



An
Coimisiún
Pleanála

Inspector's Report PL-501225-DS-26

Development

Change of use in two disused residential units, and semi-derelict outbuilding, to a primary school for children with additional needs and ancillary site development works.

Location

The Lower House, Gonzaga College, Sandford Road, Ranelagh, Dublin 6, D06 X8W3

Planning Authority

Dublin City Council South

Planning Authority Reg. Ref.

WEB5857/25

Applicant(s)

The Gonzaga College Trust

Type of Application

Permission

Planning Authority Decision

Grant Permission + Conditions

Type of Appeal

Third Party Normal Planning Appeal

Appellant(s)

Antoinette Assaf

Observer(s)

Ann Kerr

Date of Site Inspection

6th August 2026

Inspector

Patricia Byrne

1.0 Site Location and Description

- 1.1.** The appeal site is located within the Gonzaga College campus, Sandford Road, Ranelagh Dublin 6. Gonzaga College is a boy's post-primary school and also a Jesuit residence. The educational complex, which has a campus style layout, also contains extensive sporting pitches and amenities.
- 1.2.** Primary access, both vehicular and pedestrian, is off Sandford Close.
- 1.3.** The appeal site is located to the north-west of the campus and contains a cluster of buildings grouped around a small courtyard which contains a mature tree. A two-storey structure is located to the north, currently in use as a store on both floors. A three-storey building, with flat-roofed, single-storey extension to its eastern elevation lies to the west. This structure was in previous residential use, containing flats. A further single storey structure located to the east comprises a gardening store and WC, while a detached single storey hipped-roof building to the southeast is described as a cricket changing pavilion.
- 1.4.** Cumulatively, the structures extend to a stated floor area of 869sq.m. Structures retained on extend to 87sq.m. Fire damage has occurred to the northwestern block, with the roof removed. Overall, the buildings are in varying states of repair.
- 1.5.** A fenced bowling enclosure and cricket grounds lie to the south of the single storey building, while to the south-west is a vehicular circulation area with informal parking and bin storage. Access roads lead to the wider college campus and school buildings. Further to the south and east lies a large expanse of open space with specimen trees, while an enclosed garden is located immediately east of the site.
- 1.6.** A block boundary wall and a row of Leyland conifer trees (which have been lopped) lie to the west, beyond which are residential properties fronting Park Drive. The eastern elevation of a barrel-roofed mews property abuts the three-storey structure, while to the north, the site is bounded by dwelling houses and attendant grounds of dwellings facing Albany Road.
- 1.7.** The stated area of the site is 0.183Ha.

2.0 Proposed Development

2.1. The proposal concerns the development of a specialist primary school for boys and girls aged between 4-12. The school, St. Declan's, has operated from No. 35 Northumberland Road since 1958, with this premises stated to be no longer fit for purpose. The school is described as providing a secure, safe and supportive learning environment for children with emotional and behavioural difficulties, assisting them to return to mainstream school. Attendance can be for one, two or more years.

2.2. The development as described in the public notices is summarised as follows:

- Reconfiguration of the three-storey pitched roof building, extending its floor area from 139sq.m to 328sq.m. The building height would increase by a stated 1.9m.
- Reconfiguration of the two-storey structure to the northern boundary, increasing the floor area from 134sq.m. to 148sq.m. and increase in height by 1.51m.
- Demolition of single storey outbuildings and WC block (56sq.m) and replacement with a two-storey building 6.71m in height and 72sq.m in area.
- Construction of a three, two and single storey covered walkway to the inner side of the courtyard to its western, northern and eastern sides, accessing all levels and connecting to an open staircase and an enclosed staircase/lift.
- Construction of a mono-pitched single storey extension to the southwest with a floor area of 175sq.m. with a maximum height of 6.25m reducing to 4.12m.
- Reconfiguration and extension of the single storey pavilion extending from 87sq.m. to 112sq.m in floor area.
- Provision of gates and play space within the courtyard and part of the adjoining walled garden shared with Gonzaga College.

2.3. The gross internal floor area of the development (excluding open walkways) extends to a stated 869sq.m. The school would have a student population of 50 no. with 22 no. staff. The facility contains 7 no. classrooms (each with accessible bathroom); quiet spaces, sensory rooms, library, reading room, multi-purpose room, administrative offices, staff areas, secretary and principal's room. The refurbished pavilion building and sliding gate to the courtyard forms the primary access and hub of the school complex.

- 2.4.** Access to the school will be via the main entrance to Gonzaga College from Sandford Road. Students travel to and from the school via minibus, and 9 no. drop off spaces are to be provided. A maximum of 4-5 no. children will arrive by car, with the number varying yearly. 6 no. staff parking spaces (including an accessible space) and 8 no. bicycle spaces are proposed.
- 2.5.** The development connects to existing public services, including public water and mains sewage. Surface water from impermeable roof and hardstanding areas will be collected in a new detention basin to the eastern end of the school garden, designed as both interception and attenuation storage. Outflow will be controlled by Hydrobrake, with discharge to the existing campus manhole south of an Uisce Éireann (UE) manhole in Merton Drive. Note: The attenuation pond and access roads (including passing bay) are shown outside the red line boundary of the application site, but are contained within the overall blue line boundary.
- 2.6.** Supporting documents at application stage included the following:
- Daylight & Sunlight Analysis and Overshadowing
 - Architectural Visualisation (Verified Views)
 - Architectural Design Report
 - Architectural Design Statement
 - Appropriate Assessment screening report
 - Ecological Impact Assessment report
 - Bat Survey
 - Archaeological Impact Assessment
 - Outline Construction Waste & Environmental Management Plan
 - Climate Action Statement
- 2.7.** Following a request for Further Information, revised plans and other particulars were lodged on the 2nd of March 2026. The amendments relate primarily to the road layout, indicating an increase in width from 3.25m to 3.7m to accommodate fire tender access. The response also confirms the provision of 6 no. car parking spaces for staff (located to the south of the pavilion building and a further space to the southwest).
- 2.8.** A Historic Building Survey was conducted, concluding that Buildings 1 and 2 are the earliest on site, dating from the mid-nineteenth century. The structures were found to be of no architectural, archaeological or historical significance or merit, having had a

range of functions relating to the small estate at Sandford Hill. A timber staircase in Building 1 and infilled fireplace in Building 2 are original features, and the planning authority requires under Condition No.7 (a) the submission of a historic building fabric salvage and reuse strategy for the storage and reuse of these features.

3.0 Planning Authority Decision

3.1. Decision

The planning authority, in considering the application, sought further information in relation to the following:

1. Widening of the internal access road to accommodate fire tenders and confirmation of total car parking spaces.
2. Requirement for a Historic Building Survey.

Dublin City Council by Order dated 27th March 2026, granted permission for the development subject to 11 no. conditions. The following in particular are noted.

Condition No. 3

The fenestration serving the north elevation of Classroom 6 on the second floor shall be permanently obscure glazed to a minimum of 1.8m high as measured from finished floor level.

Condition No.4

Prior to the erection of the external materials, the developer shall submit details of the final proposed materials and finishes to the building, including illumination/lighting details, for the written approval of the Planning Authority.

Condition No. 5

a) Prior to commencement of development, and on appointment of a main contractor, a Construction Management Plan (CMP) shall be submitted to the planning authority for written agreement. This plan shall provide details of intended construction practice for the development, including traffic management, hours of working, noise and dust management measures and off-site disposal of construction/demolition waste. The CMP shall take cognisance of the presence of the school and shall seek to minimise and prevent where possible construction traffic movements at school arrival and departure times. The appointed contractor shall liaise with DCC Road Works Control Division during construction period.

Condition No. 7

The Applicant shall comply with the following Archaeology requirements of the Planning Authority:

(a) Prior to commencement, the Applicant shall submit an historic building fabric salvage and reuse strategy to the Planning Authority for written agreement. This shall strategy to include details for the disassembling, storage and reuse of the 19th century timber staircase in Building 1 and the infilled fireplace in Building 2 (as identified in the AI report by Walsh dated February 2026).

(b) The agreed strategy shall be implemented in full by the Applicant and a report by a suitably qualified heritage professional submitted for approval of the planning authority prior to occupation of the new development...

3.2. Planning Authority Reports

3.2.1. Planning Reports

The initial planning report dated 3rd of February 2026, culminated in a request for Further Information. The salient matters raised are set out below:

- Proposal is permissible under the Z1 and Z15 land use zoning objectives.
- Scheme is consistent with existing on-site structures and with the wider surroundings in terms of height, massing and scale.

