



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report TA0001

Strategic Housing Development

10 year permission for 512 student accommodation units (3006 no. bedspaces) including student facility centre, car parking and all associated site works.

Location

University College Dublin, Belfield, Dublin 4.

Planning Authority

Dun Laoghaire Rathdown County Council (DLRCC)

Applicant

University College Dublin

Prescribed Bodies

Transport Infrastructure Ireland
National Transport Agency

Observer(s)

Mary O'Reilly
Noel & Ann Carroll
David & Anne Hearn
Eva Dowling
Daniel Dowling
Elizabeth Moore Dowling
Vincent Dowling
Jim & Maura Hegarty
Richard & Anne Greene
Joan Fox
Marie Pinteau
Nicola Winters
Kevin McDonagh & Aileen Cosgrove
Helen & Brian Cathcart
Cllr Deirdre Donnelly
Cllr Barry Saul
Cllr Donal Smith
Ardilea Residents Association
John Tingle and Jodie Walsh
John O'Connor
Shane Ross T.D.

Date of Site Inspection

15th November 2017
6th December 2017

Inspector

Sarah Moran

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1.0 Introduction

- 1.1. This is an assessment of a proposed Strategic Housing Development submitted to the Board under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

2.0 Site Location and Description

- 2.1. The site (12.95 ha) is located within the UCD Belfield campus, which encompasses an area of c. 133 ha in total. The campus is situated in south Co. Dublin and is primarily accessed from the N11 Stillorgan Road to the east, with Fosters Avenue and Clonskeagh Road along the eastern and western boundaries and Roebuck Road along the southern boundary. The area around the campus is predominantly residential in nature and characterised by low density 2 storey housing, including the areas of Booterstown, Mount Merrion, Clonskeagh and Donnybrook. The overall topography is flat to undulating. The site is on the southern side of the campus and comprises 3 discreet land parcels:

- The main application site, located to the south west of the Belfield campus, c. 11.4 ha. Vehicular access from Fosters Avenue via Owenstown Park. There are 2 distinct areas within this parcel, i.e. (i) an area of playing pitches / open space / access roads / surface car parking, which is bound by Merville Student Residences to the east, the Sutherland School of Law to the north, Roebuck Hall student residences and private housing on Fosters Avenue and Owenstown to the south and Roebuck Castle estate and Belgrove student residence to the west and (ii) Roebuck Castle (a protected structure) and an associated complex of buildings including the protected structure Roebuck Glebe, with frontage to Roebuck Road and a pedestrian link between Roebuck Road and the main campus.
- The 'Little Sisters' site to the west, 1.4 ha. Bound by Belgrove student residence to the north and east, Roebuck Castle estate to the east and the Little Sisters of Mercy residences to the south.

- Third parcel, c. 0.15 ha, at the Sutherland School of Law, north east of the main application site. Situated between the Merville student residence to the west and Glenomena residence to the east.

3.0 Proposed Strategic Housing Development

3.1. The proposed development includes the following:

- 512 no. student accommodation units (3,006 bedspaces) in 7 no. blocks.
 - Block A (15,246 sq.m.), 5-7 storey with a 10 storey corner element. 75 apartments, 478 no. bedspaces, 2 retail services units and 1 no. café unit.
 - Block B (12,009 sq.m.), 5-7 storey, 6 no. apartments, 390 no. bedspaces.
 - Block C (11,970 sq.m.), 5-7 storey, 57 no. apartments, 386 no. bedspaces.
 - Block D (12,973 sq.m.), 6-7 storey, 10 storey corner element, 49 no. apartments, 12 no. Halls of Residence, 452 no. bedspaces.
 - Block E (12,023 sq.m.), 5-7 storey, 67 no. apartments, 412 no. bedspaces.
 - Block F (24,604 sq.m.), 3 separate buildings, 6-8 storey with a 10 storey corner element, 111 apartments, 12 no. Halls of Residence, 1 no. studio apartment, 828 bedspaces, 1 no. café / retail unit.
 - Fulcrum Building (8,450 sq.m.), 2-7 storey, 60 no. studio apartments, student facilities including auditorium, dining hall, food hall, 4 no. retail units, 1 no. convenience store, fitness suite, student's health and well being centre, UCD residents' contact centre and ancillary facilities.
- The student accommodation may be used as temporary visitor or tourist accommodation outside academic term times, e.g. for international students or as occasional accommodation for sports events.
- Demolition of existing buildings (total 5,291 sq.m.) in the vicinity of Roebuck Castle protected structure.
- Realignment of existing access road from the Owenstown campus entrance. New temporary construction access to Foster's Avenue and associated construction parking. Footpath and public realm works to Roebuck Road.

- 994 no. car parking spaces comprising 637 no. basement spaces, 32 no. surface spaces, expansion of existing 'Little Sisters' car park by 225 no. spaces and 100 no. spaces adjacent to Sutherland School of Law.
- Provision of 2,104 no. bicycle parking spaces comprising 510 no. basement spaces and 1,594 no. surface spaces.
- 3 no. electricity substations each with a 1.1 MW capacity.
- Associated and ancillary works including landscaping; boundary treatments; water, wastewater and surface water works and site and development works.

3.2. The development is to be constructed in 3 no. phases as follows:

- Phase 1 Blocks D, E, the Fulcrum Building, surface car parks, Owenstown Road realignment, construction access road, basement ramp.
- Phase 2 Blocks A, B and C, basement car park.
- Phase 3 Demolition of buildings at Roebuck Castle and construction of Block F, landscaping and public realm works.

A 10 year permission is sought. It is envisaged that Phase 1 will be constructed over a 24-30 month period.

4.0 Planning History

4.1. The following significant planning decisions in the vicinity of the development site are noted:

4.2. D16A/0962

4.2.1. Permission granted for 1-3 storey extension to the Quinn School of Business, located to the north of the development site.

4.3. D13A/0404

4.3.1. Permission granted for 3 no. 5 storey student accommodation blocks containing 45 no. student residences (354 no. bedspaces) and ancillary uses on a site adjoining Belgrove Student Accommodation, to the west of the development site. Now the completed Ashfield Student Residence.

4.4. **D10A/0105**

- 4.4.1. Permission granted for 2/3 storey building and ancillary facilities at the Sutherland School of Law to the north of the development site.

4.5. **D10A/0386 (as amended by D13A/0025)**

- 4.5.1. Permission granted for Commuting Facility West, a 4-5 storey building to provide 583 no. car parking spaces to replace 88 no. surface car parking spaces, with 84 no. spaces in the existing surface car park to be retained, motorcycle parking, bicycle parking, cyclist facilities, retail unit and associated works at a site on the western side of the campus, adjacent to the water tower and accessed via the Clonskeagh Road. Development has not commenced to date. Revisions permitted under D13A/0025 include 48 no. additional car spaces with total parking provision now 631 no. spaces.

4.6. **D10A/0092**

- 4.6.1. Permission granted for refurbishment of Belgrove student residence (196 no. apartments in 37 no. 3 storey blocks).

4.7. **D08A/0603**

- 4.7.1. Permission granted for 6 storey student accommodation at Roebuck Hall student residence (134 no. bedspaces), on a site to the east of the Roebuck Castle complex. Now constructed as part of Roebuck Hall student residence.

5.0 **Section 5 Pre Application Consultation**

- 5.1. A section 5 pre-application consultation took place at the office of An Bord Pleanála on 3rd August 2017. The main topics raised for discussion at the tripartite meeting were based on the agenda issued in advance as follows:

- Proposed development and existing residential amenity, including issues relating to proposed height
- Design and Siting of Block F
- Conservation
- Parking and access arrangements, including impacts on Dublin Eastern Bypass Reservation

- Biodiversity
- Drainage
- Other matters

5.2. Copies of the Inspector's Report and Opinion are on file for reference by the Board. A copy of the record of the meeting is also available on file.

5.3. An Bord Pleanála issued notification that it was of the opinion that the documents submitted with the request to enter into consultations required further consideration and amendment to constitute a reasonable basis for an application for strategic housing development. The following is a brief synopsis of the issues noted in the Opinion that needed to be addressed:

1. Design rationale / justification of Blocks A and B, to address impacts on Roebuck Castle estate including proximity to dwellings; height; extent of the blocks when viewed from Roebuck Castle estate; elevational treatment / expression; overlooking, and visual amenity.
2. Architectural conservation issues, architectural conservation report and justification of potential impacts of Blocks F1 and F2, given their proximity to Roebuck Castle protected structure. Design decisions to address elevational treatment, height and separation distances and be informed by the requirement to protect the character and setting of the protected structure. Architectural conservation report to include consideration of impacts on Roebuck Glebe.
3. Design rationale of Block F2 adjacent to Roebuck Road, to address potential impacts and provide a detailed / robust planning rationale regarding scale, height, extent of elevations and elevational treatment.
4. Quantum of car parking, in particular surface car parking at the Little Sisters car park and at the Sutherland School of Law. Other traffic and transportation matters to be addressed include cycle parking provision; construction entrance design and access arrangements; public footpath facilities at Roebuck Road and the proposed Dublin Eastern By-Pass reservation.

5. Biodiversity. EIAR to address the loss of trees and hedgerows; survey and assessment of breeding birds and impacts on bats. Further details at application stage relating to a site specific Construction and Environment Management Plan (CEMP), updated AA Screening Report to include details relating to the CEMP.
6. Drainage details having regard to section 2.3.9 'Drainage' in the DLRCC report dated 27th July 2017 and consultation with Irish Water.

5.4. The opinion notification pursuant to article 285(5)(b) also referred to specific information that should be submitted with any application as follows:

1. A detailed landscaping plan,
2. A daylight / sunlight study detailing daylight into proposed courtyards,
3. A coloured coded scaled drawing showing proposed heights,
4. Photomontages showing proposed development relative to existing protected structures,
5. Additional photomontages showing proposed development relative to existing residential development in the vicinity, and
6. Photomontages of Block F2 from surrounding streets and roadways.

5.5. Applicant's Statement Under Article 297(3)

5.5.1. Article 297(3) of the Regulations of 2017 provides:

"Where, under section 6(7) of the Act of 2016, the Board issued a notice to the prospective applicant of its opinion that the documents enclosed with the request for pre-application consultations required further consideration and amendment in order to constitute a reasonable basis for an application for permission, the application shall be accompanied by a statement of the proposals included in the application to address the issues set out in the notice."

5.5.2. The application is accompanied by a Statement of Response to the notice issued by ABP under section 6(7). The following is a short synopsis of each of the items raised in the Opinion:

- Blocks A and B and Roebuck Castle estate. Design changes to elevations facing the estate and setback from the shared boundary. Architectural rationale submitted.
- Blocks F1 and F2 and protected structures. Provision of a more neutral colour palette for Block F1 to acknowledge the heritage context and materiality of Roebuck Castle. Conservation report and architectural rationale submitted.
- Block F2 and Roebuck Road. Amendments to Block F2 elevation including the removal of a vertical stair core feature and modifications to modulation to emphasis of pedestrian gateway. Setting back and lowering of the boundary wall to Roebuck Road and enhanced public realm and views into the development.
- Parking and Transportation Matters. Adherence to the 'UCD Campus Travel Plan 2016-2021-2026' with regard to car parking. Development will result in a net increase of 10 no. spaces across the overall UCD campus. Details of proposed works to the Roebuck Road frontage. Development is in accordance with Suggested Control Measures (A) to (J) listed in Section 4 of the 'Dublin Eastern Bypass Corridor Protection Study' (2011).
- Biodiversity. Addressed in the EIAR and the AA Screening Report, in consultation with the Biodiversity Officer of DLRCC and the NPWS, including loss of trees and hedgerows; breeding bird survey; bat impact assessment; CEMP.
- Drainage. Applicant has carried out further consultation with the Drainage Division of DLRCC and Irish Water, which has informed the submitted drainage proposals.

With regard to the specific information request set out in the Opinion, the applicant has responded to each item. The response to each has been noted and will form part of the assessment of this report.

6.0 Relevant Planning Policy

6.1. National Policy

- 6.1.1. The following is a list of section 28 Ministerial Guidelines considered of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- ‘Design Manual for Urban Roads and Streets’ (2013)
- ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’) (2009)
- ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011)

The following policy documents are also relevant:

- Dept. of Education and Science ‘Guidelines on Residential Developments for 3rd Level Students Section 50 Finance Act 1999’ (1999).
- Dept. of Education and Science ‘Matters Arising in Relation to the Guidelines on Residential Developments for 3rd Level Students Section 50 Finance Act 1999.’ (July 2005)

6.2. **Dun Laoghaire Rathdown County Development Plan 2016-2022**

6.2.1. The following specific development plan objectives apply to the UCD campus:

- SLO 1 Supporting the Ongoing Development of the Campus.
- SLO 6 Eastern By Pass Corridor.
- SLO 146: To prepare a Local Area Plan for Clonskeagh / UCD.
- SLO 148: To prepare in conjunction with the National Transport Authority a Traffic Management Study for UCD and its surrounding environs to address the existing localised car parking issues within the area.
- Objectives to protect and preserve Trees and Woodlands.
- Roebuck Castle is protected structure no. RPS 217 and Roebuck Glebe is protected structure no. RPS 236.
- Proposed Quality Bus Corridor (QBC) along Fosters Avenue.

6.2.2. The following development plan policies and objectives are considered particularly relevant to the scheme:

- Section 2 policies on residential development, including Policy RES4: Existing Housing Stock and Densification and RES12: Provision of Student Accommodation. Also policies on travel and transportation including policy ST2: Integration of Land Use and Transportation Policies; ST19: Travel Demand Management and ST20: Travel Plans.

- Biodiversity policies in section 4.1.3, including Policy LHB19: Protection of Natural Heritage and the Environment and policies on open space and recreation in section 4.2.
- Section 4 green county strategy including policies on landscape, heritage and biodiversity; policy OSR7: Trees and Woodland.
- Policies on architectural and archaeological heritage including Policy AH1: Protection of Archaeological Heritage and policies on protected structures.
- Policy SIC9: Further and Higher Education Facilities.
- Urban design principles in section 8.1. Section 8.2 policies on residential development including section (xii) on student accommodation, car parking standards, open space, protected structures. Section 8.3.2: Transitional zoned areas.
- Appendix 9 Building Height Strategy.

6.3. Applicant's Statement of Consistency

6.3.1. Section 8(1)(iv) of the Act of 2016 provides that the applicant is to submit a statement setting out how the proposal will be consistent with the objectives of the relevant development plan or local area plan and, where the proposed development materially contravenes the said plan other than in relation to the zoning of land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000. The following is a brief summary of the statement submitted under section 8(1)(iv):

- SLO1. The provision of on campus accommodation and related ancillary facilities and retail and services uses will enhance the vibrancy and sustainability of the university. The nature, extent and range of facilities provided compensates for the loss of existing sports facilities at the development site, also the development includes opportunities for active and passive recreation.
- SLO6. The layout and design have due regard to the Dublin Eastern Bypass reservation corridor and the provisions of the NRA Corridor Protection Study (2011). The proposed temporary construction route will cross the reservation corridor but will not have any permanent impact.

