



An  
Bord  
Pleanála

## Inspector's Report

### ABP-319774-24

#### Development

Development consisting of repair, restoration and refurbishment of the derelict Roebuck Grove House for the construction of a four-storey extension to provide a 29 bedroom hostel and all associated site works.

#### Location

Site at Roebuck Grove House, Our Lady's Grove, Goatstown Road, Dublin 14, D14 X9T3

#### Planning Authority

Dun Laoghaire Rathdown County Council

#### Planning Authority Reg. Ref.

D24A/0133

#### Applicant(s)

Prinjen Limited.

#### Type of Application

Permission.

#### Planning Authority Decision

Refuse.

#### Type of Appeal

First Party.

#### Appellant(s)

Prinjen Limited.

#### Observer(s)

Various, see Section 6.3.

**Date of Site Inspection**

21<sup>st</sup> January 2025.

**Inspector**

Terence McLellan

## **1.0 Site Location and Description**

- 1.1. The appeal site refers to Roebuck Grove House and grounds, located at Our Lady's Grove, Goatstown Road, Roebuck, Dublin 14. The site measures c.0.0967 hectares and is regularly shaped. Although not designated as a Protected Structure or listed on the NIAH, Roebuck Grove House is a building of local architectural and historic significance. The original building dates from c.early 19<sup>th</sup> century and is two storey above lower ground level, although it is currently in a significant state of dereliction. The site is currently hoarded, with gated access onto the Grove.
- 1.2. The site is located within a fairly new residential area known as The Grove which is accessed from Goatstown Road. The residential estate comprises five storey apartments fronting onto Goatstown Road and a mixture of two and a half storey terraced dwellings and three storey duplexes. The site itself is bounded to the north by The Grove and Our Lady's Grove Secondary School (three storey) and Primary School (two storey). To the east the site is bounded by a small, well planted area of incidental open space and the gable of the adjacent two and a half storey terraced dwellings. The site shares its southern boundary with No. 22 The Grove, a two and a half storey end of terrace property. The western boundary comprises undeveloped land.

## **2.0 Proposed Development**

- 2.1. Planning permission is sought for the repair, restoration, and refurbishment of Roebuck Grove House, incorporating a four storey extension over lower ground level to provide a 29 bedroom hostel for displaced persons. The accommodation would include shared kitchen, dining/lounge, and laundry facilities. Three car parking spaces would be provided, inclusive of an accessible bay, in addition to two motorcycle spaces and 10 cycle parking spaces.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

3.1.1. Notification of the Decision to Refuse Permission was issued by Dún Laoghaire-Rathdown County Council on 29<sup>th</sup> April 2024 for the following three reasons:

1. The strong design contrast and abrupt difference in height, coupled with its bulk, siting, proximity and massing of the new-build element to Roebuck Grove House would result in an unacceptable degree of negative impact upon the character and setting of this vernacular building, an unduly abrupt and excessive transition in height and massing, and a discordant element when viewed on the streetscape. It is therefore considered that the subject development is contrary to the provisions of Sections 11.4.3.2 Policy Objective HER20: Buildings of Vernacular and Heritage Interest and 11.4.3.3 Policy Objective HER21: Nineteenth and Twentieth Century Buildings, Estates and Features of Dún Laoghaire-Rathdown County Development Plan 2022-2028 and would be contrary to the proper planning and sustainable development of the area.
2. The bulk, siting, proximity and massing of the new-build element to the adjacent row of terraced houses to the south, would result in a visually obtrusive, dominant and overbearing development as viewed from the rear amenity and front curtilage areas of the adjacent row of dwellings. It is therefore considered that the subject would seriously injure the residential and visual amenities of the surrounding properties and would be contrary to the proper planning and sustainable development of the area.
3. The subject development comprises a significant shortfall of quality communal open space appropriate for such use, and also in relation to its size and its setting and character of surrounding receiving environment. This would result in an unacceptable level of residential amenity for initial and future occupants and would run contrary to the provisions of Guidelines for Development of New Emergency Accommodation' (DoPHLG, 2022) and Section 12.8.3.2 Communal Open Space of Dún Laoghaire-Rathdown County Development Plan 2022-2028. As such, the development

represents substandard development and would be contrary to the proper planning and sustainable development of the area.

### **3.2. Planning Authority Reports**

3.2.1. The Planner's Report contains the following points of note:

- Roebuck Grove House has been subject to extensive damage and dilapidation.
- Residential Institutions are 'Permitted in Principle' under the zoning objective.
- The hostel is intended to accommodate 'displaced persons'. A hostel under the definition of residential institution does not have specific development management criteria in the CDP.
- The scheme may be considered under the provisions of section 12.5.2: Aparthotel of the CDP, although it is noted that occupancy periods may exceed the requirements set out in this policy, so the policy should only be considered as a guiding principle.
- The scheme can also be considered under the Guidelines for Development of New Emergency Accommodation. Whilst the scheme is not referred to as 'Emergency Accommodation' in public notices, reference is made to it in the supporting policy rationale.
- Siting is guided by the Guidelines for Development of New Emergency Accommodation, the site is close to public transport linking to employment and recreation, and there are a number of schools in the area.
- Concerns with the viability of the development due to 100% of the units being one bedroom. There is a lack of detail with regard to the breakdown of prospective residents as there are specific standards and provisions required for emergency accommodation depending on its occupancy (single, youth, family households), as outlined in the Guidelines.
- Minimum bedroom space set out in the Guidelines have been met. It is considered that the bedrooms align with a studio definition in terms of scale and height. Although not directly subject to qualitative space standards, if Section 12.3.5.5 Minimum Apartment Floor Areas) were applied then the units would fall 10sqm short of the most modest studio requirements. There are therefore concerns regarding the future level of amenity the units would provide.

- Floor to ceiling heights at ground floor level are 2.58m – 2.68m which is below the 2.7m requirement of Section 12.3.5.6 of the CDP.
- The Guidelines require 0.7sqm of lockable storage space to be provided for each bedspace. It is noted that wardrobes are provided for each unit, but it is unclear if the standards have been met.
- There is no information on how the scheme would be operated and managed.
- Communal amenity space is considered to be poor in terms of its area, configuration, and lack of aspect and openness. While there are no specific parameters for open space for the proposed use, applying Section 12.8.3.2 of the CDP means that there would be a 46sqm shortfall, with only a 60% provision. The nearest parks are located at least a 17 minute walk (1.2km) away and no private space is provided. There would therefore be unacceptable level of residential amenity for future occupants.
- The height, bulk, siting, and massing of the development would have an unacceptable degree of adverse impact on Roebuck Grove House, a vernacular building, compromising its character. The scheme would be contrary to Policy Objectives HER20 and HER21 of the CDP.
- The development would also represent an unduly abrupt and excessive transition in height and massing, a discordant element when viewed on the streetscape and visually obtrusive and overbearing when viewed from the rear garden and front areas of the adjacent dwellings.
- The scheme is not subject to use specific density requirements but assuming full occupancy, the development would have a density of 300 uph which is excessive in a locale where the Compact Settlement Guidelines indicate a target density of 40-150uph.
- Parking provision (two spaces) is acceptable in principle, however in the case where further detail as provided in relation to the social and infrastructural needs of occupants/families, this position would be subject to review.
- Methodology pertaining to trip generation for the relevant prospective use has not been provided within the submitted Mobility Management Plan.
- Discrepancy noted between the 'blue-line' boundaries delineating land ownership and some of the drawings do not clearly highlight the surrounding context of closely adjacent buildings.

