkvale. Who will meet the cost of repairing the damage?
- The school requires a permanent access, both vehicular and pedestrian.
- An alternative route is via Gort Mhuire (now a public road). Houses are being constructed within the walled garden. The disused footway would give easy access to meet an internal roadway.

6.3.4. **Lt-Col Sean McCarrick**

- Was the first resident of Parkvale, having lived on Sandyford Road. Residents sought to ensure that the entrance to the school would be temporary.

- The opportunity to provide an entrance through Gort Mhuire was missed. The Parkvale estate cannot provide this.
- Land for extra parking must be made available within St. Tiernan's
- This ongoing problem has never been dealt with in a fair and just manner.

6.4. Further Responses

6.4.1. Applicants Response to Appeal

- The proposed development will contribute to the established educational use of the existing school by formalising the existing green spaces.
- No flood lighting is proposed. Existing boundary treatments to the rear of adjoining dwellings will be supplemented.
- During school hours the pitch will be used by the school, outside school hours use will be restricted to daytime and therefore minimal additional traffic will be generated.
- There is a clear need to protect the development potential of the overall site. The pitch is proposed at the optimal location, leaving the remainder of the site for future educational uses.
- While it was not possible to realign the pathway adjoining no. 47 Dun Emer Drive, it must be noted that there is an informal pathway at this location. Proposed additional planting will formalise and improve this arrangement.
- The Planning Authority took a balanced approach to the proposed development. The proposed pitch and the concurrent school can function independently or in conjunction. The decision of the Planning Authority to refuse permission for the school is not relevant to the subject development.
- Whilst the concurrent primary school proposes alternative traffic management proposals, these are not relevant to the subject proposal.
- Regarding intensification of the existing access, the primary users of the proposed pitch will be the existing school, during school hours.
- Some additional use outside school hours will occur, in accordance with page 158 of the development plan. Trip generation rates are predicted to be 10 no. inbound and outbound per hour.

- The use of the school for evening classes occurs outside daylight hours. Daylight ends at approx. 4pm in winter. There is limited scope for use of the pitch at the same time as the evening classes. No significant intensification of the site entrance is predicted. Cumulative impacts are limited.
- The Board Inspector assessing an all-weather pitch at St. Raphaels (PL06D.207418) considered the use of a pitch to be ancillary to the main use of the school in question and therefore any additional traffic would be insignificant.
- The predicted 20 no. trips per hour is approx. 0.9% of the total capacity of Parkvale. Significant cumulative impacts will not occur as uses will generally not occur at concurrent times.
- The existing entrance has been in existence for 40 no. years, with an access road in excess of the 7.3m width required by DMURS.
- The applicant is happy to accept a condition requiring pitch users to use only the 63 no. parking spaces within the site.
- The future enrolment of the school has no bearing on the ancillary use of the proposed pitch.
- Regarding condition no. 2 of the Planning Authority's decision, it is submitted that there is limited opportunity for intensification of use of the pitch due to the lack of floodlights and therefore the inability to be used outside daytime hours.
- The Board is requested to grant permission.
- The response was accompanied by an Engineering Report relating to traffic issues. The report states that traffic counts were undertaken in April 2018. Based on the survey, predicted traffic generation is 20 no. trips per hour. The impact on the surrounding road network is stated to be negligible.

6.4.2. **Appellants Response to Applicants Response**

- While the appellants support the proposed development in principle, it is nonetheless contrary to the proper planning and sustainable development of the area.
- The Appellants do not accept the 40-year use of the temporary access as justification for its continued and intensified use.
- The long history of the temporary and unsuitable use of the access and its impact on the Parkvale Residents starts in 1984.
- The applicant's comparison of the major distributor road Sandyford Road with the small cul-de-sac residential Parkvale is not accepted.
- The proposed development fails to address the significant traffic issues.
- The applicants claim that non-school use of the proposed development is "not relevant" is rejected. Improved facilities will lead to an increase in enrolment and an increase in traffic.
- The appellants are concerned about the combined effect of all existing and proposed uses. The two-storey sports hall granted under ABP-303041-18 may be opened to the public which would significantly increase non-school hour traffic.
- It is not possible to know the true impact on traffic without full details on the proposed usage. It is not credible to suggest that only 10 no. inbound and outbound trips will be generated.
- The potential for overflow parking in Parkvale is high given the existing access difficulties.
- The appellants seek a comprehensive and balanced solution to the development of the overall site.