- SLO146. The LAP preparation process has not commenced and a timeframe has not been identified by DLRCC. The development has regard to the Strategic Campus Development Plan 2016-2022-2026, which was prepared in consultation with DLRCC and the NTA. The plan provides a coherent, plan-led context for the ongoing development of the campus. Having regard to the consistency of the development with national and county level policy, the plan-led nature of the development and the contribution that the development can make to the housing crisis, it is submitted that the issue of prematurity pending the LAP does not arise.
- SLO148. The development is in accordance with the UCD Travel Plan 2016-2021-2026 including the aims to balance the amount of car parking in each cell; increase the quantum of managed visitor spaces; provide a limited number of dedicated spaces for student residence within UCD and maintain the existing quantum of car parking.
- Policy RES 12. The development provides for the provision of a plan-led expansion of on campus student accommodation and ancillary facilities, at the top of the hierarchy of priority. It complies with the detailed criteria for student accommodation set out in policy RES12.
- Building height strategy. The strategy identifies the previous UCD Campus Development Plan 2005-2010-2015 as an area subject to specific height controls and does not specify any maximum building height. The most recent 'UCD Strategic Campus Development Plan 2016-2021-2026' provides for indicative heights of 6-10 stories. The development has been designed with regard to the context of residential and protected structures.
- Conservation. The siting, massing, design and elevations of the development in the context of the protected structures were given detailed consideration. A report by a historic building consultant is submitted with the application.

6.4. Designated Sites

6.4.1. The following Natura 2000 sites are located within 15km of the development site:

| Site (site code) |
|---|
| Baldoye Bay SAC (000199) |
| Howth Head SAC (000202) |
| North Dublin Bay SAC (000206) |
| South Dublin Bay SAC (000210) |
| Ballyman Glen SAC (000713) |
| Bray Head SAC (000714) |
| Glen of the Downs SAC (000719) |
| Knocksink Wood SAC (000725) |
| Glenasmole Valley SAC (001029) |
| Wicklow Mountains SAC (002122) |
| Rockabilly to Dalkey Island SAC (003000) |
| North Bull Island SPA (004006) |
| Baldoyle Bay SPA (004016) |
| South Dublin Bay and River Tolka Estuary SPA (004024) |
| Wicklow Mountains SPA (004040) |
| Howth Head Coast SPA (004113) |
| Ireland's Eye SPA (004117) |
| Dalkey Islands SPA (004172) |

7.0 Observer Submissions

7.1. A total of 21 no. observer submissions were made under section 8(1)(vii) of the Act of 2016. The individual submissions are summarised in the attached Appendix I. The main issues that emerge are as follows:

- Most of the observers had addresses at adjacent residential areas on Roebuck Road, i.e. The Palms, Ardilea and Roebuck Castle. There are also 4 no. submissions by local elected representatives.
- There is general support for the provision of additional student accommodation within the UCD campus.
- Several submissions state that there was a lack of public consultation prior to lodgement of the application.
- Adverse impacts on residential amenities by way of overlooking, overshadowing, visual obtrusion, light pollution and noise from student activities.
- Adverse impacts on property values in the area.
- General visual impacts on Roebuck Road, particularly due to the bulk, scale and height of Block F. Development is considered to be out of character with this suburban residential area, which is predominantly 2 storey. Proposed scale of development at Roebuck Road should be located at the centre of the campus rather than at the periphery.
- Related concerns about the removal of the existing boundary to Roebuck Road and the creation of a new interface between UCD and the public realm at this location.
- Development would result in the loss of trees with consequent impacts on the sylvan setting of UCD and Roebuck Road.
- Impacts on the settings of the protected structures Roebuck Castle and Roebuck Glebe and on Crannog Lodge.
- Development would exacerbate existing traffic congestion in the area and generate demand for off street parking outside the campus.
- Construction impacts on residential amenities during the 10-year permission period including noise, traffic and dust impacts.

8.0 Planning Authority Submission

- 8.1. The planning authority Dun Laoghaire Rathdown County Council (DLRCC) has made a submission in accordance with the requirements of section 8(5)(a) of the Act

of 2016. It summarises the observer comments as per section 8(5)(a)(i) and the views of the relevant elected members as expressed at the Housing, Economic Development, Community and Cultural Development, Planning, Infrastructure and Climate Change Business Area Committee meeting held in on 23rd October 2017, as per section 8(5)(a)(iii). The matters raised in both summaries are similar to those stated in the observer submissions, as summarised above and the DLRCC planning and technical assessments, as discussed below. The planning and technical analysis in accordance with the requirements of section 8(5)(a)(ii) and 8(5)(b)(i) may be summarised as follows.

8.2. Planning Analysis

8.2.1. Core Strategy / Zoning / Principle of Development

- The development plan core strategy sets out an annual housing target of c. 3,300 dwelling units per annum between 2016-2022. Additional student bedspaces will free up housing capacity in the county and may obviate a worsening in the under-supply of completed dwelling units relative to housing demand as the student population increases. The development is consistent in principle with the core strategy.
- The development is consistent with the third level institution zoning objective relating to the site.
- The residential development is permitted in principle subject to consistency with the Dept. of Education guidelines for student accommodation. The proposed ancillary and complementary uses are also acceptable having regard to the range of uses that are permitted in principle and open for consideration within this zoning. The use of student accommodation outside of academic terms is acceptable and in line with the definition of student housing under the Act.
- The ancillary and complementary uses fulfil a community function for student residences and the wider student population in accordance with development plan sections 8.2.12.3 Community Facilities and 8.2.3.4 (xii) Student Accommodation.
- The removal of 2 no. playing pitches is acceptable having regard to the high quality of sports infrastructure in place to the wider campus.

- The development is consistent with SLO1: Supporting the Ongoing Development of the Campus, also development plan policy SIC9 Further and Higher Education Facilities.
- Transitional zoned areas. The development site is bound by residentially zoned land to the west and south and an area to the south west with the zoning objective to preserve and provide for open space with ancillary active recreational amenities. Block F2 represents an overly abrupt transition between these land use zonings and would result in significant impacts on the visual and residential amenities of the area. Notes comments in observers' submissions regarding impacts on residential amenities; scale and massing of Block F2; dead frontage cutting off UCD from the surrounding neighbourhood. The Board's attention is drawn to photomontages 05 and 06 of the LVIA and the significant departure from height, scale and massing that Block F2 represents.
- The development does not impact on the Eastern Bypass reservation.

8.2.2. Retail

- The quantum and characterisation of the retail / retail services is acceptable having regard to development plan policies and sustainable travel considerations and will not adversely affect the established retail hierarchy of the county.

8.2.3. Residential, Living Environment and Dept. of Education Guidelines

- Policy RES12 supports the principle of on campus student accommodation subject to compatibility with surrounding residential amenity. Section 8.2.3.4 Additional Accommodation in Built Up Areas (xii) student accommodation indicates that on-campus is the preferred location for this use.
- Over concentration of student accommodation is not considered an issue in relation to residential amenity or sustainable development in light of the services available within the campus. The extension and consolidation of student housing within the campus in line with the campus development plan is considered positively.
- The development will provide a good quality of residential accommodation for future residents. All units appear to meet and exceed minimum standards provided in the Dept. of Education guidelines.

- The development has 62 no. studio units, which are not provided for in the Dept. of Education guidelines. Applicants suggest that there is a general acknowledged need for a range of accommodation types, including studios. The planning authority recognises the benefit of having a variety of accommodation types within the scheme.
- Considers that concerns about a homogenous design of the blocks are alleviated by the omission of Phase 3, as discussed below, and its replacement with an alternative architectural approach more in keeping with its receiving environment.

8.2.4. Local Area Plan

- Notes development plan objective to prepare a LAP for Clonskeagh / UCD, also the non-statutory UCD masterplan. Given that the lands are subject to the zoning objective 'To facilitate, support and enhance the development of third-level education institutions' and having regard to both the national context, in terms of the overall need for residential accommodation and the comprehensive suite of policies, objectives and overall guidance contained in the county development plan in relation to UCD, third level institutions in general and student accommodation, it is deemed entirely reasonable to adjudicate on this application in the absence of a statutory local area plan.

8.2.5. Height

- The development plan Building Height Strategy refers to the previous UCD masterplan, which considers 8-10 storey developments for student accommodation, subject to ensuring that there is no detrimental impact on the residential amenities of areas outside the campus. The principle of buildings of height within the campus is accepted and supported by the development plan subject to ensuring adequate protection of adjoining residential amenity.
- Block F2 will have a negative impact on the adjoining residentially zoned area and therefore should be omitted.

8.2.6. Shadow and Daylight

- The 'Shadow and Daylight Factor Analysis' submitted includes the statement "It is understood that the design is still under development ..." and the analysis pertains to average daylight factors to Block A units only.

- The study demonstrates that the development will not significantly impact on adjoining residential properties in terms of overshadowing.

8.2.7. Rationale of Blocks A and B to Roebuck Castle Estate

- The development submitted at pre-planning has been amended to change the massing and materials of the facades facing Roebuck Castle estate.
- The proposed 5-6 storey height with a separation distance > 30m between the facades of Blocks A and B and Roebuck Castle estate will ensure that no significant loss of visual or residential amenity shall occur at this location.

8.2.8. Blocks F1, F2 and F3

- Serious concern about significant negative impact on the setting and amenity of the protected structures. See comments of Conservation Division.
- The scale, height and massing of Block F2, located in a 'transitional zone', would significantly impact on the visual and residential amenities of property in the vicinity.
- Recommends that Blocks F1, F2 and F3 are omitted by condition in the event of a grant, i.e. omission of Phase 3 of the development in its entirety, to allow the area to be subject to a separate application for a development more in keeping with both the protected structures and the surrounding residential area. A different design approach would also allow for more variety in the overall scheme.

8.2.9. Car Parking

- The EIAR refers to the decommissioning of existing car parking (128 at the old running track and 177 at Merville / Glenomena student residences). It is assumed that the decommissioning of 177 spaces at Merville / Glenomena is in addition to the 120 displaced at this location. The development description does not explicitly refer to the decommissioning and removal of these spaces and no time frame is given for same. A condition should be attached requiring this decommissioning / removal prior to use of any of the new car parking areas, also stating that the 177 decommissioned in Merville are in addition to the 120 spaces displaced at this location.

- Car parking impacts of the omission of Phase 3. A total of 328 no. spaces will not be displaced. If Phase 3 is omitted, the Little Sisters (225 spaces) and the School of Law (100 spaces) car parks should also be omitted by condition.

8.2.10. Transportation Issues

- The development is consistent with development plan Smarter Travel objectives as it will (i) minimise the need to use cars and (ii) enhance the viability of public transport.
- The development is in accordance with development plan policy ST2: Integration of Land Use and Transportation Policies.

8.2.11. Financial Contributions

- Total gross floor area of Phase 3 is 72,671 sq.m. Due to the recommended omission of new surface car parking, the financial contributions apply to 27 no. surface car parking spaces in total.

8.2.12. Statement in Accordance with Section 8(5)(b)(ii)

- The development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would respect the existing character of the area and would be acceptable in terms of traffic safety and convenience.
Recommends permission on this basis.

8.3. **Other Technical Reports**

8.3.1. Surface Water Drainage

- No objection subject to recommended conditions.

8.3.2. Biodiversity Officer

- The Biodiversity chapter of the EIAR has addressed concerns raised at the pre-planning tripartite meeting. The site specific details requested for the CEMP have been provided. The CEMP also provides more detailed information in support of the screening for AA by the competent authority. Recommends conditions, including bat protection measures.

8.3.3. Conservation Division

- The Conservation Division is of the opinion that Blocks F1 and F2 are contextually misplaced.
- Does not agree with the EIAR assessment of visual impact as 'neutral'.
- Development by reason of its height / scale in close proximity to protected structures, particularly within their visual envelope, would seriously injure the architectural interest, visual and physical setting and appreciation of Roebuck Castle and Roebuck Glebe. Blocks F1 and F2 represent an unacceptable visual intrusion in to the character and setting of the protected structures. Development would therefore be contrary to the provisions of Part IV of the Planning and Development Act 2000 (as amended); development plan Policy AR1 and section 8.2.11.2 (iii) and section 13.5 of the Architectural Heritage Protection Guidelines for Planning Authorities.
- Recommends conditions.

8.3.4. Transport Planning

- Proposed decommissioning of 128 spaces in the running track car park brings the number of spaces down to that agreed in the Travel Plan.
- Revised proposal for a fully signalised junction at the temporary construction access from Fosters Avenue is acceptable.
- No concerns regarding the public realm works at Roebuck Road or the Eastern Bypass reservation, subject to incorporation of noise amelioration into the design of the development;

8.3.5. Housing Department.

- On campus student accommodation is exempt from Part V, ref. policy RES12.
- Recommends a condition requiring that any change of use from student accommodation to any other type of accommodation should be subject to a Part V condition.

8.4. **Recommended Conditions / Refusal Reasons in Accordance with Section 8(5)(b)(iii)**

- Recommended condition no. 2 requires the omission of Blocks F1, F2 and F3 in the interests of protecting the setting and amenity of the protected structures and of facilitating a revised design rationale to provide a bespoke 'site specific' building at this important location.
- Recommended condition no. 4 requires exclusion of proposed car parks at the Little Sisters and School of Law sites if Phase 3 is omitted by condition.
- Other conditions as recommended by the Drainage and Biodiversity reports. Conditions relating to the bat roost at Roebuck Castle are only to be imposed if Phase 3 is permitted. Other standard conditions relating to external finishes, management of construction works, landscaping and financial contributions.

9.0 **Prescribed Bodies**

9.1. The Opinion issued under section 6(7) advised the applicant to notify the following authorities in the event of the making of a SHD application:

1. Irish Water
2. Department of Culture, Heritage and the Gaeltacht (NPWS and Building Heritage Section)
3. Transport Infrastructure Ireland
4. National Transport Authority
5. An Taisce
6. Heritage Council

The applicant duly notified all of the above. One submission was received from Transport Infrastructure Ireland. ABP also requested a submission from the NTA under article 302(6)(b) of the Planning and Development (Strategic Housing) Regulations 2017.

9.2. **Transport Infrastructure Ireland**

9.2.1. TII has no observation to make in relation to the development.

9.3. National Transport Agency

9.3.1. The main points made are as follows:

- The NTA considers that the scale and use of the development are aligned with the 'Greater Dublin Area Transport Strategy 2016-2035'.
- The NTA have worked closely with UCD in the development of the UCD Campus Travel Plan 2016-2021-2026. The development is in line with the aspirations and assumptions set out in the travel plan, which is critical to ensure that the build out of the campus is completed in a phased and sustainable manner.

10.0 Planning Assessment

10.1. The following are considered to be the principal issues for consideration in this case:

- Principle of Development;
- Residential Design and Layout;
- Architectural Heritage Impacts;
- Visual Impacts;
- Impacts on Residential Amenities;
- Building Height;
- Parking;
- Other Transportation Issues;
- Site Services;
- Biodiversity;
- AA Screening;
- Part V;

These matters may be considered separately as follows.

10.2. Principle of Development

10.2.1. In terms of national policy, the Dept. of Education and Skills 'National Student Accommodation Strategy' (July 2017) states a primary objective to ensure that there

is an increase in supply of purpose built student rental accommodation in key urban areas. There is a target of the construction of at least an additional 21,000 student accommodation bedspaces by 2024. The subject proposal has been included in the number of planned bedspaces referred to in the strategy and would therefore advance the achievement of the stated target.

- 10.2.2. The development site is zoned Objective TLI “*To facilitate, support and enhance the development of third level education institutions*” under the current Dun Laoghaire Rathdown County Development Plan 2016-2022. The surrounding lands at Roebuck Castle estate, on Roebuck Road and south of the site are zoned residential A “*To protect and / or improve residential amenity*”. The site is also subject to the Specific Local Objective SLO1 Supporting the Ongoing Development of the Campus:

“To facilitate, support and enhance the development of University College Dublin including all associated and supporting facilities. A range of uses will be facilitated on Belfield campus lands to encourage and foster strong links between education, community and the business sector in the County.”