- Daylight Analysis and Overshadowing study considered acceptable.
- Fenestration to the northern elevation of classroom 6 to be fitted with obscured glazing.
- Reference to the reports of the Transport Planning Division and the Archaeological Section.
- No onus to retain existing boundary materials as part of the proposal.

Planning report following response to Further Information

A further report, dated 23rd of March 2026, prepared following the response to Further Information request refers to the following:

- Response not deemed significant and did not necessitate revised public notices under Article 35 of the Planning and Development Regulations 2001, as amended.
- Revised drawings, infrastructure report and particulars amend the roadway in order to cater for fire tenders.
- Clarity provided in relation to car parking spaces.
- Historic Building Survey concludes there is no impact on architectural heritage.
- Compliance demonstrated with policies and objectives of the Dublin City Development Plan 2022-2028.
- Recommendation to grant permission, subject to conditions. The recommendation and conditions are broadly reflective of the decision of the planning authority.

3.2.2. Other Technical Reports

Engineering Department- Drainage Division

Report dated 11th of December 2025:

- No objection subject to standard conditions.

Drainage Division report dated the 19th of March 2026 complied following submission of Further Information repeats the conditions of the initial report.

Transportation Planning Division

Initial report dated the 8th of January 2026 is summarised as follows:

- Width of internal access road at 3.25m is below minimum clearance for a fire tender and a width of c.3.7m is generally required.
- Further Information required to demonstrate access arrangements, sufficient carriage way width or other compliance with fire service requirements.
- Omission of long-term cycling parking provision is acceptable given students arrive/leave primarily by minibus.
- Requirement for 4 no. long term cycle parking spaces. 8 no. spaces in the form of Sheffield stands acceptable.
- Site is located within Area 2 Map J of the Development Plan (Parking Areas) 7 no. classrooms require a maximum of 7no. car parking spaces.
- 5 no. spaces equating to a ratio of 0.71 remaining within the maximum is acceptable.
- Discrepancy between stated car parking and spaces shown on submitted plans.
- Deliveries will be undertaken outside AM and PM peak school hours as per the Outline Construction, Waste and Environmental Management Plan. Scheduling to be reviewed as part of a final plan.
- Recommendation for Further Information in order to address fire tender access and to clarify car parking spaces.

A further report from the Division dated 12th of March 2026 records the following:

- Revised Drawings and Infrastructure Report provided.
- Roadway extended to 3.7m to allow for fire tender access.
- Swept path analysis conducted for fire tender access/egress and for refuse vehicles using the proposed hammerhead.
- A passing lay-by will allow cars to pass.
- 6 no. staff parking spaces, including an accessible space are detailed. A further space is located to the west, separate from bays 1-5.
- Recommendation to grant permission, subject to conditions.

Archaeology, Conservation and Heritage

Initial report dated 19th of January 2026 culminates in a request for Further Information. The matters raised are summarised below:

- Site is outside the Zone of Archaeological Constraint for Recorded Monument (RMP) DU018-020 Historic City and for (RMP) DU022-081 Site of the Battle of Rathmines. The larger site is partially within the zone of constraint for the latter.
- Objective BHA6 Buildings on Historic Maps indicates a presumption against demolition or substantial loss of any building/structure which appears on historic maps, up to and including OS of Dublin City 1847.
- Section 15.15.1.11 Buildings on the first edition OS which are not protected structures shall be recorded as part of an archaeological assessment.
- The Archaeological Desktop Assessment does not contain a historic building survey of buildings to be demolished. The history and date of the building to the northern boundary is not fully understood and the record is incomplete.

A further report dated the 19th of March 2026 was compiled following submission of Further Information:

- *'Building Survey at Site of proposed development for St Declan's School Gonzaga College Dublin 6'* provides building survey results including written, cartographic and photographic surveys, together with plans and elevations.
- Buildings 1 & 2 date from the mid-nineteenth century.
- Apart from the timber staircase in Building 1 and infilled fireplace in Building 2, neither building retains original internal features and fittings.
- Demolition of sheds and adaptation of buildings will not impact architectural heritage.
- Recommendation to grant permission subject to conditions, including a salvage strategy for disassembling, storing and reuse of staircase and infilled fireplace.

3.3. Prescribed Bodies

None on file

3.4. Third Party Observations

Matters raised in Third Party Observations are summarised as follows:

- Support expressed in principle for the proposal.
- Overdevelopment, overbearance and inappropriate scale and height impact residential amenities and property value.
- Loss of light, overshadowing and overlooking impacts.
- Proximity to third party boundaries and loss of boundary planting.
- Development is visually obtrusive.
- Day light assessment should reflect ground levels of neighbouring sites. Images are out of date and do not reflect recent constructions.
- Omission of separation distances from plans lodged. Structures omitted from light assessment/drawings.
- Breach of building line
- Design amendments required and revised locations sought for service equipment in order to protect amenities.
- Details required in relation external elevations forming boundaries with adjoining property. Preservation of granite stone wall sought.
- Windows to be fitted with appropriate glazing to prevent overlooking.
- Land Use Zoning concerns.
- Detrimental to Z2 Residential Conservation area zoning.
- Layout and siting are poorly conceived and are contrary to policies and objectives of Dublin City Development Plan.
- Description of development within public notices is misleading. Scale of demolition not clearly conveyed.
- Unclear rationale and justification to support the chosen location when alternatives are available.
- Disruption during construction.
- Scheme should not prejudice development on adjoining sites.

4.0 Planning History

4.1. Appeal Site

No planning history relates to the buildings forming part of the appeal site.

Wider Gonzaga College Campus

P.A. Reg. Ref. Web 2190/24 Permission GRANTED for internal reconfiguration and renovation of a two-storey science block and construction of three-storey extension with rooftop observatory, all accommodating a new Science, Technology, Engineering, Arts and Mathematics (STEAM) facility and associated works.

ABP-304727 / P.A. Reg Ref 1065/19 Permission GRANTED for 3g artificial turf pitch over the site of an existing natural grass pitch with associated works.

P.A. Reg. Ref. 2986/07 Permission GRANTED for 6no. temporary prefabricated classrooms and covered walkway.

ABP PL29S.215261 P.A. Reg. Ref. 4739/05 Permission GRANTED for an extension to the existing college of 3909sq.m. comprising two-storey lecture theatre, projection room, dining hall, 11no. classrooms, 2no. kitchens and associated works.

P.A. Reg. Ref. 0162/22 Declaration under Section 5 of the Planning and Development Act 2000, as amended, determining a 3m wide cycle/footpath link within the grounds of Milltown Park to be exempted development.

5.0 Policy Context

5.1. National Guidance

National Planning Framework- First Revision April 2025

Shared Goals—Our National Strategic Outcomes includes—Access to Quality Childcare, Education and Health Services. Section 6.5 Refers to Childcare, Education and Lifelong Learning, recognising the provision of appropriate school places for children with special educational needs. There is a requirement to ensure greater availability of appropriate placements in local areas, driven by the increased prevalence of special educational needs, in particular, of special class places and expansion in the network of special schools.

5.2. Dublin City Development Plan 2022-2028

- 5.2.1. The Dublin City Development Plan 202-2028 is the operational Development Plan for Dublin City and came into effect on the 14th of December 2022.

Volume 1 Written Statement

Chapter 4: Shape and Structure of the City

Policy SC11 Compact Growth

Chapter 5: Quality Housing and Sustainable Neighbourhoods

Section 5.5.8 Social and Community Infrastructure

Schools and Education

The Council seek to encourage innovative school design which provides for the efficient use of urban lands, and which embraces sustainable mobility management. School typologies that contribute to the identity of a neighbourhood, and which include adequate play, sport and recreational amenities will be promoted. The efficient use of lands will be encouraged through the development of new urban typologies of school building design which should have regard to the requirements set out by the DES Schools' Design Guidelines.

Policy QHSN54 Shared Use of Educational Facilities

- (i) To encourage the co-location of schools/education facilities as part of education campuses and with other community uses to create community hubs.
- (ii) To support the shared use of school or college grounds and facilities with the local community, outside of core hours, anchoring such uses within the wider community.