### **Other Technical Reports**

- 3.2.2. **Building Control (08.04.24):** Any areas within the development that are proposed to be Taking-In-Charge shall comply with the Council's requirements.
- 3.2.3. **Conservation (15.4.24):** Welcome the proposal to restore the original house and bring it back into use but concerns are raised regarding the scale of the extension which would have an overpowering visual impact and unwelcomed encroachment on the parent building. Recommend reducing the scale, height and massing of the proposed extension to the rear so that it is more in-keeping with the scale of the original 19th century Grove House, should Further Information be sought. Conditions recommended in the event that planning permission is granted.
- 3.2.4. **Drainage (15.04.24):** Further Information recommended on run-off rates, surface water drainage, and attenuation. FI was not requested given the substantive reasons for refusal.
- 3.2.5. **Environmental Health Officer (11.04.24):** No objection, subject to conditions.
- 3.2.6. **Housing (04.04.24):** The provision of Hostel accommodation is considered exempted from the requirements of Part V.
- 3.2.7. **Public Lighting (05.04.24):** Bollard Lighting is not recommended on health and safety grounds. There is no requirement for a lighting design for this development and no lighting is needed.
- 3.2.8. **Transport (05.03.24):** No objection, subject to conditions.

### **3.3. Prescribed Bodies**

- 3.3.1. **Irish Water (16.04.24):** No objections. Standard observations were made regarding connection agreements, infrastructure capacity/constraints, and compliance with Irish Water Standards codes and practices.

### **3.4. Third Party Observations**

- 3.4.1. A total of 40 observations were submitted in response to the planning application. These are summarised in the Planner's Report and are on file for the Board's information. In my opinion, the issues raised are similar to the observations made on the appeal which are set out in detail in section 6.4 below.

## 4.0 Planning History

### *Subject Site*

- 4.1.1. There is a detailed planning history for The Grove, previous decisions with specific relevance to the current proposal are as follows:
- 4.1.2. **Planning Authority Reference D06A/0858:** Permission was granted by DLRCC in September 2017 for 109 no. residential units in 4 no. blocks up to five storeys in height and a residential institution building (convent; 24 no. beds), 176 no. car parking spaces (166 no. in basement), new vehicular and pedestrian accesses from Goatstown Road.
- 4.1.3. **Planning Authority Reference D11A/0349:** Permission was refused by DLRCC in September 2011 for amendments to permitted scheme (D06A/0858) comprising a reduction in the number of residential units from 102 no. units permitted to 45 no. units to comprise 21 no. apartments, 10 no. duplex units and 14 no. houses and change of use from childcare to residential of Roebuck Grove House, omission of basement car parking, alterations to access road and roundabout. Permission refused due to (i) inadequate public open space, (ii) Block 6 is inadequate in floor area, storage and private open space and (iii) inadequate car parking provision.
- 4.1.4. **Planning Authority Reference D11A/0595:** Permission was granted by DLRCC in June 2012 for amendments to permitted scheme (Reg. Ref. D06A/0858) comprising a reduction in the number of residential units from 102 no. units permitted to 40 no. units to comprise 17 no. apartments, 9 no. duplex units and 14 no. houses and change of use from childcare to residential of Roebuck Grove House, omission of basement car parking, alterations to access road and roundabout and associated works. An extension of duration of permission was granted in 2017 under Reg. Ref. D11A/0595/E.
- 4.1.5. **Planning Authority Reference D15A/0199:** Permission was granted by DLRCC in November 2015 for amendments to permitted scheme (Reg. Ref. D11A/0595) to replace permitted terrace 1 (4 no. apartments plus 4 no. duplex units) with a 4-storey building comprising 16 no. apartments.
- 4.1.6. **Planning Authority Reference D16A/212:** Permission was granted by DLRCC in October 2016 for amendments to D11A/0595 primarily comprising alterations to



Terraces 4, 5 and 6 reducing the permitted scheme's total number of residential units from 47 no. permitted to 41 no.

*Adjacent sites (undeveloped land to the west)*

- 4.1.7. **ABP-309430-21:** Permission was granted by the Board in June 2021 for a Strategic Housing Development comprising 698 no. student bedspace accommodation and associated site works. This permission is currently subject to Judicial Review proceedings.
- 4.1.8. **ABP- 304420-19:** Permission was granted by the Board in 2019 for 132 no. residential units (19 no. houses and 113 no. apartments) and a childcare facility on the subject site. This decision was subsequently quashed by the courts.

## 5.0 Policy Context

### 5.1. Dún Laoghaire-Rathdown County Development Plan 2022-2028

- 5.1.1. The site is zoned Objective 'A', the stated objective of which is 'to provide residential development and improve residential amenity while protecting the existing residential amenities.'
- 5.1.2. Chapter 2 of the CDP is the Core Strategy which sets out the settlement and growth strategy for the County, taking into account housing need, residential capacity, population growth, compact growth, and regeneration.
- 5.1.3. Chapter 3: Climate Action, sets out the detailed policy objectives in relation to climate and the role of planning in climate change mitigation, climate change adaptation and the transition towards a more climate resilient County.
- CA6: Retrofit and Re-use of Buildings - promotes the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible recognising the embodied energy in existing buildings and thereby reducing the overall embodied energy in construction.
  - CA10: Renewable Energy
- 5.1.4. Chapter 4: Neighbourhood – People, Homes and Place, sets out the policy objectives for residential development, community development and placemaking, to deliver

sustainable and liveable communities and neighbourhoods. The relevant policy objectives from this chapter include:

- PHP13: Equality, Social Inclusion, and Participation - to promote equality and progressively reduce all forms of social exclusion that can be experienced because of gender, gender identity, marital status, family status, age, race, religion, disability, sexual orientation, nationality, homelessness and membership of the Traveller Community and promote active participation consistent with RPO 9.1 and RPO 9.2 of the RSES.
- PHP20: Protection of Existing Residential Amenity - to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.
- PHP25: Housing for All – to support as appropriate the delivery of the actions set out in the 4 pathways contained in ‘Housing for All – A new Housing Plan for Ireland, 2021’.
- PHP32: Homeless Accommodation - to support the provision of homeless accommodation and/or support services throughout the County.
- PHP35: Healthy Placemaking - to ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.
- PHP36: Inclusive Design and Universal Access - to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.
- PHP42: Building Design and Height – to encourage high quality design in all new development and to ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5.