Development plan housing policy RES12: Provision of Student Accommodation states:

“It is Council policy to facilitate student accommodation on student campuses or in locations which have convenient access to Third Level colleges (particularly by foot, bicycle, and high quality and convenient public transport) in a manner compatible with surrounding residential amenities ...”

In addition, the provision of student accommodation on campus is prioritised in the hierarchy of priority set out in development plan section 8.2.3.4 (xii). The development is considered to be generally in accordance with these objectives, specific issues are considered in details below. I note in this regard that the submission of DLRCC states that the development is considered to be consistent with the development plan Core Strategy, the third level zoning of the site and with other development plan objectives relating to student accommodation and community facilities.

- 10.2.3. DLRCC has not yet commenced the preparation of a LAP for UCD / Clonskeagh, as provided for under SLO 146. The applicant’s statement of consistency notes that the LAP preparation process has not commenced and that a timeframe has not been

identified by DLRCC. The development has been designed with regard to the 'UCD Strategic Campus Development Plan 2016-2021-2026', which is recognised in development plan policy SIC9: Further and Higher Education Facilities. The following points of the campus development plan are noted:

- Section 3.3, the estates strategy, identifies a need for c. 3,000 additional student residence bedrooms bringing the total campus capacity up to c. 6,000 bedspaces.
- The provision of 3,000 additional student residence bedspaces and the refurbishment of Roebuck Castle are identified as priority projects as part of the 2016-2028 Campus Action Programme.
- The plan divides the campus into 3 'character areas', i.e. the Education, Research and Innovation Area; the Sports and Recreation Area and the Residential Area at the southern end of the campus, including the development site.

The applicant submits that the development is consistent with the campus development plan. It is therefore plan-led and is also consistent with national and development plan policy as outlined above. These points are accepted. It is submitted that the issue of prematurity pending the LAP does not arise in this context. This statement is supported in the DLRCC submission, which considers it reasonable to adjudicate on the application in the context of national and development plan policies on student accommodation, notwithstanding the absence of an LAP. I concur with this view.

10.2.4. The proposed use as visitor / tourist accommodation outside term time is in accordance with the definition of student accommodation provided under section 13(d) of the Planning and Development (Housing) and Residential Tenancies Act 2016 and is therefore acceptable in principle.

10.2.5. The proposed development is considered to be acceptable in principle on this basis.

10.3. Residential Design and Layout

10.3.1. The design and layout of the development have been considered with regard to the following national and local policy documents:

- The section 28 ministerial guidance document ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (2009) and the accompanying Urban Design Manual;
- The Design Manual for Urban Roads and Streets (DMURS), jointly issued by the Dept. of Transport, Tourism and Sport and the Dept. of the Environment, Planning and Local Government in 2013;
- The Dept. of Education guidance document ‘Guidelines of Residential Developments for 3rd Level Students Section 50 finance Act 1999’ (1999) and the subsequent supplementary document issued by the Dept. of Education in July 2005;
- Guidance provided in the Student Accommodation Scheme prepared by the Office of the Revenue Commissioners, May 2007.
- Dun Laoghaire Rathdown County Development Plan 2016-2022;
- UCD Strategic Campus Development Plan 2016-2021-2026.

10.3.2. Design and Layout

The development includes 6 no. student accommodation blocks (A to F), and the ‘Fulcrum Building’, a student activity centre with residential accommodation in the form of studio units on the upper floors. Blocks A to F contain apartments / Halls of Residence and each has a local ‘student hub’ with laundry facilities, lounge, function and study spaces.

The ‘Basis of Design Report’ submitted with the application provides a design rationale for the scheme. The individual blocks are clad in brick with varying amounts of clear / opaque glazing to achieve optimum natural light according to orientation. The student hub in each block has a curved form and a defined visual identity at ground level that distinguishes it from the apartment blocks. Coloured panels are used to differentiate between blocks and provide legibility to the building form. The development is laid out around a series of courtyards. These are envisaged as communal social / amenity spaces, with external access via archways and active frontages at the student hub in each block. Each courtyard has hard and soft landscaping with pedestrian routes and seating areas.

The scheme links with existing pedestrian connections between the Roebuck Castle pedestrian access and the main UCD campus, also with the adjoining existing Belgrove, Roebuck Hall and Merville student residences. There is a new pedestrian / cyclist route or 'shared corridor' from the Owenstown access, running to the west of the Fulcrum Building and Block D, to be used as the main pedestrian / cyclist route into and out of the campus, which is to be defined by additional signage and surface materials. The landscape and public realm strategy submitted indicates that the pedestrian routes are to be laid out as 'green streets' with exercise and play equipment between the residential blocks. A shelter belt of trees along the western site boundary shared with Roebuck Castle estate is to be enhanced and an existing woodland walk at this location is to be retained. Most of the student services, retail and commercial uses are located in the Fulcrum Building at the northern end of the site which contains an auditorium, a dining hall, social space, gym, health and wellbeing centre, shops, cafés and other services, with residential accommodation on the upper floors. This is located facing the campus ring road and close to the main academic and administration buildings of the campus. There is a large central civic and amenity space at the northern side of the Fulcrum Building fronted with active uses, which is to be used for events such as markets and shows. The area is designed as a shared space bisected by the ring road with traffic calming measures, to provide frontages to the Sutherland School of Law and the Quinn School of Business. Additional retail / commercial services are provided in Block A at the north eastern corner of the development and in Block F at Roebuck Castle. The development includes a multi-use external court and outdoor activity and passive amenity area on the eastern side of the site, at the entrance to Owenstown Park. Vehicular access is from the Owenstown Park campus access road, with a new alignment which bisects the development and links to the existing campus ring road and a new service area for deliveries and waste collection, located south of the Fulcrum Building. A secondary vehicular access from the campus ring road at the western side of the site provides an additional linkage between the Owenstown Park access road and the ring road, also serving the basement car park access / exit. There is a new taxi stop and set down area on the ring road at the northern site boundary, to be accessed via the existing N11 campus entrance, with a turning circle such that traffic entering the campus as far as this point can exit the campus via a

new laneway between the existing Merville student residence and proposed Block E. Access roads within the development are designed as shared, level surfaces with reduced traffic speeds to accommodate pedestrians. Most of the car parking is provided in the basement car park or the off-site surface car parks at the Little Sisters and School of Law sites. There are pockets of surface car parking, mainly disabled provision, at locations accessible to the courtyards and student hubs. This layout is intended to prevent the bulk of the traffic from entering the campus. There is ample cycle parking provision throughout the scheme.

The curved road layout and use of shared spaces, combined with traffic calming measures and varied paving / road surface to reduce overall traffic speeds are generally compliant with the principles of DMURS. The block frontages have a high solid to void ratio and are close to the street with off street parking areas and landscaping. In addition, there is a very high degree of pedestrian / cyclist permeability both within the scheme and to the adjoining campus and student residences. The development is therefore satisfactory in this regard, subject to the following notable exceptions:

- Several of the carriageway widths are in excess of the recommendations of DMURS section 4.4.1, e.g. the main 'loop' street is 7.5 m wide but should be 6.5m given that the predominant users of the campus are pedestrians and cyclists, as recommended for Arterial and Link Streets. Similarly, internal roads are 6 - 6.8 m wide but should be between 5 – 5.5 m, as recommended for Local streets.
- Not all junctions indicate crossing facilities, ref. section 4.3.2 Pedestrian Crossings and specifically fig 4.41.
- The junction between the realigned Owenstown Park access road and the main 'loop' road is indicated as a roundabout. This is not an ideal solution where pedestrian volumes are high. This junction should be revised as a raised table / shared surface or signalised junction.
- There should be footpaths on both sides of the Owenstown Park Entrance Road.

However, it is considered that these issues could be addressed by way of condition if permission is granted.

The proposed layout is also in accordance with the vision provided in the campus development plan, being located in the Residential character area. Section 4.3 of the plan provides that this area is to be developed as a series of residential courtyards, amenity spaces and leisure areas with new residential development integrated with the existing student residences by enhanced physical and visual connections for cyclists and pedestrians. Access to other transport modes for this area is to include cycle parking, set-down and pick-up areas, and strategically located surface and structured car parking. I consider that the layout achieves these objectives.

10.3.3. Residential Accommodation

The campus development plan provides for a mix of accommodation types to include both Halls of Residence and apartment style development, along with ancillary and support facilities including meeting places, social interaction and community uses.

The proposed breakdown of residential accommodation is as follows:

TABLE 1

| Block | Residential Accommodation | Bedspaces | GFA (sq.m.) | Amenity Fl. Area (sq.m.) | Height |
|----------------------|---|------------------|------------------------|-------------------------------------|---------------|
| A | 75 apartments (4/5/6/7/8 bed) | 478 | 15,246 | 814 | 5-10 storey |
| B | 67 apartments (4/5/6/7/8 bed) | 390 | 12,009 | 404 | 5-7 storey |
| C | 57 apartments (5/6/7/8 bed) | 386 | 11,970 | 637 | 5-7 storey |
| D | 49 apartments (6/7/8 bed) 12 Halls of Residence (12/14 bed) | 452 | 12,973 | 456 | 6-10 storey |
| E | 67 apartments (4/7/8 bed) | 412 | 12,023 | 452 | 5-7 storey |
| F | 111 apartments (6/7/8 bed) 12 Halls of Residence (10/12 bed) 2 studios | 828 | 25,604 | 915 | 6-10 storey |
| Fulcrum Bldg. | 60 no. studios | 60 | 8,353 | 3,371 | 7 storey |
| TOTAL | 512 apartments, including Halls of Residence and studios | 3,006 | 94,022 | 11,207 | |

The development may be considered with regard to the Dept. of Education guidance as follows:

TABLE 2

| Dept. Of Education Recommendation | Proposed Provision |
|---|---|
| Each unit to consists of minimum 3 bed spaces, maximum 8 bed spaces. | 62 no. studio units 24 no. Halls of Residence 512 no. 3-8 bed units. |
| Minimum GFA 55 sq.m., maximum GFA 160 sq.m. Study bedrooms to be arranged in units with a common entrance, access stairs and corridors and ancillary facilities. | All > 55 sq.m. 171 of the 7/8 bed units > 160 sq.m. Studio units 25.4 sq.m. |
| Provision of shared kitchen / dining / living room at a minimum of 4 sq.m. per bedspace. | This minimum standard is exceeded in all instances. |
| Single ensuite study bedroom 12 sq.m. Single disabled study bedroom with ensuite 15 sq.m. | This minimum standard is exceeded in all instances. |
| Circulation and storage provision. | This requirement is met. |
| Adequate amenity open space provision. | This requirement is met. |
| Communal facilities not > 12% of the total floor area. | This requirement is met. |
| Part M | Universal design statement submitted. |
| Bicycle storage provision. | This requirement is met. |
| Refuse storage provision. | This requirement is met. |
| Corridors not > 15m from 'landing' area. | This requirement is met. |
| No. of apartments per lift core not > 30. | This requirement is met. |
| Minimum 1 / 50 bedspaces designed for disabled. | This requirement is met. |

The 6/7/8 bed apartments have bedrooms designed to meet the standards of the student accommodation guidelines, i.e. > 9 sq.m. and including ensuite facilities. These are acceptable and there are adequate shared living / kitchen / dining facilities for these apartment types. The applicant submits that 171 of the 7/8 bed units exceed 160 sq.m. total floor area in order to comply with Part M of the Building

Regulations, this is acceptable. The Halls of Residence are described as ‘multi bedroom arrangements with living / dining spaces complimented by additional lounge areas and study rooms’. The proposed Halls of Residence in Blocks D and F are all 10 or 12 bed units. This type of accommodation is not included in the Dept. of Education guidance. I note that the kitchen / dining facilities for the Halls of Residence are limited relative to the number of bedspace units, however they are supplemented by communal kitchen and living facilities in the student hubs and by the provision of catering, community areas, etc. in the Fulcrum Building within the overall scheme. They are considered acceptable on this basis. I also note that the scheme includes 62 no. studio units, of a type also not provided for the Dept. of Education guidance. While the relevant statutory development plan is the Dun Laoghaire Rathdown County Development Plan 2016-2022, the Board may wish to consider policy on student accommodation as provided in the current Dublin City Development Plan 2016-2022 for reference on this matter. Section 16.10.7 of same states:

“Single / double occupancy studio units that provide en-suite bathroom facilities and kitchenettes / cooking facilities will also be considered, with a minimum gross floor area of 25 sq.m. and a maximum gross floor area of 35 sq.m.”

The proposed studio units have floor areas within these parameters. I consider them acceptable with regard to the above policy guidance and to the submission put forward by the applicant, i.e. that the Dept. of Education Guidelines date back to 1999 and that new student residences commonly feature studios as they are necessary to cater for the varied needs of a modern, diverse student population. In addition, I note that the studios are a minor element of the overall accommodation provision and that they would require planning permission to be let as or converted to permanent residential accommodation.

10.3.5. Residential Design and Layout Conclusion

Having regard to the above assessment, the proposed residential design and layout is generally satisfactory and in accordance with relevant policy guidance. I consider that the design provides a high level of amenity for residents of the scheme and will enhance the public realm of the wider UCD campus, particularly the plaza at the Fulcrum building and the outdoor games / activity area at the Owenstown Park

access. I would also comment in support of the proposed scheme that the existing student accommodation provided at the UCD campus appears to be of a high standard and well managed and that the applicant therefore has a proven track record of providing quality student accommodation.

10.4. **Architectural Heritage Impacts**

10.4.1. There are potential impacts on the settings of the protected structures Roebuck Castle and Roebuck Glebe and on the historic gate lodge Crannog Lodge, all of which are located within the Roebuck Castle complex on the southern side of the development site. This aspect of the development has been considered with regard to the Section 28 guidelines 'Architectural Heritage Protection – Guidelines for Planning Authorities.' (2011), in particular Chapter 13 of same, 'Curtilage and Attendant Grounds'.

10.4.2. Section 57 Declaration

DLRCC issued a Direction under section 57(2) of the Planning and Development Act 2000 (as amended) in respect of the Roebuck Castle protected structure on 9th May 2012, ref. DEC02/12. A copy of same is submitted with the application and is noted. It sets out works to the protected structures and to other structures within the Roebuck Castle complex, that may be carried out without planning permission.

10.4.3. Existing Roebuck Castle Complex

As noted in the EIAR, the historic Roebuck Castle complex is a distinct enclave within the wider UCD campus and has a very different character to the northern part of the development site. The complex is contained within high boundary walls with mature trees and a wooded embankment to the road reservation for the Eastern Bypass. It contains the following structures:

- Roebuck Castle and associated 2 storey 'west wing' stables, both to be retained. Roebuck Castle and the west wing are a protected structure (RPS Ref. 217) and are included in the Record of Monuments and Places, ref. DU022-017. The castle is a multi-bay, 3 storey structure in the Victorian gothic style, dating to 1874. It has been rebuilt many times since the 13th century. The existing castle was built on the site of an earlier mediaeval structure and incorporates elements of same. Modern extensions to the eastern side of Roebuck Castle are to be demolished.

Works to the existing castle and to the former stables are to be carried out in accordance with the S57 Declaration and will be restricted to repair and general upkeep.