Chapter 11: Built Heritage and Archaeology

Policy BHA9 Conservation Areas

Protect the special interest and character of all Dublin's Conservation Areas identified under Z8 and Z2 zoning objectives and denoted by red line conservation hatching on the zoning maps. Development within or affecting a Conservation Area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.

Chapter 14: Land Use Zoning

Section 14.7.1 Sustainable Residential Neighbourhoods – Zone Z1

'To protect, provide and improve residential amenities'.

In both new and established residential areas, there will be a range of uses that have the potential to foster the development of new residential communities. These are uses that benefit from a close relationship with the immediate community and have high standards of amenity, such as childcare facilities, schools, community facilities, personal services, local shops, open space, recreation and amenity uses.

Z1 Permissible Uses – Education is listed as a permissible use class.

Section 14.7.14 Community and Social Infrastructure – Zone Z15

'To protect and provide for community uses and social infrastructure'.

Z15 lands comprise a variety of sites, often consisting of long-established complexes of institutional/community buildings and associated open grounds. The existing uses

on these lands generally include community, social or institutional development such as schools, colleges, sports grounds, residential institutions and healthcare institutions, such as hospitals.

Z15 Permissible Uses – Education is listed as a permissible use class.

Section 14.7.2 Residential Neighbourhoods (Conservation Areas) – Zone Z2

‘To protect and/or improve the amenities of residential conservation areas’.

The principal land-use encouraged in residential conservation areas is housing but can include a limited range of other uses. In considering other uses, the guiding principle is to enhance the architectural quality of the streetscape and the area, and to protect the residential character of the area.

Section 14.6 Transitional Zone Areas

The land-use zoning objectives and control standards show the boundaries between zones. While zoning objectives and development management standards indicate the different uses permitted in each zone, it is important to avoid abrupt transitions in scale and land-use between zones. In dealing with development proposals in these contiguous transitional zone areas, it is necessary to avoid developments that would be detrimental to the amenities of the more environmentally sensitive zones.

Chapter 15: Development Standards

Section 15.4.2 Architectural Design Quality

Imaginative, innovative and contemporary architecture is encouraged in all development proposals, provided that it respects Dublin’s heritage and local distinctiveness and enriches the city environment.

Key Principles to consider include:

- The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site.

- The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines.
- The suitability of the proposed design to its intended landuse and the wider land-use character of the area, along with its relationship with and contribution to the public realm.
- The need to protect and enhance natural features of the site, including trees and any landscape setting.
- The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling.

Section 15.5.2 Infill Development

Dublin City Council will require infill development:

- to respect and complement the prevailing scale, mass and architectural design in the surrounding townscape.
- to demonstrate a positive response to the existing context, including characteristic building plot widths, architectural form and the materials and detailing of existing buildings, where these contribute positively to the character and appearance of the area.
- Within terraces or groups of buildings of unified design and significant quality, infill development will positively interpret the existing design and architectural features where these make a positive contribution to the area.
- In areas of low quality, varied townscape, infill development will have sufficient independence of form and design to create new compositions and points of interest.
- Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts in the surrounding neighbourhood.

Section 15.5.5 Density

Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 guidelines which seek to consolidate within existing urban areas. New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity.

Section 15.6.7 Landscape Design Rationale

The incorporation of landscape features to protect and support biodiversity and to ensure the existing landscaping and environments are protected will be required as part of all applications.

Section 15.6.9. Trees and Hedgerows

Dublin City Council will seek to protect existing trees and hedgerows when granting planning permission for developments and will seek to ensure maximum retention, preservation and management of important trees, groups of trees, and hedges as set out in Section 10.5.7 of the Plan.

Dublin City Council will encourage and promote tree planting in the planning and design of private and public developments. The following criteria shall be taken into account by Dublin City Council in assessing planning applications on sites where there are significant individual trees or groups/ lines of trees, in order to inform decisions either to protect and integrate trees into the scheme, or to permit their removal:

- Habitat/ecological value of the trees and their condition.
- Uniqueness/rarity of species.
- Contribution to any historical setting/conservation area.
- Significance of the trees in framing or defining views.
- Visual and amenity contribution to streetscape.

Section 15.7.1 Re-Use of Existing Buildings

Where development comprises existing buildings, applicants are encouraged to reuse and repurpose the buildings for integration within the scheme, where possible in accordance with Policy CA6 and CA7.

Section 15.9.18 Overlooking and Overbearance

Overbearance in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space serving a home. In established residential developments, any significant changes to established context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance. Overlooking may be overcome by a variety of design tools, such as:

- Building configurations (bulk and massing).
- Elevational design / window placement.
- Using oblique windows.
- Using architectural features.
- Landscape and boundary treatments.

Section 15.15.2.2 Conservation Areas

Conservation Areas include Z8 (Georgian Conservation Area) and Z2 (Residential Conservation Area) zones, as well as areas identified in a red hatching on the zoning maps which form part of the development plan. All planning applications for development in Conservation Areas shall:

- Respect the existing setting and character of the surrounding area.
- Be cognisant and/or complementary to the existing scale, building height and massing of the surrounding context.
- Protect the amenities of the surrounding properties and spaces.

- Provide for assessment of visual impact of a development in the surrounding context.
- Ensure materials and finishes are in keeping with the existing built environment.
- Positively contribute to the streetscape. Retain historic trees as they add to the special character of an ACA.

Volume 3: Zoning Maps

Map H: The appeal site is zoned under Land Use Zoning Objectives Z1 and Z15.

Archaeology

As indicated on Map H Volume 3, the wider Gonzaga College campus is partially located within a Zone of Archaeological Constraint (Battle of Rathmines DU022-081).

5.4 Natural Heritage Designations

Natura 2000 Site	Site Code	Distance to Appeal Site
South Dublin Bay SAC	000210	c.3.0km
North Dublin Bay SAC	000206	c.6.7km
Rockabill to Dalkey Island SAC	003000	c.10.7km
Wicklow Mountains SAC	002122	c.9.0km
Howth Head SAC	000202	c.12.0km
Glenasmole Valley SAC	001209	c.10km
South Dublin Bay pNHA	000210	c.3.0km
Grand Canal pNHA	002104	c.1.5km
South Dublin Bay and River Tolka SPA	004024	c.3.0km
North Bull Island SPA	004006	c.6.8km
North West Irish Sea SPA	004236	c.7.3km

6.0 EIA Screening

The proposed development has been the subject of preliminary examination for environmental impact assessment (Refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development therefore does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

7.0 The Appeal

7.1. Grounds of Appeal

7.1.1. The decision of the Planning Authority made on the 27th of March is the subject of a Third-Party appeal by Antoinette Assaf. The matters raised are summarised below:

- Third-party is the owner of no.'s 12 & 13 Park Drive, and a barrel-roofed mews to the rear of no. 12 which shares a party wall with the three-storey building.
- Intrinsic relationship between Gonzaga College and surrounding residential areas. Existing school buildings are located in the centre of the campus away from sensitive boundaries.
- Siting the scheme at the periphery of the campus imposes potential externalities to neighbouring properties and adjoining streets.
- Planning authority is concerned with preserving playing pitches over evaluating the appropriate siting of the facility.
- Functionality of providing a new primary school within a post-primary school campus is not examined.
- Description of the development as a change of use is misleading and understates the extent of demolition.
- Site plan does not indicate dimensions to the boundary wall or to the rear wall of adjoining properties.

- Failure to present a rationale for siting the primary school on Z1 zoned lands where negative impacts are imposed on dwellings located in Zone Z2 and which is contrary to Section 15.15.2 of the Development Plan.
- Likely that the Z1 zoning was intended for school-related residential accommodation. Z15 zoning would have applied otherwise.
- Proposal impacts the Z2 Residential Conservation Area zoning. The Design Statement does not refer to the scheme's relationship with properties in the Residential Conservation Areas (Z2) and is contrary to Section 15.15.2.2 of the Development Plan and associated planning application requirements.
- Layout and siting are poorly conceived and contrary to policies and objectives of the Development Plan.
- No rationale presented for the orientation of a courtyard around an existing tree and former pavilion building of little architectural merit. Overall intent is to use the form of the three-storey building to justify locating a primary school away from Gonzaga's own buildings and amenities.
- No justification for positioning floor plate to the boundary with No. 13 Park Drive.
- Increasing the height of three-storey building impacts residential character.
- Loss of residential amenity arising from use of multi-resource facility.
- The multi-purpose hall may block access to the southern gable of the mews giving rise to maintenance concerns and obstruction of facilities.
- Management of Development policies relevant to the application are Sections: 15.5.2 Infill Development, 15.5.5 Density, 15.6.7 Landscape Design Rationale, 15.6.9 Trees and Hedgerows, and 15.9.18 Overlooking and Overbearance.
- Contrary to Section 15.9.18 which requires consideration of any significant changes to an established context in residential areas. Relocation or reduction in bulk/height is required to ameliorate overbearance.
- Layout and design fail to accord with Section 15.5.2 of the Development Plan.
- The planning authority fails to understand or assess potential impacts on residential amenity of neighbouring property and fails to consider the loss of boundary trees/replacement with a high blank wall with consequent overbearance. Contrary to Sections 15.5.5, 15.6.7, and 15.9.18 of the Development Plan.