5.1.5. Chapter 5: Transport and Mobility, seeks the creation of a compact and connected County, promoting compact growth and ensuring that people can easily access their homes, employment, education and the services they require by means of sustainable transport. The relevant policy objectives from this chapter include:

- T11: Walking and Cycling
- T19: Car Parking Standards

5.1.6. Chapter 8: Green Infrastructure and Biodiversity includes policies for the protection, creation, and management of this resource in an integrated manner by focusing on key themes within GI such as: landscape and the coast; access; biodiversity; and parks.

5.1.7. Chapter 9: Open Space, Parks and Recreation recognises that having safe and easy access to a network of open space and parks, means that the recreational needs of residents are met, while enhancing their health and well-being. The relevant policies from this chapter include:

- OSR4: Public Open Space Standards

5.1.8. Chapter 10: Environmental Infrastructure and Flood Risk recognises the critical importance of high quality infrastructure networks and environmental services in creating sustainable, healthy, and attractive places to live and work.

5.1.9. Chapter 11: Heritage and Conservation includes specific objectives and guidance relating to the protection of the County's heritage including architectural heritage. The relevant policies from this chapter include:

- HER20: Buildings of Vernacular and Heritage Interest - It is a Policy Objective to:
  - i. Retain, where appropriate, and encourage the rehabilitation and suitable reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape in preference to their demolition and redevelopment and to preserve surviving shop and pub fronts of special historical or architectural interest including signage and associated features.
  - ii. Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts, pub fronts and other significant features.
  - iii. Ensure that appropriate materials be used to carry out any repairs to the historic fabric.

5.1.10. Chapter 12: Development Management contains the detailed development management objectives and standards that are to be applied to proposed developments. The relevant sections of this chapter include:

- 12.4.5: Car parking Standards
- 12.4.6: Cycle Parking
- 12.4.7: Motorcycle Parking
- Appendix 5: Building Height Strategy

## 5.2. **Regional Policy**

### **Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031**

The primary statutory objective of the strategy is to support implementation of Project Ireland 2040 - which links planning and investment through the National Planning Framework (NPF) and ten year National Development Plan (NDP), and the economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the region. Regional Policy Objective 9.6 seeks to support local authorities and other relevant agencies such as the Dublin Region Homeless Executive in relation to addressing the issue of homelessness in the Region.

## 5.3. **National Policy**

### **The National Planning Framework - Project Ireland 2040**

5.3.1. The NPF provides an overarching policy and planning framework for the social, economic and culture development of the country. An important element of the growth strategy, intrinsic to the NPF, is securing compact and sustainable growth as it offers the best prospects for unlocking regional potential. The preferred approach for compact development is one which focuses on reusing previously developed 'brownfield' lands and development of infill sites and buildings. To this end the NPF requires at least 30% delivery of all new homes in settlements (outside of the 5 cities) to be within the existing built up footprint (NPO 3(c)).

## 5.4. **Other Relevant Guidance**

- 5.4.1. Guidelines for New Emergency Accommodation (DoHLGH 2022) –The guidance relates primarily to the conversion of existing buildings that are being considered by local authorities and AHBs to be acquired to provide emergency accommodation. However, the guidance notes that the space and other standards should equally apply to specifically designed new built accommodation. Guidance is provided on suitable locations for accommodation as well as accommodation standards and minimum requirements.

## **5.5. Natural Heritage Designations**

- 5.5.1. There are no European Sites within the boundary of the appeal site nor are there any European Sites directly abutting the appeal site or within its immediate context. The nearest European Site is the South Dublin Bay and River Tolka Estuary SPA (Site Code 004024) approximately 2.75km to the east/north east, and the South Dublin Bay SAC (Site Code 000210) approximately 2.85km away on the same bearing.

## **5.6. EIA Screening**

- 5.6.1. See completed Form 2 on file. Having regard to the nature, size and location of the proposed development and to the criteria set out in Schedule 7 of the Regulations I have concluded at preliminary examination that there is no real likelihood of significant effects on the environment arising from the proposed development. EIA, therefore, is not required.

## **6.0 The Appeal**

### **6.1. Grounds of Appeal**

- 6.1.1. A First Party appeal has been submitted by Thornton O'Connor Town Planning, for and on behalf of the Applicant, Prinjen Limited, against the decision of Dún Laoghaire County Council to refuse planning permission for the proposed development. The appeal was accompanied by a report from Garrett O'Neil, Conservation Architect. The grounds of appeal can be summarised as follows:
- 6.1.2. Reason for Refusal 1 – Design and Heritage

- Roebuck Grove House has not been deemed worthy of protected status, the building has been vacant for decades, is in a very poor state of repair, and significant investment will be required to bring it back into use with retention of the building being more expensive than demolition.
- The Applicant is seeking to retain and refurbish the building, the increased height and the strong design contrast is intentional, to allow the two parts of the building to be read separately and to allow the contrast between historic and contemporary.
- The building lacks the significance under any category required to warrant protection under the Planning Act, the Conservation Section welcomed the reinstatement of the partially collapsed building and did not recommend that permission be refused.
- New build accommodation is required to the rear in order to allow a viable development, considering the significant costs of retaining and refurbishing Roebuck Grove House.
- The development would rescue a historic building which is in a poor state of repair. The development would be designed to a high standard with quality sustainable materials providing a low energy building.
- Contemporary design should not be refused in order to preserve a partially collapsed ruin of a historic structure.
- Heritage Protection Guidelines state that Protected Structure status does not mean that a structure is forever frozen in time. This should also apply to the subject building which is not subject to the same limitations as protected structures.
- There are many examples of hybrid buildings incorporating historic fabric and contemporary architecture. Examples given include Capel Street hotel development, Tropical Fruit Warehouse office development, and the Mayson Hotel on North Wall Quay.

#### 6.1.3. Reason for Refusal 2 – Amenity

- The proposal would not have a negative impact on the daylight/sunlight of neighbouring dwellings, nor would there be impacts in terms of overlooking/privacy.

- The parapet height is just 3.95 metres higher than the ridge of the adjacent dwellings and does not lead to a material adverse impact on adjacent homes.
- Greater heights have been approved by the Board in the immediate area, including a student housing scheme up to six storeys in height which is on a directly adjacent site.
- This is an underutilised infill site where there is an opportunity to densify.
- The lower density dwellings should not dictate the future form of development in the area, particularly with regard to the location relative to public transport, shops, services, schools and third level institutions.
- There are many examples of additional height being permitted next to lower density dwellings including Woodlands Park in Blackrock, Roselawn and Aberdour on Stillorgan Road, and a recent development approved by the Board in Glasthule.
- The development would not be overbearing or visually dominant and would be an appropriate massing in its receiving context. The visual transition is not inappropriate.
- An amended scheme has been put forward as part of the appeal, which omits a floor level.