- Southern courtyard containing several 2 storey ancillary buildings. The original buildings have been substantially altered. Not part of Roebuck Castle protected Structure. To be demolished to facilitate the development.
- Former Chapel building and convalescent home in a courtyard to the east of Roebuck Castle, dating to the 1950s. Not part of Roebuck Castle protected structure. To be demolished.
- Confucius Institute. A single storey standalone modern academic building on the eastern side of the complex, not a protected structure, to be demolished.
- 2 no. gate lodges at the Roebuck Road frontage. 'Roebuck Glebe' is protected structure (RPS ref. 236). It is the original gate lodge of Roebuck Castle and also dates to the renovations of 1874. The other gate lodge, 'Crannog Lodge', dates to the 19th century and is not a protected structure. Both lodges are in reasonable condition and are to be retained in residential use.
- Other outbuildings / yards at the Roebuck Road frontage and on the southern side of the complex are to be demolished.
- Stone wall along the eastern boundary of the complex with mature trees within the development site, to be retained.

10.4.4. Proposed Phase 3 Works at Roebuck Castle

Aside from the above works, Phase 3 of the overall scheme involves the construction of Blocks F1, F2 and F3 at Roebuck Castle as follows:

- Block F1 to the east of the castle and the retained stable wing, with a new courtyard between the structures. Up to 8 storey.
- Block F2 to the south of the castle and close to the Roebuck Road frontage. A 'C' shaped structure with a central courtyard. The northern end of Block F3 is to connect to the end of the stable wing of the castle. Up to 8 storey.
- Block F3. Standalone block between the castle and the Roebuck Hall residence. Up to 10 storey.

- New pedestrian access and boundary to Roebuck Road, provision of surface car parking to the front and side of the castle and to the north of Block F3.

The submitted 'Basis of Design Report' and the applicant's response to the pre-planning Opinion provide a rationale for the design of Blocks F1, F2 and F3. While the castle and the west wing are to be retained, it is submitted that the other buildings constructed or heavily remodelled at the complex since 1943 detract from the protected structures and are not of architectural merit themselves. The proposed Blocks F1, F2 and F3 are to be a composition of modern structures to frame the setting of the castle and recreate a courtyard environment. The blocks are set back to ensure that the setting of the castle is respected. It is submitted that the height matches that of the existing building at this location and is in keeping with the scale of the castle. The palette of materials is revised from the pre-planning proposal and has been designed to reflect the colour of the castle. The works at the Roebuck Road frontage are intended to create an open and welcoming interface to the road with seating and planting and to provide a context for Roebuck Glebe and Crannog Lodge in a new plaza space. While it is acknowledged that the 7 storey scale of Block F2 is much greater than the cottages, it is submitted that this is an opportunity to create a landmark to declare the presence of the university at this location and that it is not appropriate that new development should match the scale of the cottages. The elevational treatment of Block F2 has been amended in view of comments by ABP and DLRCC at pre-planning, such that a vertical stair core feature has been omitted and there is a new emphasis on the pedestrian 'gateway', also a new boundary treatment to increase visibility and increased footpath / landscape amenity space to Roebuck Road.

10.4.5. EIAR Assessment of Architectural and Cultural Heritage Impacts

EIAR Chapter 15 deals with architectural and cultural heritage impacts and is prepared by a Conservation Architect. The buildings to be demolished are modern additions to the complex and are not considered to be of any significant heritage interest. A total of 4 elements of the complex are identified as of historic significance, i.e. the protected structures, Crannog Lodge and a stone wall along the eastern boundary, which is a remnant of the historic landscape. The development will impact on all 4 elements. The impacts identified may be summarised as follows:

- Impacts on the setting of Roebuck Castle. The new buildings are c. 12 m away from the castle and of similar height. The elevational treatment has a neutral palette to reflect the tone of the castle. The assessment considers that the development therefore allows for a better setting for Roebuck Castle. Residual impacts are identified as neutral, moderate and permanent.
- The stone wall is to be retained with minimal impacts. Residual impacts are identified as neutral, slight and long-term.
- Impacts on the settings of Roebuck Glebe and Crannog Lodge. The development is located 15-20 m from these buildings. Both are currently screened by boundary walls. The development would remove these boundaries and the existing semi-derelict buildings, yards and other structures in the vicinity. This would increase their visibility and improve the relationship between them. The development provides an opportunity to create a public space in this part of the site across which Roebuck Glebe and Crannog Lodge could be read as a set-piece. The EIAR acknowledges:

“The juxtaposition of the contrasting scales is challenging in terms of balancing the protection of the setting and context of the cottages with the demands of a progressive University Campus.”

Residual impacts on both buildings are identified as neutral / negative, significant / moderate and permanent.

The EIAR states that the design of the original scheme has been amended to address the issues raised in the pre-planning Opinion issued by ABP. It concludes that a balance must be struck between the demands of the architectural heritage of the site and the need for development that is of a scale necessary for the satisfactory utilisation of the resources of the University. The EIAR identifies residual impacts on the overall setting of the 4 historic elements as neutral, moderate and permanent.

10.4.6. Conservation Report

A report on the development by a Conservation Architect is submitted with the application. This repeats many of the issues raised in the EIAR, as discussed above. It endorses the EIAR conclusion that the overall impact of the development, when mitigation measures are taken into account, is moderate, neutral and permanent.

The report concludes that the overall impact of the development is neutral, significant and long term.

10.4.7. Architectural Heritage Impacts Assessment

Having inspected the development site on several occasions and having considered the detailed elevations and layouts of Blocks F1, F2 and F3 and with regard to the applicant's response to the pre-planning Opinion, the EIAR including the Landscape and Visual Impact Assessment (LVIA), the Conservation Report, the submitted 3D model, relevant national and local policy provisions, the submission by DLRCC and the observers' submissions, I consider the following with regard to architectural heritage impacts.

I accept the conclusion of the EIAR and the applicant's Conservation Report that the demolition of later additions to the Roebuck Castle complex that are not part of the protected structure would not have significant heritage impacts and that it presents an opportunity to create an improved setting for the historic buildings in this part of the site. The proposed demolition and redevelopment are therefore considered to be acceptable in principle.

However, I do not agree with the EIAR assessment that impacts on the setting of Roebuck Castle would be 'moderate' and 'neutral'. The development would undoubtedly have a significant impact on the setting of the castle. While it is accepted that a modern architectural style can provide a sympathetic and complementary setting for a protected structure, this is not considered to be the case for the subject proposal. Blocks F1, F2 and F3 are a reproduction of the architectural style, scale and elevational treatment of Blocks A to E in Phases 1 and 2 of the scheme. A site specific design created with regard to the unique context of Roebuck Castle would be more appropriate in my view. I note in particular the elevations of Block F2 which clearly indicate the contrasting scale and design of the development in comparison to Roebuck Castle and its adjoining stable wing. While I accept that the context of the castle has already been changed by the modern 6 storey Roebuck Hall student residence to the east, the subject proposal presents a far more dramatic contrast in bulk and scale.

The EIAR identifies residual impacts on Roebuck Glebe and Crannog Lodge as neutral / negative, significant / moderate and permanent. I agree that the retention of

the stone boundary wall and trees and the removal of existing outbuildings and yards present an opportunity to increase the visibility of these buildings, to enhance their settings and to create a new relationship between the lodges and the public realm. However, the design and scale of Block F2 at this location visually overwhelm the gate lodges and do not provide a sympathetic context.

I note the planning and conservation analyses provided in the DLRCC submission, as summarised in above section 8.0. These state serious concerns about significant negative impacts on the setting and amenity of the protected structures. The report of DLRCC Conservation Division does not accept the EIAR assessment of impacts as 'neutral' and comments as follows:

"The proposed development in our professional opinion would be negative, significant and long term and therefore we cannot support the proposal known as Phase 3 works"

Also:

"The removal of later non-significant additions and ancillary buildings presents a great opportunity to enhance the setting, amenity and presence of Roebuck Castle, however the proposed development fails to grasp this once in a lifetime window of opportunity to provide a bespoke 'site specific' building in preference for achieving a homogenous design throughout the student residences; so similar that colour coding is required to help distinguish them from one another. Other means for architectural treatment, form, materials, scale could have been employed at certain locations which presented more challenging constraints such as the presence of Protected Structures on the site. A 'one fits all solution' is not in the interests of the built heritage of the site. We continue to hold the opinion that the scale is wholly inappropriate next to Roebuck Castle and will have an over-powering over-bearing impact on the setting, amenity and appreciation of Roebuck Castle and Glebe."

The planning authority recommends that Blocks F1, F2 and F3 are omitted by condition in the event of a grant of permission.

To conclude, based on the above assessment I am of the view that Phase 3 of the development would have a significant adverse impact on the settings of the protected structures Roebuck Castle and Roebuck Glebe and on the setting of the historic building Crannog Lodge. It would therefore contravene development plan

policy AR1: Record of Protected Structures, i.e. the protection of structures included on the RPS from any works that would negatively impact their special character and appearance.

10.5. Visual Impacts

10.5.1. There are no specific development plan objectives relating to the preservation of any views or prospects in the vicinity. The development site context is primarily 2 storey suburban housing at Roebuck Road to the south and west of the site and higher academic and residential buildings up to 6-7 storeys within the UCD campus. Thus there are two very different contexts to be considered. Potential visual impacts primarily relate to locations at the UCD campus, at the Roebuck Castle estate to the west of the site and at Roebuck Road, Ardilea and other residential areas to the south. These impacts may be considered as follows with regard to the LVIA provided in EIAR Chapter 11, which includes photomontages from 19 no. locations in the vicinity. Having inspected the site and the surrounding area, I am satisfied that the photomontage locations used in the LVIA are a reasonable representation of likely visual impacts in all directions. I note the observers' comments that the photomontages indicate summer vegetation, which may minimise potential visual impacts. However, site visits were carried out in November and December in the course of this assessment and relevant photographs are enclosed.

10.5.2. Visual Impacts on UCD Campus

This area of the campus has an open character as the northern part of the development site is currently in use as playing fields and surface car parking. Any development of the site will result in a change to this character. Photomontages nos. 1, 2, 3, and 4 indicate existing and proposed views from within the campus. The EIAR assesses visual impacts at these locations as generally moderate / significant and neutral.

I consider the likely visual impacts on the UCD campus to be generally acceptable in the context of a modern, evolving academic campus. The EIAR identifies a potential impact associated with the evolution of the former demesne landscape from which the campus is derived and the urban, residential character of the development. However, as discussed above, the plaza at the Fulcrum building and the outdoor games area at Owenstown Park, along with the proposed landscaping, will enhance

the public realm of the campus and visual impacts are considered to be positive overall. There is potential for cumulative impacts in relation to the 3 storey Confucius Institute, which is currently under construction, also a planned extension to the Quinn School of Business to the north of the development site. However, given that these developments are relatively modest in scale and that the proposed development is considered to be generally in keeping with the character of the UCD campus, it is considered that significant cumulative impacts would not arise. It is also considered that visual impacts of the proposed car parks at the Little Sisters and School of Law sites would be limited to within the UCD campus and are appropriate in this context.

10.5.3. Visual Impacts on Roebuck Castle Estate

Several existing buildings are currently visible in views of the campus from Roebuck Castle estate, primarily the Roebuck Castle complex and the Roebuck Hall student residence. There is a belt of mature deciduous trees on the campus side of the shared boundary which provides some visual screening at present, even during the winter months. This is to be retained and enhanced within the development.

Photomontages nos. 8, 9 and 10 indicate views of the development from within Roebuck Castle estate. The EIAR assesses impacts on views nos. 8 and 10 are assessed as 'slight and neutral' and on view no. 9 as 'significant and negative'.

The development will undoubtedly have a substantial visual presence in views from Roebuck Castle estate, particularly Blocks A, B and C of Phase 2. The following mitigating factors are noted:

- Blocks A and B are at distances of 30-60 m from Roebuck Castle estate. The distance of the closest part of Blocks A and B to the face of the nearest house within Roebuck Castle estate is 30.74m. The 22m distance cited in the 'Sustainable Residential Development in Urban Areas Guidelines' is exceeded in all instances.
- Blocks A and B face the side gables of houses within Roebuck Castle estate at an oblique angle rather than directly facing front / rear elevations.
- The design of Blocks A and B has been amended from that submitted at pre-planning to reduce visual impacts. The revised elevations facing Roebuck Castle estate have an increased vertical emphasis.

- The intervening tree belt within the UCD campus is to be retained and supplemented. There is additional existing vegetation on the Roebuck Castle estate side of the boundary. These still provided a significant amount of visual screening when the site was inspected in November and December.
- The elevations of Blocks A, B and C closest to Roebuck Castle estate have been reduced to 5-6 storey height to ameliorate visual impact. The top floors have been set back to reduce bulk and visual impact. The development has a lower floor level than that of the adjacent houses within Roebuck Castle estate, reducing the relative height difference.
- The submission of DLRCC comments that Blocks A and B will not result in any significant loss of visual or residential amenity at this location.

On balance, given that any development of this part of the campus would change the aspect from Roebuck Castle estate, the visual impact at this location is considered acceptable.

10.5.4. Visual Impacts on Roebuck Road, Ardilea and other Residential Areas to the South

The issue of visual impacts on Roebuck Road and on the residential areas of Ardilea and The Palms on the southern side of Roebuck Road is one of the most contentious aspects of the scheme and is repeatedly raised in the observers' submissions as summarised in Appendix I. The Roebuck Road frontage of UCD is currently defined by a high wall with mature deciduous trees, such that the wider campus is not visible from the road. The gate lodges Roebuck Glebe and Crannog Lodge are partially visible and the existing pedestrian entrance has an unobtrusive presence. Proposed works to this frontage include a new pedestrian entrance to the campus, signage, replacement of the existing boundary wall and footpath widening. In addition, Block F2 would present a 7 storey frontage at this location, with an archway to provide the new pedestrian access (see contextual elevation M-M, ref. drawing no. 3.1_314 and the applicant's response to the pre-planning Opinion). There is a setback of c. 12-20 m between the front of Block F2 and the Roebuck Road boundary.

Photomontages nos. 5, 6 and 7 indicate views from Roebuck Road, including the proposed new boundary, footpath and pedestrian entrance. The EIAR assesses

impacts at views nos. 5 and 7 as 'significant and neutral' and view no. 6 as 'significant and negative'.

The pre-planning Opinion issued by ABP advised the applicant that the Roebuck Road frontage of the development may require further consideration or amendment, particularly with regard to impacts on the public realm. The subject proposal does not satisfactorily address this requirement in my view. I agree with the observers' submission and the DLRCC comment that Block F2, located in a 'transitional zone' at the boundary between the campus and residentially zoned areas, would significantly impact on the visual and residential amenities of property in the vicinity. As discussed above, Phase 3 is a continuation of the architectural style, scale and elevational treatment of Blocks A to E in Phases 1 and 2 of the scheme rather than a site specific design that responds to the opportunity to create a new interface between UCD and the public realm at Roebuck Road. I note in this regard that the provision of an upgraded pedestrian entrance at this location is identified as an objective in the current campus travel plan. While it is desirable that the university should have a strong visual presence to Roebuck Road, this should take the form of a high quality, integrated design that includes an active frontage, new campus boundary, new pedestrian access to the campus and landscaping including the retention of existing mature trees where possible.

10.5.5. Construction Visual Impacts

Potential impacts during the construction phase are generally limited to the temporary entrance from Fosters Avenue. While the development is to be constructed over a 10 year period, these impacts are essentially temporary in nature and, as set out in the EIAR, may be mitigated through appropriate construction environmental management measures.