- Failure to comply with Section 15.6.9 of the Development Plan in relation to Trees and Hedgerows.
- Sylvan setting and planting will be lost. Current parkland setting allows natural light to garden and living areas and will be impacted by provision of a solid wall.
- Reference to planning history: WEB2190/24, WEB1065/19 /ABP 304727-19.
- An Bord Pleanála under Condition no. 2 of ABP-304727-19 set an important context for Z15 lands, requiring additional boundary planting. Proposal is inconsistent with condition /no justification for setting aside planning principles.
- Visual Assessment is limited, inadequate in scope and does not provide analysis of potential impacts on Park Drive properties.
- Extract from the Daylight/Sunlight Analysis and Overshadowing study does not indicate the impact of garden shadow which will be significant in the morning.
- Potential for variance with 'real world impacts' post-construction.
- 'Cold feeling' arising from destruction of the sylvan boundary is not captured.
- Overbearance on property and gardens impacts attractiveness and value.

Appendix No. 3 Letter from Ms. Assaf

A letter from the appellant seeks to provide the Commission with an understanding of the impact of the scheme on her property and amenity. The matters raised are summarised as follows:

- Letter contains personal observations to reflect lived experience of the property and the impacts of the proposal on the appellant's home.
- Acknowledges architectural design, importance of the school and intention behind the proposed relocation. Equal consideration should be afforded existing residential developments.
- Scheme results in permanent alteration of outlook and environment.
- Principal living spaces are orientated to connect with the garden, giving a sense of openness, light and visual connection to outdoor space.
- Extant buildings closest to the boundary have a residential or ancillary character, while the main school buildings are located to the far end of the site.
- Extension to three storey building (height, width and proximity) brings a greater mass directly to the boundary.

- Loss of natural light.
- Impact is immediate and pronounced given the garden of No. 13 is amongst the shortest on Park Drive.
- Removal of trees and increase in scale alters the character of the space.
- Substantial multi-functional hall along the boundary replaces the current soft backdrop with a continuous structure of significant scale. Proximity and scale dominate the garden and reduce sense of space and openness.
- Use of the hall beyond school hours gives rise to a risk of disturbance.
- Mews design had regard to the scale of adjoining buildings. The proposed scheme would result in a continuous and enclosing built form removing light and increasing overbearance.
- Practical implications, including ability to safely access and maintain property. Reasonable access, light and ventilation is required.
- A greater set back, reduced scale or retention/reinforcement of boundary planting would significantly lessen impacts on adjoining property.

7.2. Response of the First Party

7.2.1. The matters raised in the response of the First Party are summarised below.

- Grounds of appeal do not introduce new of substantive planning considerations and are not supported by policy or technical evidence.
- Any limited or perceived impacts arising from the development are acceptable within an established urban setting and are outweighed by the social and community benefits delivered.
- Response provides introduction, overview and description of the development.
- Statement of Case sets out the requirement for the school and that the existing premises at Northumberland Road is no longer fit for purpose.
- Relocation to Gonzaga College provides opportunities for interaction with the wider educational community and access to campus amenities.
- Delivery of essential social and community infrastructure complies with QHSN53, QHSN50, QHSN20 and aligns with QHSN16 and QHSN17 of the Dublin City Development Plan.

- Schools and inclusive community infrastructure which meet the needs of the community are supported.
- Development is compliant with Policy BHA11 in retaining/re-use of existing built fabric. School will operate as an integrated component of a wider campus.
- Clustering of buildings is inherently suited to special educational needs. Scheme intentionally inward looking, having regard to the interface with adjoining properties and accords with Section 14.6 Transitional Zone Areas.
- Compliant with Policy BHA9 and integrates with context of Park Drive.
- Consistent with Policies SC19 and SC21, promoting high-quality inclusive architectural design, contributing positively to context and healthy placemaking.
- Consistent with Section 14.6 of the Development Plan- Transitional Zone Area.
- Zoning Objective Z1 can be achieved through a range of supporting community uses including schools and educational facilities. Proposal is permitted under Z1 and Z15 zonings with no material contravention of the Development Plan
- Assertion that site intended for residential purposes is unfounded.
- Z15 zoning reinforces the established institutional character of the lands and represents a continuation of educational use.
- Section 15.6.9 does not impose an absolute requirement for retention of trees nor preclude removal where necessary for development.
- Leyland Cypress Trees are not protected or identified as being of significant ecological value; are non-native and are not subject to Tree Preservation Orders. Removal does not result in material planning harm.
- Description of existing boundary as 'sylvan' is not an accurate description and would be better attributed to the wider complex of open spaces and mature trees, forming a backdrop to the Conservation Area.
- Consolidation of a brownfield site protects the wider landscape, avoiding loss of recreational facilities and open space.
- Scale and massing are consistent with the established built context, and no undue overbearing impacts arise when assessed with Section 15.19.18.
- Proposal accords with the scale of existing structures. Tallest element is in approximately the same location as the three-storey building, albeit extended. The hall has been intentionally designed with a sloping roof.
- Potential for overlooking addressed through design and by condition.

- Site is not characterised by open or undeveloped boundary conditions but is an extant part of a long-standing campus.
- Verified views demonstrate the development as part of an institutional complex without presenting an overly dominant or intrusive feature
- Potential for impact on daylight and sunlight are assessed to (BRE 209 2022) with the findings of the Daylight and Sunlight Report demonstrating all windows assessed comply with Vertical Sky Component (VSC) criteria and compliance with Annual and Winter Probable Sunlight Hours (APSH/WPSH) requirements. Neighbouring gardens exceed minimum Sunlight on Ground (SOG) standards and minor variations relate to pre-existing conditions.
- Planning authority raised no concerns to daylight and sunlight analysis.
- Design has been carefully considered to minimise overlooking.
- Planning authority concluded overlooking impacts were limited and imposed a condition requiring installation of obscured glazing.
- Appendix 1–7 relate to documentation and reports forming part of P.A. Reg. Ref. WEB 5857/25. Appendix 3 - Planning Drawings as referenced in the First Party Appeal Statement are not included. All relevant drawings were submitted with the planning application and are available for inspection on the public planning register and are before the Commission.

7.3. Response of the Planning Authority

- 7.3.1. Requests that the grant of permission is upheld and a condition requiring the payment of a Section 48 Development Contribution is levied in the event of permission.

7.4. Observations

An Observation has been received from Ann Kerr. The matters raised are summarised as follows:

- Concerns in relation to misleading description of the project as a change of use.
- Proposal comprises extensive development on the boundary walls of properties on Park Drive and Albany Road.

- Increased height and expansion of the two-storey building will have an overbearing impact on surrounding dwellings and on the residential character of the area.
- The grounds of Gonzaga College are extensive. Building height could be reduced and redesigned so as not to interfere with light.

8.0 Assessment

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

- Principle of Development
- Impact on Residential Conservation Area
- Impact on Residential Amenity
- Loss of Trees and Proposed Boundary Treatment
- Other Matters

8.2. Principle of Development

8.2.1. The buildings forming part of the appeal site are easily accessible from the internal road and pedestrian network serving the school, with no boundary or other physical demarcation separating the site from the wider campus. The structures lie immediately north of the cricket grounds and are stated to have fulfilled a variety of roles in support of the school over the years, including residential, storage and changing areas. I am satisfied from inspection, that the site and buildings thereon, could not be considered functionally separate from the wider campus, notwithstanding the location of the main school buildings further to the south.