#### 6.1.4. Reason for Refusal 3 – Shortfall of Communal Amenity Space

- The Planning Authority have assessed the scheme against the standards for an Aparthotel which is flawed. An Aparthotel is a different use with different end user requirements to the proposal and it is not acceptable to substitute one use for another because there are no particular management standards in the Statutory Plan for a particular use.
- The Planning Authority also compare the development with residential studios and use the communal open space standards for residential development in order to calculate the schemes requirements which is not appropriate.
- The Statutory Plan does not require communal open space for hostel use and as such communal open space standards do not apply.
- Applying a provision of the Development Plan that relates to residential development to hostel accommodation is entirely unreasonable and should not

have culminated in a reason for refusal, taking into account Section 7.15 of the Development Management Guidelines.

- Guidelines for the Development of New Emergency Accommodation state that access to a shared open space or garden or convenience to a public park should be considered. It acknowledges that a dedicated private open space may be difficult to provide but where possible, some provision of open space, shared but private to residents, should be provided.
- The development has clearly considered the provision of a shared communal amenity space and provides communal courtyards totalling 70 sqm.
- The site is close to Rosemount Green, approximately 600m away and closer than the parks identified by the Planning Authority.
- The approved student housing scheme adjacent to the site includes substantive public open space in the form of a linear park, although this case is subject to Judicial Review.

6.1.5. Conservation Response by Garrett O'Neill of Cathal O'Neill and Company (Architects)

- The term historic is more appropriate to describe the building rather than vernacular which usually means a building built by local people using local materials without a formal design.
- Conservation Section welcomed the proposal to reinstate the building and concerns regarding height were recommended to be dealt with by Further Information, they did not recommend refusal.
- Conditions recommended by the Conservation Section are non-contentious and the Applicant would accept them.
- The proposal complies with HER20 and HER21 of the DLR CDP.
- Roebuck Grove House is not an "exemplar" of the 19th Century suburban-rural large house. Its setting has now been so irrevocably altered, and its condition has deteriorated to such an extent that it is difficult to make any economic case for its preservation. The building is damaged far beyond economical repair, and it will cost a multiple of normal building costs to reinstate it.



## 6.2. Planning Authority Response

The Planning Authority consider that the revised Option 2 put forward by the Applicant as part of the appeal would appear to satisfactorily address elements of the three reasons for refusal but that there would be remaining concerns regarding negative impacts on the adjacent dwellings to the south and a shortfall in quality of communal open space.

## 6.3. Observations

6.3.1. Observations have been received from the following third parties:

- Des and Vivian Hanrahan of 1 The Grove, Goatstown, Co. Dublin
- Karl Murray of 15 The Grove, Goatstown, Co. Dublin.
- Ryan Sherlock of 18 The Grove, Goatstown, Co. Dublin
- Adrian and Liza O'Connor of 20 The Grove, Goatstown, Co. Dublin.
- Fergus Bolger and Wendy Jennings of 22 The Grove, Goatstown, Co. Dublin
- Úna O'Shea, Roebuck Residents' Association.
- Our Lady's Grove Educational Campus c/o BPS Planning and Development Consultants

6.3.2. The main issues raised in the observations can be summarised as follows:

### 6.3.3. Location and Operation

- There is an overconcentration of similar facilities in the area contrary to Policy PHP32 of the CDP.
- No Needs Assessment has been undertaken as required under the Guidelines for Development of New Emergency Accommodation.
- The development is inappropriately located and lacking in proximity to services, shops, transport, and parks.
- Siting of the hostel beside a school campus is inappropriate, there is a lack of a credible operational management plan, access and security concerns, and

the scheme may create problems for how sporting and other facilities within the campus are used by local people and children.

- The development would be intended for single individuals and in that case it's likely the residents would be single males. This would be inappropriate, could lead to tensions/anti-social behaviour and is particularly troublesome in close proximity to a school campus.
- Providing accommodation to cater for a mix in circumstances (including couples with children) would be a better fit with the surrounding area of family homes and schools.
- There are contradictions in the Applicant's submission regarding the use of the hostel, including that it would be for temporary accommodation, for displaced persons, and that there may be variance in occupancy periods.
- The Applicant acknowledges that residents may be housed in the hostel for long periods, the shortfall in residential amenity standards would therefore not be justified.
- The information submitted with the application is insufficient and does not confirm who would run the hostel or how it would be operated/managed. There is no information on how the development would be managed and operated, staff numbers, or hours of operation.
- There is no provision for facility management such as an office, reception desk or other staff facilities.
- The proposal fails to achieve the type of hostel facility envisaged by the Dublin Region Homeless Executive or by the Guidelines for Development of New Emergency Accommodation.
- No areas of the development are set aside for communal facilities for residents/guests or for providing care in a private capacity.
- The proposal fails to comply with the Development Management Guidelines as the submission lacks clarity and transparency on whether these are short or long term units.

#### 6.3.4. Density

- The proposal fails to comply with PHP20, is excessive in scale, height, massing, and represents an overdevelopment of the site.
- The density is not appropriate having regard to the building of historic interest and wouldn't comply with Policy PHP18.
- Previous permission for this site approved a density of 50uph. The proposed density is excessive.
- It would be more appropriate to complete the site as originally approved by providing a small number of apartments, there is a pressing need for permanent and affordable housing in the area.
- The hostel could be expected to accommodate up to 60 people.

#### 6.3.5. Design and Heritage

- The development does not respect the scale, character or context of the local area and the height, scale and massing are excessive.
- A Height Compliance Report should have been submitted.
- The development is poor in terms of design, is not complimentary to the existing building, detracts from its appearance, and would be incongruous.
- Open space provision is insufficient. Residents would therefore use open space which belongs to The Grove.
- The proposal does not take into account the most recent planning permission for the site.
- The scheme is effectively a development of sub-standard studio apartments.
- The Emergency Guidelines note that shared open space must be provided.
- This is a scheme designed for a city centre location where the provision of open space might be more challenging, the deficient nature of the open space is unacceptable in this location.
- The proposal is more akin to shared/co-living than a hostel and such developments are no longer permitted.
- The quality of accommodation is poor, there is insufficient communal amenity space.

- Restoration does not override broader planning considerations and amenity impacts.
- The planning framework prioritises quality and appropriateness of development, not profitability for the developer. Financial viability arguments are not valid.
- Degradation of Roebuck Grove House has happened since the Applicant acquired the site. The previous owner had permission to convert the house into two apartments and were using the house as the main site office up until Covid.
- The scale of the proposal overwhelms the existing building, leaving it ancillary in appearance and failing to respect the context.
- Precedent examples provided by the Applicant are not comparable.

#### 6.3.6. Amenity

- The proposal would be overbearing on neighbouring properties and would result in overlooking, loss of privacy, and overshadowing.
- The development would be overbearing, there is no proposed buffer or stepback from adjacent homes.
- Siting of a hostel on a school campus is inappropriate. It is important that the campus remains a safe place for children.
- There would be a reduction in amenity to the schools with issues around shared spaces, potential increase in traffic and child safeguarding.
- The transient nature of the short-term accommodation will make the area less safe and impact the social cohesion of residents and children.
- There would be a negative impact on property values as demonstrated by evidence from the Netherlands.
- There would be disturbance during the construction phase.