10.5.6. Visual Impacts Conclusion

10.5.7. The design and scale of the development are acceptable in the context of the evolving UCD campus. While the development would change the outlook from within Roebuck Castle estate to the west, the overall visual impact at this location is considered acceptable with regard to the factors discussed above. However, Phase 3 of the development would have an adverse visual impact on Roebuck Road and on residential areas to the south of the site. In particular, it is considered that the design

and layout of Block F2 would not be in accordance with the following guidance on 'transitional zones' provided in development plan section 8.3.2:

" ... it is important to avoid abrupt transitions in scale and use in the boundary areas of adjoining land use zones. In dealing with development proposals in these contiguous transitional zonal areas, it is necessary to avoid developments which would be detrimental to the amenities of the more environmentally sensitive zone. For instance, in zones abutting 'residential areas' or abutting residential development within mixed-use zones, particular attention must be paid to the use, scale and density of development proposals in order to protect the amenities of these residential properties."

10.6. Impacts on Residential Amenities

- 10.6.1. Aside from visual impacts, potential impacts on residential amenities relate to overlooking, overshadowing and the proposed lighting scheme.
- 10.6.2. Potential for overlooking arises at Roebuck Castle estate to the west of the development and at the residential areas to the south of the site. The facades of Blocks A, B and C are set back 30-60 sq.m. from individual residential properties within Roebuck Castle estate. This intervening distance, along with the presence of screening vegetation, is considered adequate to prevent adverse impacts by way of overlooking to residential properties to the west. The closest residential properties to the south are nos. 55-60 The Palms and at the entrance to Louvain within Ardilea. The southern façade of Block F2 is generally 50-60 m from the established building line. The closest building to Block F1 is 61 The Palms, which has an intervening distance of 33.6 m to the side elevation of the dwelling. These distances would obviate significant overlooking. In addition, there is a strong line of mature vegetation along the frontage of The Palms and at the gardens of properties within Ardilea, which screens these properties from the public road. On this basis, it is considered that the development would not result in any significant adverse impact on residential amenities by way of overlooking.
- 10.6.3. The application includes a 'Shadow and Daylight Factor Analysis'. This indicates potential overshadowing for the existing situation and the proposed development on 21st March, 21st June and 21st December, for morning, afternoon and evening at each date. The analysis indicates that the development would not result in significant

overshadowing of residential properties to the west of the site within Roebuck Castle estate.

10.6.4. The proposed lighting scheme has been designed to prevent overspill outside the site. Additional requirements may be imposed by condition if permission is granted.

10.6.5. It is considered on this basis that the development would not result in any significant adverse impacts on residential amenities by way of overlooking, overshadowing or light overspill.

10.7. Building Height

10.7.1. Development plan Appendix 9 sets out the building height strategy for the county. Section 4 of the strategy sets out a policy approach based on a rationale that tall buildings can be accommodated in a number of key areas in the county, including UCD Belfield, which is considered to be 'self selecting' on the basis that it is a major national institution. Taller buildings will generally not be considered outside of these locations. Section 4.1.7 of the strategy refers to the previous 'UCD Campus Development Plan 2005-2010-2015', which referred to building heights up to 8-10 stories for student accommodation developments. Section 5 of the strategy, 'General Principles', includes a principle to promote higher densities and allow for increased building heights around public transport nodes and centres of activity, also a principle to allow landmark buildings at certain locations as designated in a LAP/ Urban Framework Plan / SDZ process.

10.7.2. Section 4.3 of the current campus development plan provides that building height in the Residential character area of the campus is to respect the sensitive nature of campus boundaries and the amenity of adjoining developments. It states:

"The height of future residential buildings will be considered carefully to address sustainable land-use; the site specific location, boundary sensitivities, and the need to promote wayfinding and the creation of a greater sense of place. The height and massing strategy for future buildings in the Character Area will provide for a transition in scale to the neighbouring properties ..."

Appendix 2 of the strategy, 'Potential Future Building Locations and Building Heights' states:

“It would be unsustainable to continue to develop the Belfield Campus with 1-2 storey buildings. Generally, 5-10 storey residential developments for student accommodation will be considered depending on location while up to 6 storeys will be considered for educational buildings.

There is potential for landmark buildings at Belfield, for example at the Stillorgan Road (R138) campus entrance and the redevelopment of the science precinct ... “

Appendix 2 includes a map ‘Existing and Potential Future Building Heights at Belfield’, which indicates locations within Phases 1 and 2 as suitable for 8-10 storey buildings, also the Phase 3 / Roebuck Castle area of the site.

- 10.7.3. As noted above, the current context of the development site is up to 6-7 storey within the UCD campus and 2 storey residential to the west and south. There is also a 6 storey apartment building nearby to the south east, at the junction of Fosters Avenue and Roebuck Road. The proposed heights of up to 10 story within Phases 1 and 2 of the development are in accordance with the guidance provided in the campus development plan and, with regard to the above analysis, are not considered to have any adverse impact on visual or residential amenities. According to the current campus development plan, similar heights are acceptable in principle at the Roebuck Castle area of the development site. However, the proposed 6-10 storey Blocks F1, F2 and F3 in Phase 3 of the scheme are considered to have adverse impacts on the settings of the protected structures in the Roebuck Castle complex and Block F2 is considered to have an adverse visual impact at the Roebuck Road frontage of the site. Therefore, while heights of up to 8-10 storeys are acceptable in principle at this part of the site with regard to the DLRCC Building Height Strategy and to the campus development plan, the height of this element of the proposed development is not acceptable at this location.

10.8. **Parking**

- 10.8.1. The observer submissions state concerns about the quantum of parking provided and that the development would generate demand for off street parking in nearby residential areas.

10.8.2. UCD Campus Travel Plan 2016-2021-2026

Development plan Specific Local Objective SLO148 – Car Parking states:

“To identify and address the on-going car parking issues within and surrounding UCD campus. In particular, the Council will support and facilitate the on-going process of Mobility Management Planning for UCD, involving the University and the NTA, in order to achieve more sustainable travel patterns to and from the University and to work towards the development of a Campus Travel Plan.”

The UCD Strategic Campus Development Plan 2016-2021-2026 has been adopted in accordance with SLO148. It provides for an increased staff and student population of up to 35,000. It includes targets and objectives for increased use of sustainable travel modes such that the sustainable mode share is increased from 77% to 81% by 2026, in line with national policy set out in ‘Smarter Travel: A Sustainable Transport Future’ and regional policy in the Greater Dublin Area Transport Strategy 2016-2035. This is to be achieved by modest improvements in public transport, along with increases in walking and cycling and the demand management associated with the 3,000 additional student bedspaces provided for in the subject development. The provision of these bedspaces is a key element in campus development plan measures to reduce commuting and parking demand at the campus.

Car parking demand management measures have been in place at the UCD campus since 2015, with a current provision of 3,558 no. car parking spaces of which 3,042 are allocated to daily commuting and 330 no. ‘pay and display’ visitor spaces. Car parking at the campus is currently managed over 6 traffic cells with barriers to control traffic between cells, prevent rat-running and distribute the traffic impact across each of the campus entrances. The development site is located within the Owenstown Cell, along with existing student residences. The travel plan includes the following specific parking objectives:

- To continue to manage car parking demand and levels of parking provision at campus level.
- To accommodate planned increases in the campus population while maintaining the number of parking spaces within a ‘commuting impact’ at existing levels or reduce where possible.
- To provide a limited number of managed, dedicated long term ‘car storage’ parking spaces for student residences on campus.

- To increase the quantum of managed (i.e. pay and display) visitor parking in each traffic cell (total of approx. 150 spaces across campus) to encourage a high turnover of spaces and discourage commuter parking.
- It has been agreed through the UCD Commuting Review Group, with includes DLRCC and the NTA, that the campus would require a maximum total of 3,568 car parking spaces in 2026. This maximum assumes the implementation of external transport schemes that will provide alternatives to the private car for commuting to and from UCD.
- Existing car parks within the campus are to be replaced with a smaller number of managed car parks located at the campus periphery, with structured parking to be integrated with new developments including student accommodation, as part of a holistic approach to car parking and the enhancement of the campus core as a high quality pedestrian zone.

10.8.3. Proposed Car Parking Provision

The proposed changes to the overall car parking provision at the campus are as follows (after Table 6.1 in the 'Civil Engineering Infrastructure Report' and EIAR Table 12.2):

TABLE 3

| Car Park Name | Existing | Displaced | Remaining | Additions / Reductions | Total Spaces |
|-----------------------------------|--------------|-------------|--------------|---------------------------|-----------------|
| Owenstown Cell | | | | | |
| O1 Magnetic Observatory | 87 | 0 | 87 | - | 87 |
| O2 Little Sisters | 61 | 0 | 61 | +225 | 286 |
| O3 Sutherland A | 72 | -72 | 0 | - | 0 |
| O4 Sutherland B | 314 | -314 | 0 | - | 0 |
| O5 Merville & Glenomena | 201 | -20 | 181 | -177 | 4 |
| O6 Roebuck Residences | 75 | -75 | 0 | - | 0 |
| O7 Roebuck Offices | 10 | -10 | 0 | - | 0 |
| O8 Roebuck Legal Education | 33 | -33 | 0 | - | 0 |
| O9 Roebuck Rear | 69 | -69 | 0 | - | 0 |
| O10 Roebuck Side and Glebe | 55 | -55 | 0 | - | 0 |
| O11 Ashfield Residences | 86 | -86 | 0 | - | 0 |
| Other spaces beside buildings | 18 | 0 | 18 | - | 18 |
| New basement car park | 0 | 0 | 0 | +637 | 637 |
| New School of Law car park | 0 | 0 | 0 | +100 | 100 |
| New surface parking Block A, B, C | 0 | 0 | 0 | +18 | 18 |
| New surface parking Roebuck | 0 | 0 | 0 | +60 | 60 |
| New surface parking Block E, D | 0 | 0 | 0 | +9 | 9 |
| Owenstown Total | 1,081 | -734 | 347 | 872 | 1,219 |
| Richview Total | 148 | 0 | 148 | - | 148 |
| Clonskeagh Total | 1,090 | 0 | 1,090 | - | 1,090 |
| Nova Total | 124 | 0 | 124 | - | 124 |
| Rosemount Total | 29 | 0 | 29 | - | 29 |
| R138 cell (former running track) | 1,086 | 0 | 1,086 | -128 | 958 |
| UCD Campus Total | 3,558 | -734 | 2,824 | 744 | 3,568 |

As indicated, the development includes a new basement car park below Blocks A, B and C (637 spaces), along with 32 no. accessible spaces at surface level, an additional surface car park adjacent to the Sutherland School of Law (100 spaces) and an extension to the existing Little Sisters car park (225 spaces). The scheme will result in the displacement of existing surface car parking at the development site. It is also proposed to remove 177 no. existing surface car parking spaces at the Merville and Glenomena student residences and 128 no. spaces at the former UCD running track, both outside the development site. The Civil Engineering Infrastructure Report submitted with the application notes that parking areas at Merville and Glenomena residences are specifically identified by UCD as areas that would significantly benefit from the removal of car parking, as it would present an opportunity to improve amenities and pedestrian / cyclist facilities in the residential courtyards. These changes will result in a net increase of 138 spaces within the Owenstown cell, to be offset by the decommissioning of 128 spaces in the R138 cell, with a net increase of 10 spaces at the overall UCD campus. The total no. of car park locations will reduce from 12 to 8.

The student residence spaces are to be managed such that they are not accessible to staff / students or other visitors to the campus. Visitor parking is to be managed to ensure a high turnover of spaces. A total of 56 no. disabled car parking spaces are to be provided, comprising 5 spaces at the Sutherland School of Law car park; 12 spaces at the Little Sisters car park; 35 spaces at various locations throughout the student residence blocks and 4 spaces at the Merville / Glenomena residences, in addition to the retention of existing disabled parking provision at these locations. This equates to 5% of the quantum of parking provided and is satisfactory.

The proposed parking provision is to be phased as follows (as per parking phasing map provided in the submitted Civil Engineering Infrastructure Report):

TABLE 4

| Phase | New Spaces | Decommissioned | Net Gain / Loss | Live Campus Total |
|----------------------|---|---|-----------------|-------------------|
| Baseline 2017 | | | | 3,558 |
| Phase 1 2018-2020 | Little Sisters 225 School of Law 100 Block D & E disabled 9 Total +334 | Sutherland -250 Merville / Glenomena -20 Total -270 | + 64 | 3,622 |
| Phase 2 2020-2023 | Basement car park 637 Blocks A & C disabled 18 Temporary relocation 297 Total +952 | Sutherland -136 Merville / Glenomena -177 Roebuck residence -75 Ashfield residence -86 Temporary relocation -297 Running Track -79 Total -850 | 102 | 3,724 |
| Phase 3 2023-2025 | Block F parking 60 Total +60 | Roebuck Castle -167 Running track -49 Total -216 | -156 | 3,568 |

10.8.4. Cycle Parking

The proposed cycle parking provision is c. 2,104 no. spaces, to be provided on the basis of 1 per 2 bedspaces. Secure cycle spaces are to be provided in the basement car park (510 no. spaces) and at surface level in areas within the public realm, close to the student residences. Cycle parking provision at the campus is currently monitored by UCD and this would continue to be the case. This provision is satisfactory.

10.8.5. Parking Assessment

The development effectively results in the rationalisation and consolidation of existing parking provision at the UCD campus, without any significant additional parking spaces. This is generally in accordance with the provisions of the UCD

Campus Travel Plan 2016-2021-2026. As noted, the provision of over 3,000 additional student bedspaces on campus is a key element of the travel plan, as part of a suite of measures to mitigate the travel demand created by an increasing campus population, which includes improved use of public transport, walking and cycling. The proposed phasing is also compliant with the projected parking figures in the UCD travel plan, section 5.6.4 of which envisages an overall increase of 166 no. car parking spaces up to 2021 with the increase mainly in the Owenstown cell, i.e. a total provision of 3,724 spaces. It also complies with the agreed maximum total of 5,568 spaces in 2026, as discussed above.

I note the Observers' concerns regarding overspill parking in the residential areas around the campus. There is metered on-street parking at Owenstown Park at present and uncontrolled parking in the residential areas to the west and south of the development site, i.e. Roebuck Castle estate, Ardilea and The Palms. Both site inspections were carried out on weekday mornings during the academic term. I did not note any significant amount of uncontrolled on-street parking in these areas during either site inspection. The management of on-street parking in the area is a matter for DLRCC and I note development plan policy ST19: Travel Demand Management, which aims:

"... to implement Travel Demand Management measures aimed at reducing the demand for travel and increasing the efficiency of the transport network with due consideration given to the effect of parking controls on nearby residential roads."

Such measures, as listed in development plan section 2.2.9.1, include restrictions on car parking provision at key destinations to encourage public transport use. I also note that section 5.1 of the campus travel plan recommends the continued implementation of managed parking in surrounding residential areas. These measures are available if such issues arise as a result of the development.

The DLRCC submission considers the parking provision to be generally acceptable, subject to a condition relating to the timeframe for the decommissioning of 177 no. spaces at Merville and Glenomena student residences. The planning authority also suggests a revision to the proposed phasing if Phase 3 of the development is not permitted, such that the proposed Little Sisters car park (225 spaces) and School of Law car park (100 spaces) are both omitted to balance the retention of spaces that

would be displaced in Phase 3. However, given that Phase 3 would involve the decommissioning of a total of 216 no. spaces (see Table 4 above), I recommend that only the Little Sisters car park is omitted. This would result in a total decrease of 9 no. spaces from the parking provision for Phases 1 and 2 but it is considered that this figure would not have a significant material impact on the overall parking situation at the UCD campus.

I consider the proposed parking provision to be acceptable on this basis.