- 8.2.2. The earliest buildings on site date from the mid-nineteenth century (Buildings 1 and 2) as determined under the Historic Building Survey conducted by Claire Walsh. I note the survey's conclusions, that the structures are of little or no architectural, archaeological or historical significance or merit. A timber staircase in Building 1 and infilled fireplace in Building 2 are original internal features. I refer to the report of the City Archaeologist which finds no objection to the development, subject *inter alia*, to agreeing by a strategy to safely disassemble, store and reuse these features.
- 8.2.3. The majority of the appeal site and adjoining college garden, located to the north-west corner of the campus, are subject to land use zoning objective Z1 '*Sustainable Residential Neighbourhoods*' where the objective seeks '*to protect, provide and improve residential amenities*'. The site is also partially located within land use zoning objective Z15, *Community and Social Infrastructure* which seeks '*to protect and provide for community uses and social infrastructure*'.
- 8.2.4. The Z1 lands are bounded by residential lands zoned Residential Neighbourhoods (Conservation Areas) under Zone Z2, with such lands located to the north and west of the site, including Albany Road and Park Drive respectively. As stated in Section 11.5.3 of the Dublin City Development Plan 2022-2028 (The Development Plan), whilst these areas do not have a statutory basis in the same manner as protected structures or Architectural Conservation Areas (ACA's), they are recognised as areas having conservation merit and importance and warrant protection through zoning and policy application. Whilst zoned Z2, the residential properties which bound the site to the north and west are not protected structures.
- 8.2.5. The appellant suggests that the Z1 zoning may have been attributed to the appeal lands in order to facilitate on-site residential accommodation for the school or given the lands proximity to extant residential areas. I am not aware however, of a specific objective within the Development Plan to give effect to this belief, and I note that the lands appear to have been zoned under Z15 over at least the last two consecutive Dublin City Development Plans.
- 8.2.6. Under Section 14.3.1 of the Plan, a permissible use is one *which is generally acceptable in principle in the relevant zone, but which is subject to normal planning*

considerations, including the policies and objectives outlined in the Plan. Section 14.3 also states that there is a presumption against uses not listed under the permissible or open for consideration categories in Z1.

- 8.2.7. Education is expressly listed as a permissible use under both Z1 and Z15 land use zoning objectives set out in Section 14.7 -Primary Land-Use Zoning Categories.
- 8.2.8. I note Section 14.6 of the Development Plan concerning Transitional Zone Areas and the requirement to avoid abrupt transitions in scale and land-use between zones. In addressing development proposals in such areas, it is necessary to avoid development which would be detrimental to the amenities of the more environmentally sensitive zones. While I will examine in later sections of this report matters relating to design, scale and impact on neighbouring residential areas; I am satisfied given the historic positioning of the structures at this location, their relationship with the wider school complex and uses therein, that a proposed primary school would be compliant with the underlying zoning objectives, and is consistent with the ongoing educational use of the wider campus. I do not contend therefore, that the development would result in an abrupt transition between the tripartite land use zonings Z1, Z2 and Z15.
- 8.2.9. I note concerns that a robust rationale has not been provided in support of a primary school within this post-primary campus, and that the planning authority has not adequately considered how a new and separate school would function in this context. St. Declan's, which currently operates from a property on Northumberland Road Ballsbridge, will comprise approximately 50 no. students, with 22 no. staff. I refer also to particulars included within the Architectural Design Report, and the Architectural Design Statement which set out the requirements for this specialised educational facility and the design considerations necessary to facilitate same. The planning authority in its assessment has concluded that a new school could be accommodated within the existing campus with no significant impacts arising in relation to access, parking, servicing, or connection to public services. Having regard to the particulars available on file, and the reports of internal Council Divisions, I am satisfied that a new school of the scale proposed could be accommodated within this established post-primary educational campus. I am not aware of any significant functional

constraints which would impact the co-location of a primary and post-primary facility on this large campus, noting that such arrangements are commonplace.

8.2.10. I am similarly satisfied that the application particulars clearly demonstrate a rationale and justification for relocating the school, noting that the existing facility is stated as being no longer fit for purpose, having been established at Northumberland Road in 1958. I refer the Commission to Section 5.5.8 Chapter 5 of the Development Plan relating to Schools and Education, where it is stated that the Council will encourage innovative school design which provides for efficient use of urban lands and which embraces sustainable mobility management. I refer also to Policy QHSN54 – Shared Use of Educational Facilities which encourages the co-location of schools/education facilities as part of education campuses and with other community uses to create community hubs. In addition, Policy SC11 of the Development Plan seeks *inter alia* compact growth and sustainable densities through consolidation and intensification of infill and brownfield lands. Furthermore, I refer to the response of the first party, wherein it is stated that relocation of St. Declan's to the subject site, provides opportunities for interaction with the wider educational community and access to campus amenities.

8.2.11. Accordingly, I am satisfied that the application has demonstrated a clear supporting rationale for the relocation of St. Declan's primary school to the Gonzaga College campus and that the co-location of educational facilities as well as the re-purposing and extension of existing buildings is supported by policies and objectives of the Development Plan.

8.3. Impact on Residential Conservation Areas

8.3.1. I refer to concerns raised that insufficient regard has been taken of impacts arising on Z2 zoned lands to the north and west of the appeal site which abut Gonzaga College. I note concerns that the proposal fails to accord with Section 15.15.2 Built Heritage and Section 15.15.2.2 Conservation Areas of the Development Plan, noting that Section 15.15.2.2 prescribes specific criteria to which all planning applications for development in Conservation Areas must comply.

- 8.3.2. Properties on Park Drive and Albany Road which bound the site are not protected structures and the surrounding area is not a designated Architectural Conservation Area (ACA). The closest protected structures to the site are dwellings located on Park Drive to the south and Sandford Lodge, a former house (RPS 7428) located off the Sandford Close entrance to the campus.
- 8.3.3. The northwestern corner of the college grounds demonstrates a mix of building forms, with variations in design, height and scale which have accommodated a variety of uses over the intervening years, the most recent being residential, storage, changing areas and sanitary facilities. It is understood from the *'Building Survey at site of proposed development for St Declan's School'*, that the earliest structures on site - Buildings 1 and 2 are recorded as being of mid-nineteenth century origin. As such, the proposal could not be considered to relate to a greenfield plot, but rather to a long established and active complex of buildings functionally related to the school.
- 8.3.4. I note also contemporary development, including a mews dwelling to the rear of No. 12 Park Drive which abuts the western elevation of the three-storey building on site.
- 8.3.5. As expressed under Section 15.15.2.2 of the Development Plan, it is incumbent in all planning applications for development in Conservation Areas to have regard to matters including scale, building height, massing, and amenities of properties and space and to provide for an assessment of visual impacts arising. I am satisfied that the suite of documents/reports provided is sufficient to enable a full assessment of the scheme and its impacts on Z2 zoned lands. I refer the Commission in particular to the Daylight/Sunlight Analysis and Overshadowing; the Archaeological Desk Report and subsequent Historic Building Survey; the Architectural Design Report; Architectural Design Statement and Architectural Visualisation (Verified Views) provided within the application. Having regard to the nature of the lands and their location within a transitional area, I am satisfied that the level of detail provided within the application and supporting specialist reports, available to the planning authority in making its assessment, enabled a full understanding of the nature and extent of all impacts arising, including on adjoining lands zoned Z2.

8.4. Impact on Residential Amenity

- 8.4.1. The proposed development relates to an existing cluster of structures, which range from single to three-storey in height. The tallest of these structures, a former residential block is positioned to the western boundary of the site. The structure's existing roof ridge is shown as 34.54 OD on the *Drawing No. SDS-P-120 Section A-A and Section B-B*, which largely coincides with the proposed eaves level of the new block. The finished roof ridge level of the new three-storey structure is 36.44OD (on the same drawing) denoting an overall increase in building height of 1.9m.
- 8.4.2. I refer the Commission to '*Drawing No. SDS-P-151 – Proposed East and West Elevations*' which illustrates the extent of the three-storey block along the western boundary relative to the extant structure currently in place. I refer also on the same drawing to the western elevation of the single storey multi-purpose room which has a principal ridge level of 31.47OD which is below the roof height of the Mews (32.48OD). Overall, the western elevation of the proposed hall is shown as extending a maximum of 4.1m above the top of the boundary wall, sloping down as it approaches the mews structure.
- 8.4.3. With respect to the proposed western block relative to property on Park Drive, I refer to the current relationship between these properties and existing buildings, notably with the extant three-storey structure. Having regard to the current and long-standing relationship between these properties, I am not of the opinion that the proposed development would give rise to significant loss of amenity or overbearance to property bounding the site, as a result of the increase in height and extension along this boundary. I am satisfied that the proposal would achieve a density of development appropriate to the site conditions and would respect the existing character, context and urban form of the area as required under Section 15.5.5 of the Development Plan. I am also satisfied that the proposal demonstrates an overall positive design response to the existing context in terms of its architectural design, mass and scale and is considered to be in compliance with the requirements of Section 15.5.2 of the Development Plan relating to Infill Development proposals.