#### 6.3.7. Transport

- Cycle parking facilities are outside the railings bordering the hostel and open out onto the footpath used by school children and is a right of way for local residents. This would also create additional footfall on this path.

- Car parking is insufficient and would lead to overspill parking.

#### 6.3.8. Other Matters

- There is no relevance in referencing quashed applications, particularly in reference to the proposed student accommodation.
- There has been no pre-application consultation.
- The proposal would contravene conditions of a previous planning permission. (D11A/0595).
- The amendments proposed by the Applicant are significant and require a new planning application with new notices and the opportunity for the public to make observations.
- There are mistakes on the drawings which do not properly illustrate the context of the site.
- There are inaccuracies on the blue line boundary and how it matches up to adjoining sites based on previous planning applications.

## 7.0 **Assessment**

7.1. In responding to the concerns of the Planning Authority, the Applicant has submitted an amended scheme for the Board to consider, should they not be satisfied with the originally submitted scheme. The proposed revisions include reducing the new build element in height by one storey and reducing the overall number of hostel bedrooms from 29 to 24. I do not consider the changes to be so significant, either alone or cumulatively, that they would represent a significant change, and I am satisfied that the amendments can be considered as part of the appeal. They will be addressed, where relevant, in my assessment below.

7.2. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues to be considered in this appeal are as follows:

- Location and Operation

- Density
- Design, and Heritage
- Residential Amenity
- Quality of Accommodation/Open Space
- Transport
- Other Matters

### **7.3. Location and Operation**

- 7.3.1. The core concern raised by observers is that the subject site is an inappropriate location for a hostel having regard to its proximity to schools and relative distance from services, shops, transport and public parks. It is stated that there would be a reduction in amenity to the schools and that the transient nature of the short-term accommodation would make the area less safe. It is argued that there is an overconcentration of similar facilities in the area, that no needs-based assessment has been undertaken, and that there is a risk of reduced safety and increased tensions/anti-social behaviour as the facility is likely to accommodate single males.
- 7.3.2. PHP32 of the CDP states that proposals for homeless accommodation should not result in an overconcentration in one area. I note that there are similar existing facilities at Mount St Mary's and the Central Mental Hospital. No catchment distance is given in policy in terms for considering the concentration of facilities in any specific area, however, I note that Mount St Mary's is c.1.16km to the north-west and the Central Mental Hospital site is c. 480 metres to the west. Whilst noting the relative proximity of the Central Mental Hospital, Mount St Mary's is a considerable distance away and on balance I do not consider that the proposal for a 29 bedroom hostel (or 24 on the amended appeal scheme) would lead to a significant overconcentration in the area.
- 7.3.3. Noting the lack of policy provision for this use in the CDP, regard is had to the Guidelines for the Development of New Emergency Accommodation (September 2022) which is referred to by all parties to the appeal. In terms of location, the guidance states that for all types of emergency accommodation (families and singles), preference should be for locations with easy access to public transport as well as to facilities such as shops, recreation, and centres of employment. In addition, for family accommodation, easy access to schools is also important. For ease of access to such

amenities, a limit of 1km or at the very most 1.5kms in well built-up areas, is considered preferable.

- 7.3.4. I am satisfied that the location is suitable having regard to the aforementioned guidance, being located within the recommended distances of shops, services and public transport. There is a small neighborhood centre approximately 220 metres from the site, Dundrum Town Centre is approximately 1.1km away and the UCD campus is also just over 1km away. The requirement for an assessment of demand, as set out in the Guidelines for the Development of New Emergency Accommodation, lies with the Planning Authority rather than the Applicant.
- 7.3.5. Concerns raised regarding potential anti-social behaviour and safety to the school are generally unfounded in my opinion, although I accept that the successful integration of the facility into the local area would largely be dependent on its appropriate operation and management. On this matter, concerns are raised by observers regarding a lack of information on how the hostel would be operated and managed, including details of staff numbers, hours of operation, lack of a credible operational management plan, access and security concerns. Observers also raise concerns regarding contradictions in the Applicant's submission and note that there may be variance in occupancy periods.
- 7.3.6. I share some of the concerns raised in the observations. The scheme is to provide temporary accommodation for displaced people who are at risk of homelessness however no general indication of occupancy period is given. Furthermore, no details have been provided on how the hostel would be operated and managed and no details of staff or staffing hours are given. Importantly, the Guidelines for the Development of New Emergency Accommodation clearly state that provision needs to be made for management facilities to accommodate the number of staff likely to be on duty at any time, noting that these facilities usually include a meeting room, manager's office and staff toilet. Neither the plans submitted with the application, or the revised plans submitted with the appeal make any provision for staff facilities. In this respect, the proposal would be contrary to the Guidelines and in my opinion should be refused on this basis.

#### 7.4. **Density**

- 7.4.1. It is stated in the observations that the proposal would be excessive in density, which is not appropriate having regard to the host building which is of historic interest and the previous planning permission which secured a density of 50uph on this site. Further concerns are that the height, scale and massing of the development would represent overdevelopment of the site, and that it would be more appropriate to provide a small number of apartments instead.
- 7.4.2. I note that the Planning Authority have applied the residential density standards to the development, equating the scheme with a density of c. 300uph. Whilst I understand why the Planning Authority have taken that approach, given the dearth of policy provision for the proposed hostel use and potential adjacencies with residential use, I would caution against this approach as non self-contained accommodation will lead to disproportionate density figures on a per unit basis. In my opinion, quantum of development in this case should be assessed on first principles regarding scale, massing, and impacts on adjacent properties which I will address in detail in the following sections of the report.

## **7.5. Design and Heritage**

- 7.5.1. The Planning Authority's first reason for refusal relates primarily to design and the impact of the development on Roebuck Grove House. The reason for refusal concludes that the strong design contrast and abrupt difference in height, coupled with its bulk, siting, proximity and massing of the new-build element to Roebuck Grove House would result in an unacceptable degree of negative impact upon its character and setting, and a discordant element when viewed on the streetscape.
- 7.5.2. In responding to the first reason for refusal, the Applicant contends that Roebuck Grove House has not been deemed worthy of Protected Structure status, and in noting the poor state of repair of the building, the Applicant asserts that new build accommodation is required to the rear in order to allow a viable development, having regard to the costs of retaining and refurbishing Roebuck Grove House. It is the Applicant's position that contemporary design should not be refused in order to preserve a partially collapsed ruin of a historic structure, and there are many examples of hybrid buildings incorporating historic fabric and contemporary architecture.
- 7.5.3. Observations on the appeal consider the development to be excessive in height, scale, and massing. The view is taken that a height compliance report should have been



submitted, and that the proposal would not be complementary to the existing building. It is the position of the observers that the restoration of Roebuck Grove House should not override other planning considerations, that the Applicant allowed the building to fall into disrepair, and that financial viability arguments are not valid.

7.5.4. Clearly, Roebuck Grove House is in a significant state of dereliction, and I agree with the Applicant that a suitable redevelopment would enable the retention and refurbishment of the building, subject to being of an appropriate scale and design. In terms of the scheme originally submitted at planning stage (four storeys above lower ground/29 no. hostel rooms), I would advise the Board that I agree entirely with the Planning Authority's conclusion with regard to the excessive scale, massing, and bulk of the proposal and its discordant relationship with the host building.