10.9. Other Transportation Matters

10.9.1. Aside from parking, there are several transportation issues to be addressed, which may be considered separately as follows.

10.9.2. Roads Layout

The roads layout within the development is discussed in above section 10.3.2. The following additional road works are proposed:

- Realignment of the access road from Owenstown Park, to include a pedestrian crossing and a new bus stop and set down area. To be designed as a shared, level surface.
- Replacement of an existing signalised junction within the campus where the Owenstown access road meets the campus ring road with a priority junction. New shared space incorporating the junction.
- Proposed new car parks at the Little Sisters and School of Law sites.
- Works to the widen the existing public footpath on Roebuck Road.

The proposed works are in accordance with DMURS standards and have been subject to a Road Safety and Quality Audit, which is submitted. The Transport Planning section of DLRCC states no objection subject to conditions. The works are acceptable on this basis.

10.9.3. Traffic Impacts

The UCD campus is divided into 3 main traffic cells, i.e. the Owenstown Park cell, the R138 cell and the Clonskeagh cell. There are barriers to control movement through the campus at peak times, restricting movements to within each of the cells. The development is located within the Owenstown Park cell and, as outlined above,

will be accessed from the Owenstown Park / Fosters Avenue entrance to the campus. The EIAR details existing travel patterns at the campus, based on a campus cordon travel survey carried out by UCD in 2015/16. This found an overall mode share for staff and students of 25% private vehicle; 41% public transport (bus and rail); 20% bicycle; 13% on foot. The student demographic has a car travel mode share of 16%. There has been a general trend of increased travel distances and journey times in recent years. The EIAR concludes that the development is anticipated to have a positive traffic impact overall as it will reduce commuter movements to and from the campus by increasing the proportion of the student population living on site. It will also cater for the significant increase in student population preventing associated traffic impacts in the surrounding residential areas. The development will effectively remove the commuter peak demand for 3,006 students. Ongoing traffic and transport monitoring is to be carried out by UCD. These points are accepted. I also note the NTA comments that scale and use of the development are aligned with the 'Greater Dublin Area Transport Strategy 2016-2035' and with the aspirations and assumptions of the campus travel plan.

10.9.4. Proposed Dublin Eastern By-Pass Reservation

The development plan includes a long term roads objective for the Dublin Eastern Bypass, as identified in the 'Dublin Eastern Bypass Corridor Protection Study' (2011). An indicative route is shown in development plan map T3 but the exact horizontal or vertical alignments of the road have not been finalised. The existing Roebuck Hall student residence lies between Phases 1 and 2 of the development and the road reservation but Phase 3 immediately adjoins an embankment between the Roebuck Castle complex and the corridor. Commencement of the Eastern Bypass is not provided for within the life span of the GDA Transport Strategy up to 2035. However, according to the corridor protection study, development is not to be permitted within the corridor where it would jeopardise the deliverability of the motorway. Development plan SLO6 Eastern By Pass Corridor Provides:

"To promote potential additional future uses of the Dublin Eastern Bypass reservation corridor, including a greenway-cycleway, a pedestrian walkway, biodiversity projects, recreational opportunities - inclusive of playing pitches - and public transport provision such as Bus Rapid Transit services, pending a decision from the National Roads Authority / Central Government in relation to the future

status of the Bypass. Any potential additional future short-term uses of the reservation corridor will be subject to a joint feasibility study to be undertaken by the NRA and NTA.”

Section 4 of the corridor protection study sets out suggested development control measures for developments adjacent to the route corridor. Item 4 of the pre-planning Opinion issued by ABP included further consideration of the motorway reservation and the applicant’s response to the Opinion addresses each of the issues raised in section 4. The points made may be summarised as follows:

- *(A) Possible noise vibration and air impacts to be mitigated during construction and operational phases. This will take account of exceptional activities that will arise on the Eastern Bypass Project such as rock breaking in granite.*

Block F elevations are 12m from the bypass reservation. The facades will be constructed with appropriate sound mitigation measures. Noise mitigation screening as part of landscaping works will be considered if appropriate. It is anticipated that the road design will have inherent acoustic screening. The structures of new buildings close to the bypass will be designed with relevant vibration tolerance.

- *(B) Appropriate access provision to the Eastern Bypass construction site for haulage vehicles, especially in the context of large volumes of excavated material to be removed. Provision to minimise segregation by the route in the future.*

The development is located to the north of the bypass and will not impinge on access to it. Alternative access to the development can be provided from UCD campus.

- *(C) Proximity to mainline alignment, allowing some flexibility for future optimisation to the mainline design.*

Block F, the closest building, is 12m from the route corridor. It is likely that the closest feature of the new bypass at this juncture will be remote due to the site topography. Flexibility for the mainline design would not be significantly inhibited.

- *(D) Specific considerations where retaining walls are proposed along the Eastern Bypass.*

Block F would be a standalone structure with foundations outside the zone of influence of the roadway excavation. Construction would not involve retaining walls.

- *(E) Service diversion to be included in the development proposals to remove future obstacles to construction of the Eastern Bypass.*

The enabling works for Phase 1 of the development include the relocation of internal site services such as gas, water and IT infrastructure internally within UCD. It is not intended to re-route existing services on Fosters Avenue.

Alternative service provisions are available from the main Belfield Campus if required during the Eastern Bypass works.

- *(F) Open Space provision*

The development includes campus amenity spaces, student amenity spaces, courtyard areas, external play areas, external seating and study spaces.

Extensive tree planting and additions to the UCD woodland walks and pedestrian amenity tracks are included in the landscape masterplan.

- *(G) Visual Impact*

Block F is considered to be an appropriate scale at this location. It will be screened from the bypass by landscaping.

- *(H) Soil Disturbance*

Anticipated soil disturbance associated with the bypass is remote from Block F.

Excavation and soil disposal will be carried out in accordance with European and Irish regulations.

- *(I) Groundwater Considerations*

Development foundations will be above groundwater level based on site investigation works.

- *(J) Public Awareness*

UCD is the site owner and developer and is committed to a positive working relationship on sustainable travel with TII.

The comment by DLRCC Transportation Section notes that the relevant section of the Eastern Bypass is south of where the bypass tunnel ends and will probably be in-

cut. Adjacent amenity spaces are therefore unlikely to be at a lower level than the road. The onus is on the developer to include noise amelioration into its design. I consider that the submission generally addresses the issues set out in the corridor protection study and that the development will not significantly impinge on the road reservation route.

The proposed construction entrance and haul road from Fosters Avenue are located in the corridor. However, they are temporary and would not significantly increase the scope of demolition works required to clear the site in the event that it was required to vacate the land to allow for construction of the bypass. The applicant submits that SLO6 includes promotion of potential short term uses of the reservation corridor and this point is accepted.

10.9.5. Construction Access and Traffic Impacts

The development is to be constructed in 3 phases over a 10 year period. It includes a temporary signalised construction access from Fosters Avenue, connecting to an existing internal haul road within the campus. This access is provided for in the current campus travel plan. The Fosters Avenue junction includes a temporary right turning lane from Fosters Avenue into UCD and associated alterations to the traffic signals on Fosters Avenue. These measures are intended to reduce construction traffic using the N11 access. Projected construction traffic volumes are estimated based on recent works carried out at the Ashfield student residence within the campus. A peak of 32 no. 2-way HGV movements to and from the campus is anticipated during the most intensive period of development works. Construction traffic is to be managed such that the peak HGV movements are expected to occur outside of peak commuting hours (construction traffic management plan). Trip generation and junction analysis indicates that additional construction traffic movements at the proposed new access from Fosters Avenue will have negligible impact due to relatively low traffic volumes.

A temporary access road to Merville student residence is to be provided during phase 1 works, details are provided in the outline CEMP. This is acceptable.

No impacts on existing car parking provisions within the campus are anticipated during construction as the existing quantum of parking provision is to be maintained and managed, as per phasing discussed above. A temporary car park with c. 200 no.

spaces is to be provided next to the new Fosters Avenue access, to cater for construction traffic and prevent overspill of construction parking outside the campus. Construction staff will not be permitted to use existing staff and student permit parking.

The proposed construction traffic and parking arrangements are considered satisfactory and unlikely to have any significant adverse impacts.

10.9.6. Transportation Conclusion

To conclude, I am satisfied with the proposed parking, roads and junction layouts with regard to safety requirements and relevant policy provisions. It is also considered that the development will not have significant adverse impacts on traffic or parking in the area.

10.10. **Site Services**

10.10.1. Drainage

There is an existing surface water attenuation lake at the UCD Belfield campus, adjacent to the Sutherland School of Law building. This was designed to cater for the School of Law development and to allow for further development at the campus including the development site. The lake was designed to provide attenuation storage for a 1 in 100 year storm event, with a 10% allowance for climate change. Outflow from the lake is restricted by hydrobrake to 8.45 l/sec = QBar. There is an overflow weir to prevent overtopping with the weir level set at the 100 year flood level, also an emergency 300mm diameter outfall pipe with a sluice valve that can drain the lake if levels rise too high. The restricted flow from the attenuation lake discharges to the existing surface water drainage system on the campus, which outfalls to the Elm Park stream, which is partially culverted as it flows through the centre of the campus. Run off from the existing Roebuck Hall student residences is to a separate 'Stormtech' attenuation tank system, which discharges to an existing 600mm diameter DL RCC storm sewer that runs through this part of the campus, exiting to the Roebuck Castle estate.

The development is to connect to the existing DL RCC 600mm diameter storm sewer, which is to be diverted to the west of the Roebuck Castle building. The existing 'Stormtech' system serving the Roebuck Hall student residences lies within the footprint of the proposed basement car park. It will be decommissioned and the run-

off from the student residences will be diverted to new surface water network. The attenuation volume from the residences is to be consolidated in the existing attenuation lake at the School of Law, which will provide treatment storage for all flow from the development. The attenuation lake will also cater for other new developments at the campus, i.e. the new Confucius Institute and the permitted Quinn School of Business extension. The run off from these developments has been taken into consideration in the drainage calculations for the lake. Drainage calculations (including phasing) are provided in the Civil Engineering Infrastructure Report submitted, which states that the development will result in a reduction in surface water flow to the Roebuck Castle estate. The development includes SUDS measures such as green roofs with rainwater harvesting, permeable paving and swales, which provide interception storage and initial filtration prior to discharging to the attenuation lake, which also acts as a settlement pond. A new lake outfall, and a new section of outfall pipe network will be constructed and the old outfall and hydro-brake manhole decommissioned. The existing overflow weir structure will remain at an increased level to provide attenuation storage for the 1 in 100 year storm event. Predicted discharge will be limited to QBAR or the predicted greenfield runoff for the mean annual flood.

The Civil Engineering Infrastructure Report includes a flood risk assessment, which notes that the most recent flood event in the vicinity, according to OPW Flood Hazard mapping, was at the junction of Roebuck Road and Goatstown Road in 1963. The Belfield area is not considered to be at significant risk of fluvial or coastal flooding with regard to the National Preliminary Flood Risk Assessment carried out in 2011 and the site is in Flood Zone C as per the Eastern CFRAMS. It is therefore appropriate for residential development as per the guidance provided in the section 28 guidelines '*The Planning System and Flood Risk Assessment Guidelines for Planning Authorities*'.

There is an existing foul sewer network on the campus, which discharges to the DLRCC public sewer located close to the N11 entrance to the campus. There is also an existing public foul sewer which enters and exists the campus from the Roebuck Castle estate and serves the buildings in this part of the campus. The Roebuck student residences, however, discharge to the campus system and ultimately the N11 outfall. It is proposed to connect all of the foul drainage generated from the

development to the existing campus system. This will result in a reduction of foul flow to the Roebuck Castle system. Irish Water confirmed that they have receiving capacity to accommodate the development without upgrade in March 2017, correspondence in relation to same is submitted. The basement car park also drains to the foul system via a petrol interceptor and a sump below the basement slab.

I note that the Surface Water Drainage Report submitted by DLRCC states no objection subject to conditions. The proposed drainage arrangements are considered acceptable given that the existing campus system has been designed to cater for the development.

10.10.2. Water Supply

The UCD campus is primarily served by an existing ring watermain system, which is supplied by the UCD water tower. There is also a 100mm diameter feed off the watermain on the N11, which supplies the existing student accommodation. It is proposed to take a new 225 mm diameter feed off an existing 200 mm diameter watermain on Fosters Avenue to serve the development. Irish Water have confirmed capacity and a copy of the pre-connection enquiry is submitted. As discussed above, harvested rainwater will be used within the development to reduce demand for potable water from the public system. The application includes a water conservation plan to minimise water consumption within the development by measures such as low water use and leak detection. These proposals are satisfactory.

10.11. **Biodiversity**

10.11.1. Bat Impacts

All species of bat found in Ireland are protected by Annex IV of the Habitats Directive and the Wildlife (Amendment) Act, 2000. The development was referred to the Development Applications Units (DAU) at the Dept. of Arts, Heritage and the Gaeltacht for comment prior to lodgement of this application. The response, dated 14th April 2016, states that bats are frequently observed in the area and recommends comprehensive bat surveys. The EIAR includes a report on bat activity at the site, dated September 2017. This was prepared by a zoologist and considers bat roost potential at the wider UCD campus and at the development site. It is based on use of bat detectors at the site on May 22nd / 23rd and July 22nd / 23rd 2016. Buildings proposed for removal were also examined for signs of bat activity on 30th May and

7th September 2016. The surveys found 3 no. bat species at Roebuck Castle, i.e. common pipistrelle, soprano pipistrelle and Leisler's bat, also Leisler bat activity adjacent to the NOVA building, outside the development site. The pipistrelle species did not indicate any evidence of roosting activity. However, a Leisler's bat maternity roost was found at the Roebuck Chapel and a mating roost / perch was found within trees near the NOVA building, outside the development site. Bat activity levels at UCD are assessed as low overall, this is attributed to the presence of high levels of artificial light.

Potential bat impacts associated with the development relate to noise and vibration impacts during construction; the loss of the Leisler's Bat maternity roost at Roebuck Chapel; impacts on foraging and commuter activity as a result of the loss of mature vegetation and an increased level of artificial lighting at the development site. It is proposed to replace the Roebuck Chapel roost with a heated bat roost box within Roebuck Castle. A heated bat roost box is also to be installed at the existing gate lodge. In addition, 3 no. bat boxes are to be installed on an interim basis prior to the completion of these works. The works are to be supervised by a bat ecologist. A derogation licence from the NPWS has been submitted with the application, this authorises roost disturbance and the damage or destruction of breeding sites or resting places. In addition, demolition and tree felling are to be supervised by a bat ecologist and artificial light overspill is to be controlled. The bat report also recommends that a hedge be planted to the west of the sports / outdoor activity area to reduce the effects of flood lighting, this could be a condition of permission. Predicted residual impacts are moderate negative in the short term but low in the long term as bats adopt new roost sites and new planting develops.

These proposals are reasonable and on this basis it is considered that the development would not result in any significant adverse impacts on bat species subject to the proposed mitigation measures. The proposed new bat boxes would not be a requirement of permission if Phase 3 is not granted.

10.11.2. Trees and Woodlands

Development plan section 8.2.8.6 states:

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

regard to objectives to protect and preserve trees and woodlands as identified in County Development Plan Maps.”

There are development plan objectives to protect trees and woodlands throughout the UCD campus.