- 8.4.4. The design, form and arrangement of buildings provide limited opportunities for views towards third party property. I refer in this regard to Condition No. 3 of the planning authority's decision, requiring fenestration serving the northern elevation of Classroom 6 on the second floor to be permanently obscured to a minimum of 1.8m high as measured from finished floor level. The Commission might also consider extending this condition to apply to the window serving classroom no. 4 on the first floor, where the upper extent of glazing extends above the boundary wall.
- 8.4.5. I refer all to accessible terrace on the first floor in proximity to the principal's office. The Commission may consider it appropriate to seek the installation of a screen or similar obscuring feature to the northern side of this amenity, so as to prevent overlooking of gardens on Albany Road. Accordingly, I consider that the development would not give rise to excessive levels of overbearance or overlooking and would be compatible with the requirements of Section 15.9.18 of the Development Plan.
- 8.4.6. While concerns are raised in relation to afterhours use of the multipurpose room and potential for noise intrusion, there are no opes within this structure other than those addressing the courtyard. As such, activity and associated pedestrian movements would be focused within the internal area/courtyard and use of the building outside of school hours would be unlikely to be excessively intrusive on residential property.
- 8.4.7. I not concerns in relation to the potential of the multi-purpose hall to block access to the southern gable of the mews and to give rise to maintenance concerns/obstruction of facilities (vents, heat recovery). Disputes in relation to such issues are considered to be civil matters between the parties and outside the scope of this planning appeal, having regard to the provisions of S.34(13) of the Planning and Development Act 2000, as amended.
- 8.4.8. I have reviewed the Daylight/Sunlight Analysis and Overshadowing Report which assessed neighbouring properties to the west, and north of the subject site with the analysis covering Vertical Sky Component (VSC), Annual/Winter Probable Sunlight Hours (APSH/WPSH) and Sunlight on Ground (SOG). Each dwelling assessed achieved the required standards as per BRE 209 (2022). Seasonal shadow studies

confirm no significant new losses to adjoining properties beyond those already existing in an urban context.

- 8.4.9. Accordingly, I do not hold that the development gives rise to excessive levels of overbearance, loss of sunlight or material diminution of light to garden areas. Matters of overlooking are limited in extent and may be addressed by the insertion of obscured glazing and screening at appropriate locations. I do not consider therefore that the development would be contrary to Section 15.9.18 of the Development Plan in relation to overlooking and overbearance.

8.5. Loss of Trees and Proposed Boundary Treatment

- 8.5.1. The development will entail the removal of a row of Leyland cypress trees along the western boundary, and concerns are expressed regarding their loss and replacement with a solid wall which is considered to impact natural light and the parkland setting.
- 8.5.2. Section 15.6.7 of the Development Plan refers to the importance of landscaping in the urban environment and specifically refers to the contribution of hard landscaping in defining the character of spaces between buildings and open spaces. With respect to Section 15.6.9, the Development Plan requires with regard to Trees and Hedgerows, that specific criteria be taken into account in instances where significant individual trees or groups of trees are proposed for removal as part of an application. This criterion includes the habitat/ecological value of the trees and their condition; uniqueness/rarity of species; contribution to any historical setting/conservation area; significance of the trees in framing or defining views and contribution to streetscape.
- 8.5.3. The trees in question comprise a row of Leyland conifers which have been lopped to reduce height, and which provide limited visual amenity or aesthetic value to the western site boundary. The trees, which are non-native offer very little in terms of natural amenity or biodiversity value. This is supported by the findings of the Bat Survey, wherein the trees were assessed as having negligible bat roost potential and were considered to be of *'very little value for the biodiversity of the site'*. Neither do the trees, in my opinion, contribute to the historical setting of the site; or define views. and

As such, I am of the view that their removal would not be contrary to the requirements of Section 15.6.9 of the Development Plan.

- 8.5.4. I have also reviewed the decision of An Bord Pleanála under ABP-304727-19, noting Condition No. 2 which required *inter alia* the provisions of supplementary planting between the site and properties on Park Drive. Given the scheme in question related to the provision of a 3G artificial turf pitch with associated ball stop netting and flood lighting, I do not consider the current proposal to be directly relatable, and I am satisfied that the removal of the trees in question would not result in material loss of amenity to neighbouring property.

8.6. Other Matters

8.6.1. Ecology

I refer to the Bat Survey Report undertaken by Aidan Murphy-Flynn Furney Environmental Consultants, which concluded no evidence of roosting bats was found in any of the on-site structures and that overall activity levels were considered very low with bat encounters indicating the site is not an important area for local populations. While five of the on-site buildings were assessed as having negligible to low bat roost suitability, the Mews was identified as having medium to high suitability, owing to holes in the slate roof with potential roost features suitable for bats. The report recommends that the Mews is resurveyed by a suitably qualified ecologist, prior to any refurbishment works. The report also recommends the installation of bat boxes and appropriate luminaire specifications to enhance the site for bat species. A planning condition giving effect to the foregoing is suggested, if a grant of permission is under consideration.

An Ecological Impact Assessment Report compiled by Flynn Furney Environmental Consultants recorded multiple signs of activity to support the presence of a Badger sett in woodland close to the site. The report recommends a Badger survey is carried out by a licensed ecologist, at the appropriate time of year when Badger activity is more detectable and prior to construction. If the sett is found to be active, it should be fully protected and specific mitigation recommended. A condition giving effect to such

additional surveys and planned mitigation measures should be included is permission is under consideration.

8.6.2. Development Description and Documentation

I refer to matters raised concerning the adequacy of the development description and absence of specific dimensions on the plans provided. Concern is raised that the description of development as a change of use is misleading, and the extent of demolition understated. I note the development description contained within the public notices, together with the plans, drawings and supporting reports provided which clearly describe the full extent of the scheme and illustrate the level of demolition required. On review of all documentation on file, I am not of the view that the description of development is misleading or otherwise inadequate to describe the proposal at hand. Overall, I consider the documentation, including plans and drawings to be of a high standard and quality, enabling all parties to determine the nature and extent of the scheme under consideration.

8.7. AA Screening

- 8.7.1. I have considered the proposed development in light of the requirements of S177U of the Planning and Development Act 2000, as amended.
- 8.7.2. The Planning Authority undertook Appropriate Assessment Screening, determining that there was no likelihood of significant effects on a European Site.
- 8.7.3. No nature conservation concerns were raised in the planning appeal.
- 8.7.4. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because it could not have any effect on a European Site. The reason for this conclusion is as follows:
 - The nature and scale of the development within an existing serviced educational campus with connections to public services.
 - Separation distance from nearest water bodies and lack of hydrological / ecological connections to European sites.

- Taking into account the Determination of the planning authority

I conclude on the basis of objective information, 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.

Likely significant effects are excluded and thereafter Appropriate Assessment (stage 2) under Section 177V of the Planning and Development Act 2000) is not required.

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

9.0 Water Framework Directive

- 9.1.** The proposed development comprises the construction of a primary school within the grounds of Gonzaga college, Sandford Road, Ranelagh Dublin 6, an existing serviced educational campus. The development relates specifically to a plot to the north-west of the campus, re-purposing and extending an existing cluster of structures. The appeal site is separated by a distance of approximately 0.67km from the River Dodder IE_EA_09D01900 to the south-east and is c.1.5km from the Grand Canal Main Line (Liffey and Dublin Bay) IE_09_AWB_GCMLE to the north. The site is within the Liffey and Dublin Bay Water Framework Directive (WFD) Catchment ID09. The ground waterbody is Dublin IE_EA_G_008 which is described as poorly productive bedrock.
- 9.2.** I have assessed the development seeking permission and have considered the objectives as set out in Article 4 of the Water Framework Directive which seeks to protect and, where necessary, restore surface and ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration.
- 9.3.** Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively. The reason for this conclusion is as follows:

- The nature and scale of the development within an existing serviced educational campus with connections to public services.
- Location and distance from nearest waterbodies and/or lack of hydrological connections.