7.5.5. However, I consider that the amended scheme submitted with the appeal largely overcomes these concerns. The amendments proposed as part of the appeal reduce the height of the rear extension to three storeys above lower ground and reduces the number of hostel bedrooms from 29 to 24. In my opinion, the scale now being proposed is now more respectful of and proportionate to Roebuck Grove House when viewed front on from The Grove. Whilst I accept that the amended development would still be taller than Roebuck Grove House, it would not be so tall that it would overwhelm or dominate the host building. I consider the design approach and architectural response to be acceptable and an appropriate contrast between old and new would be achieved, allowing them to be read distinctly. The successful integration of the extension will be dependant on the quality of materials which I recommend the Board should condition in the event that permission is granted.

## **7.6. Residential Amenity**

7.6.1. The Planning Authority's second reason for refusal relates to residential amenity impacts, concluding that the bulk, siting, proximity and massing of the new-build element would result in a visually obtrusive, dominant and overbearing development as viewed from the rear amenity and front curtilage areas of the adjacent row of dwellings.

7.6.2. The Applicant contends that the height is not excessive when compared to the adjacent homes and that the proposal would not have a negative impact on residential amenity in terms of daylight/sunlight or overlooking/privacy. The Applicant considers

that greater heights have been approved by the Board in the area, that the site is underutilised and that lower density dwellings should not dictate the future form of development in the area, particularly with regard to the location relative to public transport, shops, services, schools and third level institutions. The Applicant asserts that the development would not be overbearing or visually dominant and would be an appropriate massing in its receiving context.

- 7.6.3. Observers maintain that the proposal would be overbearing on neighbouring properties and that it would result in overlooking, loss of privacy, overshadowing, and disturbance during construction. It is a concern of the observers that property values would be negatively affected.

#### *Overbearance*

- 7.6.4. In terms of the scheme originally submitted at planning stage, I concur with the assessment of the Planning Authority that it would be overbearing on the adjacent dwelling to the south. Whilst I am satisfied that the amendments submitted as part of the appeal have satisfactorily addressed the relationship of the new build element to the existing Roebuck Grove House, I do not take the view that the amendments have suitably addressed concerns with regards to the relationship with the adjacent dwelling.

- 7.6.5. The new build rear extension to Roebuck Grove House would sit immediately adjacent to the rear garden ground of No. 22 The Grove. This new build element would largely extend for the depth of this boundary in a 'saw-tooth' plan form. It would be positioned just 1.9 metres from the boundary at its closest point, and would measure 10.6 metres in height from the ground level of the garden at No. 22. I have considered the setbacks provided by the 'saw-tooth' plan profile, however the beneficial effect of this is limited and overall, I am of the view that the development would still be overbearing on the neighbouring property at No. 22 and that it would have an injurious impact on residential amenity.

#### *Overlooking and Loss of Privacy*

- 7.6.6. The development, both originally submitted and as amended at appeal stage, has been designed such that there would be no direct overlooking of any adjacent properties or garden ground. I therefore find that there would be no adverse impacts on these grounds.

### *Overshadowing*

- 7.6.7. The development site sits to the north of the adjacent residential properties and as such I consider that there would be no detrimental effects in terms of a loss of daylight, sunlight or overshadowing. I have considered the Applicant's Daylight and Sunlight Assessment that confirms that the nearest dwellings and amenity spaces would remain BRE compliant, and I am fully satisfied that there would be no significant impacts in this regard.

### *Disturbance During Construction*

- 7.6.8. All construction projects result in a degree of disturbance during the construction phase. In many respects a certain level of disturbance is inevitable in order to facilitate development. However, I do not consider that the level of disturbance associated with a project of this size would be to such a degree that it would seriously injure residential amenity or the amenity of the adjacent schools, and I am satisfied that construction disturbance could be suitably managed and mitigated through the implementation of a Construction Management Plan which should be secured by condition in the event that the Board grant permission.

### *Property Values*

- 7.6.9. I note the concerns raised in the observations in respect of the devaluation of neighbouring property. However, having regard to the assessment and conclusion set out above, I am satisfied that the proposed development would not seriously injure the amenities of the area to such an extent that would adversely affect the value of property in the vicinity.

## **7.7. Quality of Accommodation/Open Space**

- 7.7.1. The Planning Authority's third reason for refusal relates to communal open space and the Planning Authority's view that the proposal represents a significant shortfall for the proposed use that would result in an unacceptable level of residential amenity and be contrary to the provisions of the Guidelines for Development of New Emergency Accommodation' (DoPHLG, 2022).
- 7.7.2. Observers echo this point and consider that the quality of accommodation would be poor. It is stated in the observations that this is a scheme designed for a city centre location where the provision of open space might be more challenging, and that the

deficient nature of the open space is unacceptable in this location and that residents would use open space which belongs to The Grove

- 7.7.3. The Applicant raises concerns with the methodology used by the Planning Authority in assessing this issue, contending that an aparthotel is a different use with different end user requirements and that comparing the scheme with studio apartments is not appropriate, concluding that the statutory plan does not require communal open space for hostel use and as such communal open space standards do not apply.
- 7.7.4. The grounds of appeal note that the Guidelines for the Development of New Emergency Accommodation state that access to a shared open space or garden or convenience to a public park should be considered and acknowledges that a dedicated private open space may be difficult to provide but where possible, some provision of open space, shared but private to residents, should be provided. The Applicant states that the development has clearly considered the provision of communal open space, with 70sqm provided and notes that the development is close to Rosemount Green which is approximately 600 metres away.
- 7.7.5. The Emergency Accommodation Guidelines state that the provision of private open spaces in emergency temporary accommodation is not envisaged, but access to a shared open space or garden or convenience to a public park should be considered particularly for family type accommodation. I note that 70sqm of amenity space is provided and that there are other amenity spaces nearby, such as Rosemount Green as referred to by the Applicant. On balance, I accept that full provision to residential standards is not explicitly required for developments of this nature. However, in my opinion, the amenity spaces are small and relatively constrained. This is a particular concern with the amenity space located immediately adjacent to the boundary with No. 22., where it is largely sandwiched between the building and the property boundary.
- 7.7.6. The plans indicate 8 single bedroom units and 16 double bedroom units. No information is provided on occupancy but based on the layouts the scheme could reasonably accommodate between 24 and 40 people. This is a significant number of people to make use of the two amenity spaces provided and, in my mind, the use of the amenity space adjacent to No. 22 could reasonably impact on its rear garden space in terms of disturbance, as there would be significant pressure on the facility's

amenity space. I therefore find that the size, location, and layout of the amenity spaces proposed could result in an injurious impact on the residential amenity of the adjacent dwelling.