A tree assessment report by an arboriculturalist is submitted with the EIAR. This includes a tree survey of the development site. The survey tagged a total of 627 no. trees within the site, c. 65% of which are in the young / semi-mature category and c. 66% category C (low quality/value). The development involves the removal of 317 trees and the loss of the hedgerow bisecting the playing fields. The majority of the trees to be removed are identified in the tree report as ‘young’ or ‘early mature’ (category B, C or U). No category A trees (trees of high quality / value with a minimum 40 years life expectancy) are to be removed. The drawings submitted do not indicate the exact tree specimens to be removed, however the site plan indicating areas to be demolished includes existing trees and it is evident where areas of trees are to be removed. The landscaping scheme includes c. 670 trees to be planted. Other mitigation measures include tree protection during construction. A detailed ‘tree constraints plan’, which plots the crown spreads of trees at the site, has been prepared to inform tree protection. The application provides limited details of the proposed tree planting, however it is clear that the landscaping would result in a substantial net increase in the total number of trees at the site and would supplement existing wooded areas at the development, particularly at the Roebuck Castle / Phase 3 area and along the western site boundary shared with Roebuck Castle estate.

It is considered that the impacts on existing trees and woodlands are acceptable and that the development would not contravene development plan tree and woodland protection objectives that apply to the UCD campus. In addition, having inspected the site, I do not consider that there are any substantial remains of any historic garden or planting in the Roebuck Castle / Phase 3 part of the development. The proposed limited tree removal in this area is therefore acceptable.

10.11.3. Other Biodiversity Impacts

EIAR chapter 10 comprises a biodiversity impact assessment and includes assessment of impacts on bats and trees as well as habitats, flora and fauna present

at the development site. Aside from the above impacts on bats and trees, the development will result in a loss of nesting habitat for birds and invertebrates. Bird surveys carried out at the site found that all species present are common and loss of habitat will not affect their overall population. New landscaping is likely to provide additional habitat for bird species. Proposed mitigation measures include tree felling outside the nesting season and the installation of 9 nesting boxes for Swifts, a threatened bird, throughout the scheme, also the removal of trees outside the summer nesting period. There is a stand of Japanese knotweed within a storage yard at the development site. There is an existing management plan in place for its eradication. There is a drainage ditch at the site, which is culverted and of minimal value for fisheries or other aquatic species. It is not connected to any larger river considered to be of salmonid value. Overall, minor to moderate negative residual impacts are identified in the EIAR.

The DAU comment notes that badgers are known to be present in the area. Site surveys did not find any evidence of badger activity. A badger was observed during the bat survey at a location north of Roebuck Road within the UCD campus but well outside the development site. While badgers may forage in the development site area occasionally, such activity would be confined to woodland areas. There will be no loss of foraging areas which could be considered likely to result in long term effects on the local badger population.

10.11.4. Biodiversity Conclusion

The Biodiversity Officer of DLRCC does not state any objection subject to conditions. I note that the EIAR does not identify any significant residual biodiversity impacts. This conclusion is accepted subject to the implementation of the proposed mitigation measures.

10.12. **Appropriate Assessment Screening**

- 10.12.1. All designated sites within 15km of the development are listed in above section 6.4.1. The site is not located within any European site. It does not contain any habitats listed under Annex I of the Habitats Directive. The site is not immediately connected to any habitats within European sites and there are no known indirect connections to European Sites. Potential impacts on Natura 2000 sites from the development are restricted to the discharge of surface and foul water from the

site. I note the AA screening report submitted by the applicant, dated September 2017, which concludes that significant impacts can be ruled out and / or AA is not required. I note the urban location of the site, the lack of direct connections with regard to the source-pathway-receptor model and the nature of the development. It is reasonable to conclude on the basis of the information available on the file, which I consider adequate in order to issue a screening determination, that the development, individually or in combination with other plans or projects would not be likely to have a significant effect on the above listed European sites, or any other European site, in view of the sites' Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

10.13. Part V

10.13.1. Development plan section 2.1.3.12 states:

“No social / affordable housing will be required in instances where it is proposed that bona fide / purpose built student accommodation is to be provided on the campus of a recognised Third Level institution.”

The development does not include any Part V provision in accordance with this policy. This is satisfactory pending further guidance to be issued by the Dept. of Housing, Planning and Local Government on the application of Part V to student accommodation.

10.14. Planning Conclusion

10.14.1. Having regard to the above assessment, I conclude that permission should be granted for Phases 1 and 2 of the development and refused for phase 3 of the development.

11.0 Environmental Impact Assessment

11.1. Statutory Provisions

11.1.1. This application was submitted to the Board after 16th May 2017, the date for transposition of Directive 2014/52/EU amending the 2011 EIA Directive. The Directive has not, however, been transposed into Irish legislation to date. In accordance with the advice on administrative provisions in advance of transposition

contained in Circular Letter PL1/2017, it is proposed to apply the requirements of Directive 2014/52/EU.

11.1.2. The application was accompanied by an Environmental Impact Assessment Report (EIAR), which is mandatory for the development in accordance with the provisions of Part X of the Planning and Development Act 2000 (as amended) and Schedule 5 of the Planning and Development Regulations 2001-2015. Item 10 of Part 2 of Schedule 5 provides that an EIA is required for infrastructure projects comprising of:

(b) (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.

(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)

The development site has a stated area of 12.95 ha and therefore exceeds the above threshold and EIA is thus mandatory in this case.

11.1.3. The EIAR is laid out in one volume and includes a Non-Technical Summary. Chapters 1-3 establish the context of the development and outline the stated strategic need for it with regard to the existing provision of student accommodation on the UCD Belfield campus and the current student population of over 26,600. Chapters 2 and 3 detail the site and the proposed development and section 2.3 details relevant planning history at the Belfield campus.

11.1.4. I am satisfied that the information contained in the EIAR has been prepared by competent experts and complies with article 94 of the Planning and Development Regulations 2000, as amended, and the provisions of Article 5 of the EIA Directive 2014.

11.1.5. I have carried out an examination of the information presented by the applicant, including the EIAR, and the submissions made during the course of the application. A summary of the results of the submissions made by the planning authority, prescribed bodies and observers has been set out at Section 7.0 and 8.0 of this report.

11.1.6. This EIA has had regard to the application documentation, including the EIS, the observations received and the planning assessment completed in Section 10 above.

11.2. Alternatives

11.2.1. Article 5(1)(d) of the 2014 EIA Directive requires:

(d) a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;

Annex (IV) (Information for the EIAR) provides more detail on ‘reasonable alternatives’:

2. A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

11.2.2. The matter of alternatives is addressed in Chapter 4 of the EIAR. Section 4.1 outlines a rationale for the development in the context of a report prepared by the Higher Education Authority (HEA) in 2015 entitled the ‘Report on Student Accommodation: Demand & Supply’. This notes that there has been an unprecedented growth in participation in recent years. Based on current and projected student accommodation up to 2024, it is estimated that there is an unmet demand of c. 25,000 student bedspaces which has a significant impact on the private rental sector. The strategic need for the development is also considered with regard to the provisions of the ‘Rebuilding Ireland Action Plan for Housing and Homelessness’ (2016), the Dept. of Education and Skills ‘National Student Accommodation Strategy’ (July 2017) and the UCD Strategic Campus Development Plan 2016-2021-2026. Section 4.2 notes that the county development plan prioritises the provision of on-campus student accommodation ahead of locations off campus. The development site is considered the most suitable location within the campus due to the scale of development it allows and to the designation of this part of the campus as a ‘Residential’ character area in the campus development plan. Section 4.2 also examines several alternative layouts that were proposed during the design process and considers alternative mitigation measures and the ‘do nothing’ option. The evolution of the current proposal was informed by consideration of several

environmental aspects; vehicular and pedestrian movements; maximisation of pedestrian connectivity through the site; linkages with adjoining Student Accommodation, protection of architectural heritage, protection of adjoining residential amenities and retention of existing mature trees.

11.2.3. In this regard I consider that the matter of the examination of alternatives has been satisfactorily addressed.

11.3. Likely Significant Direct and Indirect Effects

11.3.1. The likely significant indirect effects of the development are considered under the following headings, after those set out in Article 3 of the EIA Directive 2014/52/EU:

- population and human health;
- biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
- land, soil, water, air and climate;
- material assets, cultural heritage and the landscape;
- the interaction between the factors referred to in points (a) to (d).

11.3.2. Population & Human Health

The assessment examines the socio-economic impacts relating to the proposal, including impacts due to demographic change, impacts on the community and on community facilities and on the economy. Predicted impacts primarily relate to an increased student population and additional facilities on campus, which is identified as a long term moderate positive impact. Potential unplanned events relate to spillages of hydrocarbons and cementitious materials. Mitigation measures comprise construction management, including construction traffic, and consultation with local residents. The student accommodation is to be managed on an ongoing basis to reduce incidences of anti-social behaviour or other impacts on local residents. No significant residual or cumulative impacts or interactions are identified. I have considered all of the written submissions made in relation to population and human health. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant

adverse direct, indirect or cumulative effects on population and human health are likely to arise.

11.3.3. Soil and Geology

The development site currently consists of greenfield playing pitches, gravel areas used as temporary car parking and existing buildings. Site investigations carried out in January 2016 indicate made ground / boulder clay over Calp limestone with no bedrock exposures. These soils are considered to be 'Low-Medium' importance as a function of poor to medium quality soils, of local importance only. The site does not lie within a geological heritage area. Historical contamination is not expected. This chapter includes consideration of the topic 'land', as specified in the 2014 EIA Directive. Advice on the interpretation of 'land' will be provided in the forthcoming guidance from the Dept. of Housing, Planning and Local Government. In the absence of same, I note relevant guidance provided in the EPA 'Draft guidelines on Environment Impact Assessment Reports' (2017) and in Recital 9 of the 2014 Directive, which indicate that the topic 'land' relates to the issue of 'land take'.

Potential impacts relate to proposed significant excavations of soils and subsoils, extending into the Dublin boulder clay. The soils are of importance at a local scale only. Contribution to cumulative impacts to the local soil and geological environment is deemed to be negligible. Potential unplanned events are related to the risk of flooding at the site, however this is identified elsewhere in the EIAR as negligible. Section 6.4 outlines proposed mitigation measures, including those to prevent dust generation and to avoid contamination by concrete and fuels/ hydrocarbons. Residual impacts are assessed to be long term and negligible.

I have considered all the written submissions made in relation to land, soil and geology. I am satisfied that potential adverse direct, indirect or cumulative effects on land, soil and geology have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects are likely to arise.

11.3.4. Water: Hydrology and Hydrogeology

The thick layer of Dublin boulder clay at the site exhibits generally moderate drainage characteristics. The underlying Calp limestone is classified by the GSI as a locally important aquifer, which is moderately productive only in local zones (LI). Due

to low permeability and poor storage capacity, the aquifer has a low recharge acceptance. Groundwater vulnerability across the Belfield campus is classified by the GSI as 'low', due to the depth of low permeability overburden. The site does not lie within a groundwater source protection area as mapped by either the GSI or EPA. The majority of Belfield campus, including the development site, is within the catchment of the Elm Park Stream, which is culverted through the centre of campus. It continues under the N11 and outfalls to the sea at Merrion, flowing into South Dublin Bay SAC and Rockabill to Dalkey Island SAC. These are considered to be the primary designated areas at risk from site activities. Its natural catchment areas are heavily urbanised and may have been altered by stormwater drainage networks. OPW data does not indicate any recent flood events in the vicinity.

Potential stormwater impacts primarily arise from runoff during the construction stage, proposed mitigation measures are outlined. Operational stormwater impacts are considered with regard to the proposed drainage measures, including SUDS. Other mitigation measures include hydrocarbon and silt interceptors. The development will result in a cumulative increase in potable water and foul water discharge, subject to agreement with Irish Water and DLRCC. When considered in tandem with other existing developments in the area, the development will result in cumulative impacts associated with the further removal of greenfield areas and replacement with hardstanding. Potential unplanned events are related to the risk of flooding at the site, however this is identified as negligible. Proposed mitigation measures relate to the prevention of water pollution and the control of run-off. Predicted residual impacts are short term and imperceptible.

I have considered all the written submissions made in relation to water, hydrology and hydrogeology. I am satisfied that potential adverse direct, indirect or cumulative effects on water, hydrology and hydrogeology have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects are likely to arise.

11.3.5. Noise and Vibration

Detailed baseline noise monitoring was carried out at the UCD campus at 4 no. locations close to noise sensitive receptors (NSRs) in the vicinity of the development

site, i.e. residential properties at Roebuck Castle estate, Roebuck Hall residence and Merville residence. There are no significant sources of vibration in the vicinity.

Predicted construction noise impacts are associated with construction works and associated traffic are modelled for each of the 4 NSRs based on a worst case scenario. The results presented are well within acceptable limits set out in the NRA document '*Guidelines for the Treatment of Noise and Vibration in National Road Schemes*', which presents indicative noise levels that are typically deemed acceptable during construction phase of road developments. Predicted vibration impacts during construction primarily relate to HGV movements and other construction traffic. These are to be within the acceptable standards set out in British Standard BS 5228-2:2009+A2:2014 *Code of Practice for Noise and Vibration Control on Construction and Open Sites* and the NRA guidance document. There are no predicted operational vibration impacts. The predicted increase in noise levels associated with additional vehicular traffic as a result of the development is barely perceptible with a negligible impact. There are no predicted cumulative impacts or impacts associated with unplanned events. EIAR section 8.5.1 sets out detailed mitigation measures to prevent noise and vibration impacts during construction, including a Noise and Vibration Management Plan and consultation with local residents. Predicted residual noise and vibration impacts during construction are identified as not significant and temporary. Operational noise impacts are within the criteria set out in British Standard 4142:2014 *Methods for Rating and Assessing Industrial and Commercial Sound*. Residual noise and vibration impacts for the operational stage are identified as imperceptible and long term.

I have considered all of the written submissions made in relation to noise and vibration. I am satisfied that the noise and vibration impacts identified for the construction stage would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of noise and vibration.

11.3.6. Air, Dust and Climatic Factors

EIAR section 9.1 describes existing meteorological conditions, influences on ambient air quality and existing ambient air quality based on available 2013-2015 data from EPA monitoring stations at suburban locations in Dublin. Existing ambient air quality is good for all health-related pollutants. Potential air quality impacts relate to dust emissions and transport vehicles during construction and emissions of particulate matter and combustion gases from heating and traffic during the operational stage. Mitigation comprises a Dust Minimisation Plan during construction. A temporary short term adverse residual impact is predicted during construction. No quantifiable impacts are predicted for the operational stage. Due to the size and nature of the development, greenhouse gas emissions will be imperceptible in the national context. Impacts on atmospheric conditions will also be imperceptible. There is no meaningful potential for unplanned events.

I have considered all of the written submissions made in relation to air, dust and climatic factors. I note that some of the written submissions refer to dust impacts during construction. I am satisfied that these concerns have been appropriately addressed in terms of the application the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects are likely to arise.

11.3.7. Biodiversity: Flora and Fauna

The EIAR describes the habitats and species present at the site. The site was found to contain no records, or suitable habitat for rare or protected plant species as listed in the Flora Protection Order 2015 or Red Data Lists. A bat survey was carried out in May and July 2015. A total of 3 no. bat species were active from the site and a significant maternity roost of Leisler's Bat is located in Roebuck Chapel. Site visits were carried out on February 5th 2016 and August 8th 2017. These found no badger setts or indications of badger activity although they are present in the vicinity.

Woodland areas are likely to be home to some of the smaller protected mammals including Irish stoat, pygmy shrew and hedgehog, however no direct evidence of any mammal was recorded. These areas also provide nesting habitat for a range of common garden or countryside birds. A dedicated bird survey was carried out on August 8th 2017, within the breeding season, however no evidence of breeding from

buildings within the site was noted. There are no habitats for breeding amphibians while the watercourse is of minimal fisheries value.