I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

10.0 Recommendation

I recommend a grant of permission for the reasons and considerations set out below:

11.0 Reasons and Considerations

Having regard to the nature, design and layout of the proposed scheme and to the character and pattern of development in the vicinity, it is considered that the provision of a primary school is acceptable on this site, where education is permitted in principle under Zone Z1 and Zone Z15 of the Dublin City Development Plan 2022-2028. If carried out in accordance with the conditions set out below, the proposal would not unduly impact the residential amenities of neighbouring residential property to the west and north. The development is acceptable in terms of traffic safety and convenience and would be in accordance with proper planning and sustainable development.

12.0 Conditions

1	The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, received by the planning authority on the 3 rd day of December 2025, as amended by Further Information lodged on the 2 nd of March 2026, except as may otherwise be
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	required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars. Reason: In the interest of clarity
2.	Prior to the commencement of development, revised plans, elevational drawings and sections shall be submitted for the written agreement of the planning authority demonstrating the following: (a) The installation of permanently obscured glazing to the northern elevation of Classroom 6 on the second floor and to the northern elevation to Classroom 4 on the first floor. Such glazing shall be permanently maintained therein. (b) Installation of a screen, wall or obscured glazing of suitable height to the northern elevation of the accessible terrace located on the first floor so as to prevent overlooking of neighbouring properties. Reason: In the interest of the residential amenity.
3.	(a) Prior to commencement, the developer shall submit an historic building fabric salvage and reuse strategy to the Planning Authority for written agreement. The strategy shall include details for disassembling, storage and reuse of the 19th century timber staircase in Building 1 and the infilled fireplace in Building 2 (as identified in the Building Survey at Site of Proposed Development for St. Declan's School undertaken by Claire Walsh) and lodged with the planning authority on the 2nd of March 2026. (b) The agreed strategy shall be implemented in full by the developer and a report by a suitably qualified heritage professional submitted for the approval of the planning authority prior to occupation of the school. Reason: To ensure the continued preservation of historical fabric.
4.	Details of the materials, colours and textures of all the external finishes to the proposed development shall be submitted to, and shall be agreed in writing with, the planning authority prior to commencement of development. Reason: In the interest of visual amenity and to ensure an appropriate high standard of development.

5.	A pre-construction check of the activity status of all known setts shall be required within 12no. months of any construction works commencing within the zone of influence of the setts. This survey shall be carried out by an Ecologist who is appropriately qualified and experienced in undertaking badger surveys and in line with best practice at the appropriate time of year. The developer shall ensure that the development is in compliance with the relevant legislation on the protection of badgers. The developer shall ensure that the following specific mitigation measures are implemented in order to prevent any disturbance to badger setts not directly affected by the proposed development: . No heavy machinery shall be used within 30m of badger setts at any time. . No works shall be undertaken within 50m of active setts during the breeding season (December to June inclusive). . Lighter machinery (generally wheeled vehicles) shall not be used within 20m of a sett entrance. . Neither blasting nor pile driving shall be undertaken within 150m of active setts during the breeding season (December to June inclusive) The results of the pre-construction survey and any proposed mitigation measures shall be submitted prior to the commencement of works for the written approval of the Planning Authority. Reason: To ensure the protection of badgers
6.	(a) Prior the commencement of demolition works, buildings with bat roosting potential shall be surveyed by a suitably qualified Ecologist who is appropriately qualified and experienced in undertaking bat surveys and in line with best practice at the appropriate time of year to confirm the absence of roosting bats. In the event that a previously undetected bat roost is identified and is likely to be disturbed, the developer shall acquire a derogation under Regulation 54 of the European Communities (Bird and Natural Habitats) Regulations 2011 prior to the commencement of the relevant works. Prior to the removal of trees and/or works to buildings, the bat survey results, methodologies for felling/works and any derogations shall be submitted for the written agreement of the planning authority.

	(b) Details, design and location of bat boxes to be provided on site shall be provided by a suitably qualified ecologist and submitted to the planning authority prior to the commencement of development for written agreement. Reason: To ensure the protection of bats, a protected species.
7.	Artificial lighting shall be designed in accordance with the 2023 BCT Lighting Guidance (GN08/23 Bats and Artificial Lighting At Night). A lighting plan shall be submitted to and agreed with the planning authority, prior to commencement of development. Reason: To minimise disturbance-related impacts on protected species.
8.	If, during the course of site works any archaeological material is discovered, the City Archaeologist and Planning Authority shall be notified immediately. The developer is further advised that in this event that under the National Monuments Act, the National Monuments Service, Department of Housing, Heritage and Local Government and the National Museum of Ireland require notification. Reason: In the interest of preserving or preserving by record archaeological material likely to be damaged or destroyed in the course of development.
9.	All trees within and on the boundaries of the site, except those specified trees whose removal is authorised to facilitate the development, shall be protected during construction and retained thereafter. Reason: To protect biodiversity.
10.	Drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services. Reason: In the interest of public health and surface water management
11.	All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development. Reason: In the interests of visual and residential amenity.
12.	Prior to the commencement of development, the developer shall enter into Connection Agreements with Uisce Éireann (Irish Water) to provide for service connections to the public water supply and wastewater collection network.

	Reason: In the interest public health.
13	Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Friday inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority. Reason: In order to safeguard the amenities of property in the vicinity
14	Construction and demolition waste shall be managed in accordance with a final construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The plan shall be prepared in accordance with “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects”, published by the Department of the Environment, Heritage and Local Government in July 2006. The plan shall include details of waste to be generated during site clearance and construction phases, and details of the methods and locations to be employed for the prevention, minimisation, recovery and disposal of this material in accordance with the provision of the Waste Management Plan for the Region in which the site is situated. Reason: In the interest of sustainable waste management.
15	Prior to the commencement of development, the developer or any agent acting on its behalf, shall prepare a Resource Waste Management Plan (RWMP) as set out in the EPA’s Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects (2021) including demonstration of proposals to adhere to best practice and protocols. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness; these details shall be placed on the file and retained as part of the public record. The RWMP must be submitted to the planning authority for written agreement prior to the commencement of development. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times. Reason: In the interest of proper planning and sustainable development

16	Prior to commencement of works, the developer shall submit to, and agree in writing with the planning authority, a Construction Management Plan, which shall be adhered to during construction. This plan shall provide details of intended construction practice for the development, including hours of working, noise and dust management measures and off-site disposal of construction/demolition waste. Reason: In the interest of public safety and amenity
17	The developer shall pay to the planning authority a financial contribution of €_____ (_____euro) in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

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 me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.”

Patricia Byrne
Planning Inspector

19th August 2026

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	PL-501225-DS-25
Proposed Development Summary	The development provides for demolition, reconfiguration, and extension of a cluster of buildings to the north-west corner of the Gonzaga College campus, together with change of use to provide for a primary school with associated play area, set down, parking and public services connections.
Development Address	Gonzaga College Sandford Road Ranelagh Dublin 6.
IN ALL CASES CHECK BOX / OR LEAVE BLANK	
1. Does the proposed development come within the definition of a 'Project' for the purposes of EIA?	☒ Yes, it is a 'Project'. Proceed to Q.2.
	☐ No, No further action required.
(For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to	State the Class here

be requested. Discuss with ADP.	
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☐ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
☒ Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	Part 2 Class 10 Infrastructure projects (iv) 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.
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	

No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)
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Inspector: _____ Date: _____

Appendix 2: Form 2 - EIA Preliminary Examination

Case Reference	PL-501225-DS-26
Proposed Development Summary	The development provides for demolition, reconfiguration, and extension of a cluster of buildings to the north-west corner of the Gonzaga College campus, together with change of use to provide for a primary school with associated play area, set down, parking and public services connections.
Development Address	Gonzaga College, Sandford Road Ranelagh Dublin 6
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (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).	Briefly comment on the key characteristics of the development, having regard to the criteria listed. The development provides for demolition, reconfiguration, and extension of a cluster of buildings to the north-west corner of the Gonzaga College campus, together with change of use to provide for a primary school with associated play area, set down, parking and public services connections. The site is in an existing educational campus and will connect to existing public services. It is not considered that there will be significant production of waste or use of natural resources. Given the intended use of the structure as a school, the proposed development will not give rise to significant pollution or nuisance and would not represent a risk of accidents or disasters and to human health.
Location of development	Briefly comment on the location of the development, having regard to the criteria listed

(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).	Gonzaga College is an established post primary educational facility comprising an existing boy's school. The site is not located within or adjacent a Natura 2000 site and the closest designated site is South Dublin Bay and River Tolka SPA and South Dublin Bay SAC, approximately 3.0 km from the site. There are no water courses on site. The Dodder River flows c. 0.67km to the southeast. There are no protected structures on or bounding the site. The wider campus is partially located within the zone of archaeological constraint for the Battle of Rathmines.
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).	Having regard to the characteristics of the development and the sensitivity of its location, consider the potential for SIGNIFICANT effects, not just effects. Development works have potential to give rise to temporary noise and dust emissions. Given the temporary nature of the works, and their nature, scale and separation from sensitive receptors, significant effects on the environment are not considered likely to occur.
Conclusion	
There is no real likelihood of significant effects on the environment.	EIA is not required.