## **7.8. Transport**

- 7.8.1. It is stated in the observations that the development would lead to increased traffic, reduced safety, and overspill parking due to low parking provision. Further concerns are raised regarding the location of the cycle parking on the basis that it is outside the railings bordering the hostel, opening out onto a footpath which is a right of way for local people and used by school children. It is also stated that the location of the cycle parking would create additional footfall on this path.
- 7.8.2. The site is served by a range of bus services. Dublin Bus 11 is within 300 metres of the site, services 44 and 44D are within 1km and the S6 is available from Taney Avenue c.1.1km to the south. Three car parking spaces are provided, inclusive of an accessible bay, in addition to two motorcycle spaces. Given the nature of the use in addition to the proximity of public transport, I am of the opinion that the level of car parking being provided is acceptable on balance and I do not share the concerns of the observers with regards to the risk of overspill car parking or the risk of increased traffic/reduced safety, noting also that the Council's Transportation Planning Division raised no objections to the development.
- 7.8.3. In terms of cycle parking, eight spaces in addition to two cargo bike spaces are provided to the front of Roebuck Grove House. Whilst the quantum and location of the cycle parking are acceptable, in my opinion, the Applicant might reasonably have taken the opportunity to provide increased cycle parking in addition to more secure storage within the site, however I am satisfied that this could be addressed by condition should the Board grant permission. I do not agree with the concerns raised by observers with regards to the cycle parking conflicting with a right of way and use of the footpath as the proposed relationship/provision is a common arrangement in urban areas.

## **7.9. Other Matters**

- 7.9.1. Observations made on the appeal state concerns that no pre-application consultation took place and that the amendments proposed by the Applicant are significant and require a new planning application with new notices and the opportunity for the public

to make observations. Pre-application consultation is not a mandatory requirement for an application of this nature. In terms of the amendments made as part of the appeal I do not consider them to be material, the size of the building would be reducing, it would not change significantly in terms of its design, and potential amenity impacts would not be intensified. I am therefore satisfied that the amendments can be considered by the Board.

- 7.9.2. I note concerns raised by the observers with regards to inaccuracies on the submitted drawings and concerns raised by both the observers and the Planning Authority regarding the accuracy of the blue line plan. In my view the issue of the blue line is minor and could be addressed by way of Further Information should the Board grant permission. With regards to the other issue raised with the drawings, I am satisfied that there is sufficient information on the elevations and the plans in order to assess the appropriateness of the development and its contextual relationship to neighbours.

## **8.0 AA Screening**

### **8.1. Stage 1 – Screening Determination for Appropriate Assessment**

- 8.1.1. The Applicant has submitted an Appropriate Assessment Screening Report. The Board should note that the site is not within or immediately adjacent to any European sites.
- 8.1.2. I conclude that that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects. It is therefore determined that Appropriate Assessment (stage 2) [under Section 177V of the Planning and Development Act 2000] is not required.
- 8.1.3. This conclusion is based on:
- Objective information presented in the Appropriate Assessment Screening Report (dated February 2024).
  - The limited zone of influence of potential impacts, restricted to the immediate vicinity of the proposed development.
  - Standard pollution controls that would be employed regardless of proximity to a European site and effectiveness of same.

- Qualifying interests, special conservation interests, and conservation objectives of the European sites.
- Distances from relevant European Sites.
- The absence of any significant or meaningful pathway to any European site.

8.1.4. No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.

## **9.0 Recommendation**

9.1.1. I recommend that the Board uphold the decision of Dún Laoghaire-Rathdown County Council and refuse planning permission for the following reasons:

## **10.0 Reasons and Considerations**

1. The bulk, siting, proximity and massing of the new-build element to the adjacent dwelling to the south would result in a visually obtrusive, dominant and overbearing form of development when viewed from the rear garden amenity space, seriously injuring the residential and visual amenities of the adjacent property. Furthermore, the constrained size, location, and layout of the proposed amenity spaces would fail to provide an acceptable standard of amenity for future occupiers and would lead to an injurious impact on the residential amenity of the neighbouring rear garden ground in terms of disturbance. The development would therefore be contrary to the proper planning and sustainable development of the area.
2. Having regard to the lack of provision of appropriate facilities for staff in the daily operation of the proposed facility, it is considered that the development would fail to comply with the Guidelines for New Emergency Accommodation (DoHLGH 2022). The development would, therefore, be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

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Terence McLellan  
Senior Planning Inspector

31<sup>st</sup> March 2025





# Appendix 1

## AA Screening Determination Test for likely significant effects

### Screening for Appropriate Assessment Test for likely significant effects

#### Step 1: Description of the project and local site characteristics

<b>Brief description of project</b>	<p>The repair, restoration, and refurbishment of Roebuck Grove House, incorporating a four storey extension over lower ground level to provide a 29 bedroom hostel for displaced persons. The accommodation would include shared kitchen, dining/lounge, and laundry facilities. Three car parking spaces would be provided, inclusive of an accessible bay, in addition to two motorcycle spaces and 10 cycle parking spaces.</p>
<b>Brief description of development site characteristics and potential impact mechanisms</b>	<p>The appeal site refers to Roebuck Grove House and grounds, located at Our Lady's Grove, Goatstown Road, Roebuck, Dublin 14. The site measures c.0.0967 hectares and is regularly shaped.</p> <p>The site is located within a fairly new residential area known as The Grove which is accessed from Goatstown Road. The residential estate comprises five storey apartments fronting onto Goatstown Road and a mixture of two and a half storey terraced dwellings and three storey duplexes.</p> <p>There are no watercourses in, immediately adjacent to, or within 300 metres of the site. Impact mechanisms would therefore be limited to surface water drainage, which would make use of the existing drainage system which is part private part public system.</p>

<b>Screening report</b>	Appropriate Assessment Screening Report – Malone O'Regan Environmental (February 2024).
<b>Natura Impact Statement</b>	No.
<b>Relevant submissions</b>	None.

## Step 2. Identification of relevant European sites using the Source-pathway-receptor model

The Applicant has considered all European sites within a 15km radius. In my opinion, the relevant European sites pertaining to the development are set out below.