7.0 Assessment

7.1.1. I have examined the file and the planning history, considered national and local policies and guidance, the submissions of all parties and inspected the site. I have assessed the proposed development and I am satisfied that the issues raised adequately identify the key potential impacts and I will address each in turn as follows:

- Principle of development
- Traffic

7.2. Principle of the Proposed Development

7.2.1. Whilst the subject site is zoned for the protection and / or improvement of residential amenity, the education use of the wider St. Tiernan's site is long established and has been the subject of a number of decisions by the Board to grant permission. The use of 'sports facility' within Zone A is open for consideration.

7.2.2. As the proposed all-weather pitch is primarily for the use of the existing school, it is considered that the proposed development is acceptable in principle.

7.2.3. I note that one of the Observers raised the issue that the proposed artificial all-weather facility would replace an existing green-field playing pitch. The proposed all-weather pitch and ancillary netting, dug-outs etc would allow more efficient use of the area, allowing for use all-year round, not being dependent on weather conditions.

7.3. Traffic

7.3.1. I note that the appellants do not object to the proposed all-weather playing pitch. Their primary concern is the impact this will have on the existing entrance to St Tiernan's school, which runs through the residential housing estate Parkvale. The appellant makes the case that the existing entrance was intended to be a temporary access and that a permanent access would be delivered at some point – although it is not entirely clear where the permanent access was proposed. The appellant and the Observers make the case that further granting of permissions on the site not only intensifies what they consider to be a problematic use of the entrance but also reinforces the position that the entrance is no longer considered temporary.

- 7.3.2. The issue of the existing entrance to the school through Parkvale has been addressed by the Board on three occasions – RL3073, PL06D.243128 and ABP-303041-18. Under the reference case PL06D.RL3073, the Board considered that there were no adverse impacts in terms of traffic safety from the use of the part of the secondary school as a primary school.
- 7.3.3. In deciding to refuse outline permission for a two-storey school on the site with a new access point off Wyckham Way under PL06D.243128, the Boards reasons and considerations states that the proposed new entrance would be a traffic hazard. The reason noted the high-capacity transport corridor of the route and its importance in linking the M50 and the Dundrum Town Centre and considered that an additional entrance would endanger road users. The Board Order included a note – referred to by the third-parties – which called for a co-ordinated approach to providing an alternative access to the lands, to allow the full development potential of the overall site to be realised.
- 7.3.4. The issue of the access was presented to the Board again when permission was sought for the construction of a two-storey school, ancillary recreational facilities and a two-storey sports hall under ABP-303041-18. A decision to grant was made by the Board on the 5th June 2019, whilst this current appeal was before the Board. The Board will note that the Masterplan drawing (drawing no. PLN.100rev C) submitted with this subject appeal shows access to the school through the proposed Wyckham Way access. As noted above, condition no. 2 of the Boards decision omitted the proposed access from Wyckham Way and requested that the internal roads and turning areas within the school lands be altered to provide for two-way traffic through the existing access point in Parkvale. Revised drawings showing compliance with the condition are to be submitted to the Planning Authority for written agreement.
- 7.3.5. It is considered that the decision of ABP-303041-18 reaffirms the Boards objection to the creation of a new vehicular access point onto Wyckham Way and their acceptance of the use of the Parkvale access point for the wider school lands.
- 7.3.6. The Inspectors report under 303041 assessed the impact on the surrounding road network. She concluded (paragraph 7.2.17) that the existing road within Parkvale had capacity to accommodate the additional vehicular traffic that would be generated by the primary school and sports centre. The Board concurred with this conclusion and attached condition no. 3 which requires that the submitted School Travel Plan be

fully implemented, monitored and reviewed, that school opening times be staggered, that a pedestrian walkway onto the Greenway be provided and finally that the developer pay the full cost of any parking control measures the Planning Authority decided to implement.