Inspector: _____ Date: _____

Appendix 3 Screening for Appropriate Assessment

Screening for Appropriate Assessment Test for likely significant effects	
Case Reference Number: PL-501225-DS-26	
Step 1: Description of the project and local site characteristics	
Brief description of project	The development provides for demolition, reconfiguration, and extension of a cluster of buildings to the north-west of the Gonzaga College campus, together with a change of use to provide for a new primary school, with associated play area, set down, parking, surface water disposal and connection to public services.
Brief description of development site characteristics and potential impact mechanisms	Gonzaga College is an established post-primary educational facility for boys. The site is not located within or adjacent a Natura 2000 site and the closest designated sites are South Dublin Bay and River Tolka SPA and South Dublin Bay SAC, approximately 3.0 km distance from the site. There are no watercourses on site. The Dodder River flows approximately 0.67km to the southeast.
Screening report	Yes. An Appropriate Assessment Screening Report was prepared by Flynn Furney Environmental Consultants and lodged as part of the application. The Screening concluded that the project, both alone or in combination with other plans or projects, is not likely to have significant effects on any European site, and a Stage Two Appropriate Assessment is not required. Dublin City Council screened out the requirement for Appropriate Assessment.
Natura Impact Statement	No, Screened out
Relevant submissions	None

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

Numerous European sites were identified as being located within a potential zone of influence of the proposed development. There is no ecological justification for such a wide consideration of sites, and I have included those sites with any possible ecological connection or pathway in this screening determination

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
South Dublin Bay SAC (Site Code 000210)	Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110]	c.3.0km	None	Yes
South Dublin Bay and River Tolka SPA	Light-bellied Brent Goose (Branta bernicla hrota) [A046]	c.3.0km	None	Yes

(Site Code 004024)	Oystercatcher (Haematopus ostralegus) [A130] Ringed Plover (Charadrius hiaticula) [A137] Grey Plover (Pluvialis squatarola) [A141] Knot (Calidris canutus) [A143] Sanderling (Calidris alba) [A144] Dunlin (Calidris alpina) [A149] Bar-tailed Godwit (Limosa lapponica) [A157] Redshank (Tringa totanus) [A162] Black-headed Gull (Chroicocephalus ridibundus) [A179]			
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	Roseate Tern (Sterna dougallii) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194] Wetland and Waterbirds [A999]			
AA Screening matrix				
Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*			
	Impacts	Effects		
Site 1: South Dublin Bay SAC (Site Code 000210)	Direct: None Indirect Construction: Site clearance and construction. Localised dust, noise and vibration emissions from construction, potential surface water run-off with silt or contaminants. Operation	The scale and temporary nature of construction effects, combined with distance from receiving features make it highly unlikely that the proposed development could generate impacts of a magnitude that could affect habitat quality within the SAC for the QI listed. Conservation objectives would not be undermined. There is no pathway to surface water from the development which is separated from the River Dodder by c.670m and existing urban development / amenity		

	Activity and presence of new structures. Discharge of wastewater to UE operated public foul mains. Surface water discharge to attenuation area and connection to sewer.	grassland, which effectively prevent any runoff.
	Likelihood of significant effects from proposed development (alone) No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	
	Impacts	Effects
Site 2: South Dublin Bay and River Tolka SPA (Site Code 004024)	Direct: None Indirect Construction: Site clearance and construction. Localised dust, noise and vibration emissions from construction, potential surface water run-off with silt or contaminants. Operation: Activity and presence of new structures. Discharge of wastewater to public foul mains operated by UE. Surface water	The scale and temporary nature of construction effects, combined with distance from receiving features make it highly unlikely that the proposed development could generate impacts of a magnitude that could affect habitat quality within the SPA for the QI listed. Conservation objectives would not be undermined. There is no pathway to surface water from the development which is separated from the River Dodder by c.670m and existing urban development / amenity grassland, which effectively prevent any runoff.

	discharge to attenuation area with connection to sewer.	
	Likelihood of significant effects from proposed development (alone) No.	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	
Step 4: Conclude if the proposed development could result in likely significant effects on a European site		
I conclude that the proposed development (alone) would not result in likely significant effects on a European site. The proposed development would have no likely significant effect in combination with other plans and projects on any European sites. No further assessment is required for the project. No mitigation measures are required to come to these conclusions.		
Screening Determination		
Finding of no likely significant effects		
In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on South Dublin Bay SAC (000210) or South Dublin Bay and River Tolka SPA (004024) in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required. This determination is based on: ▪ The nature and scale of the development within an existing serviced educational campus with connections to public services.		

- Separation distance from nearest water bodies and lack of hydrological / ecological connections to European sites.
- Taking into account the Determination of the planning authority.

Possible impacts identified would not be significant in terms of site-specific conservation objectives for these sites and would not undermine the maintenance of favourable conservation condition or delay or undermine the achievement of restoring favourable conservation status for those qualifying interest features of unfavourable conservation status.

Appendix 4: WFD IMPACT ASSESSMENT STAGE 1: SCREENING

Step 1: Nature of the Project, the Site and Locality

ACP Ref.	PL-501225-DS-26	Townland, address	Gonzaga College Sandford Road Ranelagh Dublin 6.
Description of project		The development provides for demolition, reconfiguration, and extension of a cluster of buildings to the north-west corner of the Gonzaga College campus, together with change of use to provide for a primary school with associated play area, set down, parking and public services connections.	
Brief site description, relevant to WFD Screening,		The site is located in the urban area Ranelagh within an existing secondary school campus. The site is bounded by residential development to the north and west and by the school grounds/parkland setting to the south and by the college garden to the east. The proposed development will connect to public water supply and wastewater connections. There are no water features on or adjacent the subject site. There is no flood risk in the area.	
Proposed surface water details		Surface water attenuation proposals incorporate SuDs features including permeable paving, attenuation with hydrobreak on the surface water drainage network. Connection to a combined sewer is proposed.	
Proposed water supply source & available capacity		Water supply is indicated to be via public mains.	

Proposed wastewater treatment system & available capacity, other issues			Wastewater will discharge to public mains.			
Others?			Not applicable			
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)
River Waterbody	c. 0.67km to southeast	River Dodder_050, IE_EA_09D01900	Moderate	At Risk	Moderate status in latest EPA update.	Surface water from the site will discharge into an attenuation area and then to public sewer. Sewage will discharge to public foul mains.
Groundwater Body	Underlying the site	Dublin IE_EA_G_008	Good	Review	Good Ground Water	Water arising on site can seep into the groundwater

							particularly during the construction phase when the bare soil is exposed.
Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.							
CONSTRUCTION PHASE							
No.	Component	Waterbody receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	River	Dodder_050, IE_EA_09D019 00 discharges to the Liffey Estuary	Surface water discharge to attenuation area and controlled discharge to sewer	Silt/Hydrocarbons /Cement products spillages	None Standard Construction Practice CEMP	No	Screened out
2.	Ground	Dublin IE_EA_G_008	Drainage to groundwater	Hydrocarbons /Cement products	None Standard	No	Screened out

				spillages discharging into groundwaters	Construction Practice		
OPERATIONAL PHASE							
3.	Surface	Dodder_050, IE_EA_09D019 00	Discharge to public sewer network	None	None	No	Screened out
4.	Ground	Dublin IE_EA_G_008	No pathway exists	None	None	No	Screened out
DECOMMISSIONING PHASE							
5.	N/A						