European Site (code)	Qualifying interests <sup>1</sup> Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections <sup>2</sup>	Consider further in screening <sup>3</sup> Y/N
South Dublin Bay and River Tolka Estuary SPA 004024	A046 Brent Goose <i>Branta bernicla hrota</i> A130 Oystercatcher <i>Haematopus ostralegus</i> A137 Ringed Plover <i>Charadrius hiaticula</i> A141 Grey Plover <i>Pluvialis squatarola</i> A143 Knot <i>Calidris canutus</i> A144 Sanderling <i>Calidris alba</i> A149 Dunlin <i>Calidris alpina alpina</i> A157 Bar-tailed Godwit <i>Limosa lapponica</i> A162 Redshank <i>Tringa totanus</i> A179 Black-headed Gull <i>Chroicocephalus ridibundus</i> A192 Roseate Tern <i>Sterna dougallii</i> A193 Common Tern <i>Sterna hirundo</i> A194 Arctic Tern <i>Sterna paradisaea</i> A999 Wetlands	2.7km	Indirect via the drainage system.	N

	<p>All conservation objectives are to maintain the favourable conservation condition of the QI's, with the exception of Grey Plover which is proposed for removal from the list of Special Conservation Interests for South Dublin Bay and River Tolka Estuary SPA.</p> <p><a href="#">ConservationObjectives.rdl</a></p>			
South Dublin Bay SAC 000210	<p>1140 Mudflats and sandflats not covered by seawater at low tide.</p> <p>To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in South Dublin Bay SAC.</p> <p><a href="https://npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000210.pdf">https://npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000210.pdf</a></p>	2.7km	Indirect via the drainage system.	N

<sup>1</sup> Summary description / **cross reference to NPWS website** is acceptable at this stage in the report

<sup>2</sup> Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species

<sup>3</sup>if no connections: N

### Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

#### AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
<p><b>Site 1:</b> South Dublin Bay and River Tolka Estuary 004024</p> <p>QI list</p> <p>A046 Brent Goose <i>Branta bernicla hrota</i></p>	Potential impacts on water quality due to surface water and foul water discharge.	No effects anticipated, existing drainage systems would be used in addition to standard measures.

A130 Oystercatcher <i>Haematopus ostralegus</i>  A137 Ringed Plover <i>Charadrius hiaticula</i>  A141 Grey Plover <i>Pluvialis squatarola</i>  A143 Knot <i>Calidris</i> <i>canutus</i>  A144 Sanderling <i>Calidris</i> <i>alba</i>  A149 Dunlin <i>Calidris</i> <i>alpina alpina</i>  A157 Bar-tailed Godwit <i>Limosa lapponica</i>  A162 Redshank <i>Tringa</i> <i>totanus</i>  A179 Black-headed Gull <i>Chroicocephalus</i> <i>ridibundus</i>  A192 Roseate Tern <i>Sterna dougallii</i>  A193 Common Tern <i>Sterna hirundo</i>  A194 Arctic Tern <i>Sterna</i> <i>paradisaea</i>  A999 Wetlands		
	<b>Likelihood of significant effects from proposed development (alone):</b> <b>No.</b>	
	<b>If No, is there likelihood of significant effects occurring in combination with other plans or projects?</b> <b>No.</b>	
	<b>Possibility of significant effects (alone) in view of the conservation objectives of the site*</b> <b>No.</b>	

	Impacts	Effects
<b>Site 2:</b> South Dublin Bay SAC - 000210  QI list  1140 Mudflats and sandflats not covered by seawater at low tide.	Potential impacts on water quality due to surface water and foul water discharge.	No effects anticipated, existing drainage systems would be used in addition to standard measures.
	<b>Likelihood of significant effects from proposed development (alone)?</b>  <b>No.</b>	
	<b>If No, is there likelihood of significant effects occurring in combination with other plans or projects?</b>  <b>No.</b>	
<b>Step 4 Conclude if the proposed development could result in likely significant effects on a European site</b>		
I conclude that the proposed development (alone) would not result in likely significant effects on the South Dublin Bay and River Tolka Estuary SPA and the South Dublin Bay SAC. The proposed development would have no likely significant effect in combination with other plans and projects on any European site. No further assessment is required for the project. No mitigation measures are required to come to these conclusions.		

## Appendix 2 Form 1

### EIA Pre-Screening

<b>An Bord Pleanála</b>	ABP-319774-24		
<b>Case Reference</b>			
<b>Proposed Development Summary</b>	Development consisting of repair, restoration and refurbishment of the derelict Roebuck Grove House for the construction of a four-storey extension to provide a 29 bedroom hostel and all associated site works.		
<b>Development Address</b>	Site at Roebuck Grove House, Our Lady's Grove, Goatstown Road, Dublin 14, D14 X9T3		
<b>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</b> (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	<input checked="" type="checkbox"/>
		No	
<b>2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)?</b>			
Yes	<input checked="" type="checkbox"/>	Class 10 (b) (iv) – Infrastructure Projects.	Proceed to Q3.
No			
<b>3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?</b>			
Yes			

No	✓		Proceed to Q4
<b>4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?</b>			
Yes	✓	Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. The subject site has an area of 0.0967 hectares.	Preliminary examination required (Form 2)

<b>5. Has Schedule 7A information been submitted?</b>		
No	✓	<b>Pre-screening determination conclusion remains as above (Q1 to Q4)</b>
Yes		<b>Screening Determination required</b>

Inspector: \_\_\_\_\_

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



## Appendix 3

### Form 2

#### EIA Preliminary Examination

<b>An Bord Pleanála Case Reference</b>	<b>ABP- 319774-24</b>
<b>Proposed Development Summary</b>	Development consisting of repair, restoration and refurbishment of the derelict Roebuck Grove House for the construction of a four-storey extension to provide a 29 bedroom hostel and all associated site works.
<b>Development Address</b>	Site at Roebuck Grove House, Our Lady's Grove, Goatstown Road, Dublin 14, D14 X9T3
<b>The Board carried out a preliminary examination [ref. Art. 109(2)(a), Planning and Development regulations 2001, as amended] of at least the nature, size or location of the proposed development, having regard to the criteria set out in Schedule 7 of the Regulations.</b> <b>This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.</b>	
<b>Characteristics of proposed development</b> (In particular, the size, design, cumulation with existing/proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	<p>The proposed development would provide temporary accommodation in a built up urban area. The scale of the development is not significant in the context of the surrounding built form or character and would not be considered to result in significant environmental effects.</p> <p>Demolition works would be small scale, related to the existing building, which would largely be retained and refurbished. Construction materials and activities would be typical for an urban development of this nature and scale.</p> <p>The use of fuels and materials would be typical for construction</p>

	<p>sites. Construction impacts would be local and temporary in nature, and could be suitably managed through a Construction Environmental Management Plan.</p> <p>In terms of accidents, no significant risk is anticipated having regard to the nature and scale of the development. Any risk arising from demolition and construction will be localised and temporary in nature.</p> <p>No existing or permitted developments have been identified in the immediate vicinity that would give rise to significant cumulative environmental effects with the subject project, including the student housing scheme that is currently subject to judicial review.</p>
<p><b>Location of development</b></p> <p>(The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).</p>	<p>The site is located in a built up urban area on zoned and serviced land. Development would be acceptable in land use terms and there would be no significant impact on any protected areas, protected views, built or natural heritage or European Sites.</p>
<p><b>Types and characteristics of potential impacts</b></p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>All development has the potential for some impacts/disturbance during the construction phase such as noise, vibration, dust, air quality and traffic. However, these impacts would be localised, short term and temporary and could be appropriately managed</p>

		and mitigated by way of conditions and the implementation of a detailed Construction Environmental Management Plan.
<b>Conclusion</b>		
<b>Likelihood of Significant Effects</b>	<b>Conclusion in respect of EIA</b>	
There is no real likelihood of significant effects on the environment.	EIA is not required.	

**Inspector:**

**Date:**

**DP/ADP:** \_\_\_\_\_

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

(only where Schedule 7A information or EIAR required)