- 7.3.7. Having regard to the above decision, it is considered that the principle of using the existing Parkvale entrance for the lands associated with St. Tiernan's has been established. The question before the Board therefore is the volume of traffic that will be generated by the proposed pitch and whether the existing entrance has capacity to absorb that extra traffic.
- 7.3.8. I note that the Boards decision under ABP-303041-18 will provide for a two-way lane within the school grounds. This will alleviate the queuing concerns at the Parkvale entrance, raised by the Observers and the Appellant.
- 7.3.9. A number of factors will affect the use of the pitch. First, as noted above, no floodlights are proposed. This will naturally restrict the hours of use during winter-time when the school site is most intensively used. Regarding the third-party's submission regarding the schools use for evening classes, I accept that this will not coincide with pitch use as evening classes occur outside of daylight hours and school hours.
- 7.3.10. Secondly, the third-parties raise the concern that the Planning Authority's decision to facilitate community use of the pitches (condition no.2) would provide for unlimited or unrestricted use of the pitch. Again, the lack of floodlights will naturally restrict this use. The pitch cannot be made available during school hours as it will be used by the school and cannot be made available for the community during darkness. Use of the pitch during the summer will occur, when limited if any, use of the school building occurs and therefore the traffic to the site and through the entrance will be insignificant.
- 7.3.11. The Applicant has submitted that having regard to the availability of the pitch, it is predicted that the proposed traffic generated will be in the order of 20 no. vehicles per hour. An engineering report addressing the traffic issues raised in the appeal was submitted by the Applicant in response to the third-party appeal. The report states that a traffic survey was undertaken between 18.00 and 19.00 in April 2018, recording 10 no. inbound trips for the schools evening courses. The traffic counts carried out at the Parkvale junction with Sandyford Road recorded 41 no. inbound

trips and 26 no. outbound trips during the same survey hour. The report states that the predicted 10 no. trips to be generated by the pitch is based on “modal split information available for the area” and “a review of similar facilities”. It is regrettable that the data and / or sources of this modal split and review was not made available to the Board. It is understandable, given the lack of detail, that the observers have queried this figure. Given that an all-weather pitch could potentially field two teams of up to 15 no. depending on the sport, plus coaches, managers, supporters – all potentially arriving in separate vehicles, I am minded to agree that the 10 no. trip figure is lower than expected. Further, should games be played during school hours, visiting teams could arrive in coaches / mini-buses. This has not been addressed by the applicant’s report.

7.3.12. The Board must also consider that the existing Parkvale entrance, following the decision under 303041 will now account for the primary school and two-storey sports facility traffic also.

7.3.13. Notwithstanding that I consider the proposed use to be acceptable in principle, it must be recognised that the existing entrance in Parkvale will now accommodate the secondary school, the recently permitted primary school, the recently permitted sports facility and potentially the all-weather playing pitch. Having regard to this, it is considered that the cumulative impact on Parkvale must be assessed. Noting that the Board previously requested the applicant to provide a co-ordinated, comprehensive and balanced solution to the overall site, it is regrettable that such a masterplan approach was not adopted.

7.3.14. Given the lack of information regarding the extent of traffic to be generated by the all-weather pitch and the new traffic circumstances created by the Board decision under ABP-303041-18, it is considered that there is no option but to refuse permission. Should the Board agree that the proposed development is acceptable in principle, the option of requesting the developer to address both concerns remains available. This would also allow the developer to address the Boards request for a two-way lane and turning area within the grounds.

7.4. **Appropriate Assessment**

7.4.1. The applicant submitted a screening statement for Appropriate Assessment. The report notes that there are no known flora or fauna species of particular conservation

value on the site. The River Slang, a tributary of the Dodder River immediately adjoins the site to the north.

- 7.4.2. The report states that the relevant source-pathway-receptor links relate to generated foul and surface waters via the drainage network and the proposed construction works. The report states that these are not likely to pose any significant impact on the existing European sites. The attenuation, treatment and disposal of foul and surface waters leaving this site would not result in any known deleterious impact on the qualifying interests of the Natura 2000 sites. The separation distances, short-term nature, and application of the construction management plan provisions should ensure there would be no likelihood of any impacts on the conservation sites. There are no known developments in the vicinity of this site that would give rise to cumulative impacts.
- 7.4.3. Overall, it is reasonable to conclude that, on the basis of the information on the file which I consider adequate in order to issue a screening determination, the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on Dublin Bay South SAC or South Dublin Bay and River Tolka Estuary SPA. A Stage 2 Appropriate Assessment is, therefore, not required.

8.0 Recommendation

- 8.1. It is recommended that permission be REFUSED for the following reason:

- 1 Having regard to the decision of the Board under ABP-303041-18 and the resultant impact on the existing entrance to St Tiernan's from within the Parkvale residential housing estate, and having regard to the lack of verifiable information regarding the likely traffic to be generated by the proposed all-weather playing facility, it is considered that the Board cannot determine the cumulative impact on the existing entrance in Parkvale and therefore cannot conclude that the proposed development would not endanger the safety of road users, including cyclists and pedestrians, by reason of traffic hazard or obstruction. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Gillian Kane
Senior Planning Inspector

19 July 2019