Potential biodiversity impacts relate to habitat loss, habitat / species disturbance, impacts on water quality and landscaping. No significant cumulative impacts are identified. Proposed mitigation measures comprise carrying out construction works outside the nesting season; additional landscaping to replace lost trees; installation of new bat boxes at Roebuck Castle; installation of nesting boxes for swifts; management of overspill from artificial light to reduce bat impacts; surface water drainage, SUDS and attenuation measures and foul effluent disposal to the wastewater treatment network; construction management measures including tree protection, measures to prevent water pollution and invasive species management. Residual impacts are identified as minor negative impacts on bats. No other significant residual impacts to biodiversity are expected to arise.

I have considered all of the written submissions made in relation to biodiversity. I am satisfied that the identified impacts on bats and trees would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of biodiversity.

11.3.8. Landscape & Visual Impact Assessment

The LVIA considers views of the development from 12 no. vantage points at locations within the UCD campus, at the Owenstown entrance, at Roebuck Road, within Roebuck Castle estate and wider views of the scheme from Deerpark in Mount Merrion. I am satisfied that the viewpoints selected allow for an adequate assessment of overall visual impacts, particularly from sensitive locations such as residential areas and designated views.

Potential visual impacts during construction are related to temporary works, site activity and vehicular movement within and around the development site.

Construction impacts are assessed as short term. Proposed mitigation is phasing and appropriate site management measures.

Potential operational visual impacts are divided between those within and outside the campus. With regard to cumulative impacts, the visual impacts are considered in the

context of the new Confucius Institute and a possible extension to the Quinn School of Law. Proposed mitigation measures primarily comprise landscaping. Residual impacts are assessed as follows:

- The overall impact on landscape character will be significant and neutral.
- The overall impact on landscape amenity value is moderate and positive.
- Impacts on views nos. 1-12. Moderate and neutral at views nos. 1, 4, 12. Significant and neutral at views nos. 2, 3, 5, 7. Significant and negative at views nos. 6, 9. Significant and neutral at view no. 7. Slight and neutral at views nos. 10 and 11.
- There will be a cumulative impact of further built development in the area.

The impacts are assessed overall as moderate / significant and neutral within the UCD campus, at the Owenstown Park entrance. There are significant impacts at Roebuck Road, including view no. 6 at Roebuck Castle, which is assessed as significant and negative. Views from within Roebuck Castle estate are assessed as slight and neutral except for view no. 9, which is assessed as significant and negative. The longer views nos. 11 and 12 are assessed as slight / moderate and neutral.

I have considered all of the written submissions made in relation to landscape and visual impacts, in addition to those specifically identified in this above planning assessment. With regard to Phases 1 and 2 of the development, I am satisfied that potential adverse direct, indirect or cumulative visual impacts on the surrounding area have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse effect is likely to arise. However, I consider that the EIAR underestimates visual impacts associated with Phase 3 of the development. This matter is discussed in detail in the planning assessment in above section 10.5.

11.3.9. Material Assets: Traffic & Transport

The traffic and transport section of the EIAR reviews the existing transport policy context and existing road, traffic, pedestrian, cyclist and public transport conditions and existing travel patterns at the UCD campus. The proposed parking and vehicular

access / traffic management strategies are outlined, also road works and temporary construction works to Fosters Avenue.

Potential construction traffic impacts relate to the provision of a new temporary vehicular access from Fosters Avenue to the campus, with an associated haul road and temporary parking area. Existing traffic signals on Fosters Avenue are to be altered to permit right turning movements. The quantum of construction traffic is predicted based on a profile of HGV movements at the campus during the recent, overlapping, construction of the Ashfield residences and the Confucius institute. The forecast predicts a 1% increase in traffic volumes along Fosters Avenue (16 trips) and a 2% increase in traffic volumes at the junction of Fosters Avenue and North Avenue (33 trips). Junction analysis indicates that these additional movements will have negligible impact due to the relatively low traffic volumes. The provision of 200 construction staff car park spaces will mitigate the potential for car parking overspill into residential areas or the UCD campus. Traffic and parking will be managed as part of the CEMP. Construction traffic impacts are assessed as negligible.

The development will not result in any material increase in traffic volumes at operational stage as it will reduce commuter movements to and from the campus by increasing the proportion of the student population living on site. The proposed new basement and surface car parking provision will be balanced by closure of existing surface car parking at various locations within the campus, resulting in a consolidation and rationalisation of car parking provision and an additional 10 no. car parking spaces in total. Ongoing traffic and transport monitoring is to be carried out by UCD, including annual travel surveys. Travel demand at UCD will continue to be managed at a campus wide level in accordance with the UCD travel plan. Residual impacts are identified as positive.

I have considered all of the written submissions made in relation to traffic and parking impacts. I am satisfied that they have been appropriately addressed in terms of the application, the information submitted by the applicant and the impacts identified would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions.

11.3.10. Material Asset: Water Supply & Drainage

EIAR section 13 describes the existing surface water, foul sewer and water supply infrastructure serving the campus and sets out the proposed surface water drainage system and connection to the public foul sewer and water supply. There are potential impacts on the groundwater regime, on local watercourses and on water quality. Proposed mitigation measures include SUDS interception storage and the provision of treatment storage in the attenuation lake on campus, which acts as a settlement pond. Outfall is attenuated and the pipe network and attenuation storage volumes will prevent flooding. All drainage calculations include a 10% climate change allowance. The CEMP includes measures to prevent adverse impacts on water quality during construction. No significant cumulative or residual impacts are predicted.

I have considered all of the written submissions made in relation to water supply and drainage. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of water supply and drainage.

11.3.11. Material Asset: Utilities

EIAR section 14 sets out existing and proposed utilities serving the site, i.e. electricity, natural gas and telecommunications. Potential impacts primarily relate to the provision of 3 new double substations each with up to 1.1MW capacity, to serve the 3 phases of the development. The ESB network at UCD is being developed to ensure an additional capacity of 10MW for future campus development, which includes these loads. No other significant impacts are predicted.

I have considered all of the written submissions made in relation to utilities. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects on utilities are likely to arise.

11.3.12. Architecture & Cultural Heritage

This section of the EIAR considers impacts on the protected structures Roebuck Castle and Roebuck Glebe, on Crannog Lodge and on the overall setting of UCD

Belfield campus. it describes the existing structures and details their history.

Potential impacts may be summarised as follows:

- Roebuck Castle. Positive impact of removal of later additions. Moderate visual impact of new buildings. Neutral, moderate and permanent residual impact.
- Glebe Lodge. Residual neutral / negative, significant / moderate impact of new buildings on the setting of this protected structure.
- Crannog Lodge. Residual neutral / negative, significant / moderate impact of development on the setting of this building.

Overall impacts are assessed as neutral, significant and long term. Proposed mitigation measures are retention of existing trees, landscaping, boundaries and screening, as well as the recording of structures to be demolished.

Residual impacts are identified as follows:

- Roebuck Castle. Neutral, moderate and permanent.
- Stone wall. Neutral, slight and long term.
- Roebuck Glebe. Neutral / negative, significant / moderate and permanent.
- Crannog Lodge. Neutral / negative, significant / moderate and permanent.
- Overall setting. Neutral, moderate and permanent.
- Belfield campus. Neutral / positive, significant / moderate and permanent.

Significant cumulative impacts are not identified.

I have considered all of the written submissions made in relation to architectural and cultural heritage impacts, in addition to those specifically identified in this above planning assessment. With regard to Phases 1 and 2 of the development, I am satisfied that potential adverse direct, indirect or cumulative impacts on architectural and cultural heritage have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse effect is likely to arise. However, I consider that the EIAR underestimates impacts of Phase 3 on the protected structures Roebuck Castle and Roebuck Glebe and the historic building Crannog Lodge. This matter is discussed in detail in the planning assessment in above section 10.4.

11.3.13. Archaeology & Cultural Heritage

EIAR chapter 16 describes the archaeological background of the site, including cartographic sources, aerial photographs and toponyms. There is one Recorded Monument within the development site, Roebuck Castle, ref. DU022-017.

Archaeological monitoring was carried out to the immediate east of the site at the location of the National Institute for Bioprocess Research and Training Facility (NIBRT) November 2009 – January 2010. No finds or features of archaeological significance were exposed. A site visit was carried out on 11th August 2017. No potential archaeological features were noted and there are no areas of obvious archaeological potential.

With regard to potential impacts, the area of the training pitches within the site has shown little development since the 18th century, however development of this area may impact archaeological finds or features which might exist below ground.

Development in the area adjacent to Roebuck Castle may also impact archaeological finds or features which might exist below ground. Test excavations prior to construction are recommended as a mitigation measure. No residual impacts are anticipated. There is potential for interactions with surface water drainage, which may be addressed by appropriate monitoring during construction.

I have considered all of the written submissions made in relation to archaeology and cultural heritage. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of archaeology and cultural heritage.

11.3.14. Interactions of the Foregoing

I have also considered the interrelationships between factors and whether these might as a whole affect the environment, even though the effects may be acceptable when considered on an individual basis.

Table 17.1 provides a matrix of interactions. There are no potential significant negative interactions. There are potential moderate positive interactions between human beings and flora and fauna; human beings and material assets; water and flora and fauna; water and landscape and visual; flora and fauna and landscape and

visual; flora and fauna and material assets; human beings and landscape and visual; human beings and cultural heritage. It is submitted that all of the potential interactions are addressed in the relevant individual chapters of the EIAR, which presents an integrated report of findings from the impact assessment process rather than a collection of individual assessments. The development will not result in any significant cumulative or synergistic adverse impacts on the environment. This point is accepted.

In conclusion, I am satisfied that effects arising can be avoided, managed and mitigated by the measures which form part of the proposed development, mitigation measures, and suitable conditions. There is, therefore, nothing to prevent the granting of permission on the grounds of cumulative effects.

11.4. Reasoned Conclusion on the Significant Effects

11.4.1. Having regard to the examination of environmental information contained above, and in particular to the EIAR and supplementary information provided by the developer, and the submissions from the planning authority, prescribed bodies and observers in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:

- Noise impacts during construction which will be mitigated by environmental management measures including management of vehicles and plant; sound reduction measures; limited hours of construction; ongoing contact with local residents and monitoring of typical noise levels.
- Dust impacts during construction which will be mitigated by a dust management plan including a monitoring programme.
- Biodiversity impacts on bats which will be mitigated by the installation of new bat boxes at Roebuck Castle, or otherwise addressed by means of the omission of Phase 3 of the development.
- Biodiversity impacts on birds which will be mitigated by construction management measures and the installation of nesting boxes for swifts.
- Biodiversity impacts related to the loss of existing trees at the site which will be mitigated by the proposed landscaping scheme.

- Architectural and cultural impacts, which will be partially mitigated by the proposed landscaping scheme, or otherwise addressed by means of the omission of Phase 3 of the development.

11.4.2. Notwithstanding the conclusion reached in respect of the inability of the proposed measures to fully mitigate the landscape and visual impacts and the architectural and cultural impacts, it is considered that the environmental effects would not justify a refusal of planning permission for the scheme in its entirety having regard to overall benefits of the proposed development.

11.4.3. Having regard to the above, it is my view that the environmental effects arising as a consequence of the proposed development have been satisfactorily identified and assessed. I consider that the EIAR is compliant with Article 94 of the Planning and Development Regulations, 2001, as amended.

12.0 Conclusion

12.1. The proposed development is acceptable in principle with regard to national and local planning policy. The provision of c. 3,000 bedspaces at the UCD campus by 2024 is a key objective of the Dept. of Education and Skills 'National Student Accommodation Strategy' (2017) and of the 'UCD Strategic Campus Development Plan 2016-2012-2026'. It will also free up conventional accommodation in the area and thus contribute to the delivery of national housing targets set out in the 'Rebuilding Ireland Action Plan for Housing and Homelessness' (2016) and the core strategy and housing strategy of the Dun Laoghaire Rathdown County Development Plan 2016-2022. In addition, the use as visitor / tourist accommodation outside term time is in accordance with the definition of student accommodation provided under section 13(d) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

12.2. The design and layout of the scheme are generally satisfactory and in accordance with development plan policy and with the Dept. of Education guidance on student accommodation with certain specific exceptions, as discussed above. Having examined the design and the landscaping scheme, I am satisfied that the development will provide a high standard of student accommodation and ancillary facilities for future residents and will make a substantial contribution to the range of

amenities and services available at UCD and to the urban realm of the campus. It is also considered that the development would not have any significant adverse impact on the residential amenities of adjacent properties such as would entail a refusal of permission.

- 12.3. The proposed roads and parking arrangements are generally compliant with the standards of DMURS and the development plan. The provision of this quantum of additional student accommodation on campus is a central element of the UCD Campus Travel Plan 2016-2021-2026 as it will reduce the proportion of the student population commuting to and from the campus. It will therefore help to ameliorate the traffic impacts of a rising student population.
- 12.4. However, several issues arise regarding Phase 3 of the development at the existing Roebuck Castle complex at the southern end of the overall site, fronting onto Roebuck Road. This area is an enclave within the wider UCD campus, surrounded by trees and focused on the protected structures of Roebuck Castle and Roebuck Glebe and the historic Crannog Lodge. It is physically separate from the remainder of the campus and has a distinctive character that warrants a site specific treatment. In addition, the frontage to Roebuck Road presents an opportunity for the creation of a new 'gateway' to UCD with a high quality interaction between the university and the public realm at this location. While the demolition of later additions to the Roebuck Castle complex is acceptable in principle, it is considered that the proposed design, which is a continuation of the treatment of Phases 1 and 2, would have an adverse impact on the settings of the protected structures and does not present a satisfactory frontage to Roebuck Road. In addition, the abrupt transition in scale at this location relative to the adjacent suburban housing would contravene development plan policy on 'transitional zones', ref. section 8.3.2.
- 12.5. The EIAR is compliant with Article 94 of the Planning and Development Regulations, 2001, as amended. It is considered that the main significant direct and indirect effects of the proposed development on the environment will be mitigated by environmental management measures except for visual impacts and architectural and cultural impacts, which will be partially mitigated by the proposed landscaping scheme, or otherwise addressed by means of the omission of Phase 3 of the development.

12.6. I therefore recommend that the Board issue a split decision, permitting Phases 1 and 2 and refusing Phase 3 for the reasons and considerations set out below. As the quantum of development proposed for Phase 3 is 828 no. student bedspaces, this would result in a permission for 2,178 no. bedspaces in this instance. In addition, I recommend the omission of the 'Little Sisters' car park (225 no. spaces), in order to balance the total quantum of parking provision at the overall UCD campus, in accordance with the objectives of the campus travel plan. Given that a 10 year permission is sought, there is an opportunity for the applicant to apply for a revised Phase 3 proposal and associated car parking provision during the lifetime of this permission.

13.0 Recommendation

13.1. Section 9(4) of the Act provides that the Board may decide to:

- (a) grant permission for the proposed development.
 - (b) grant permission for the proposed development subject to such modifications to the proposed development as it specifies in its decision,
 - (c) grant permission, in part only, for the proposed development, with or without any other modifications as it may specify in its decision, or
 - (d) refuse to grant permission for the proposed development,
- and may attach to a permission under paragraph (a), (b) or (c) such conditions as it considers appropriate.

13.2. Having regard to the above assessment, I recommend that section 9(4)(c) of the Act of 2016 be applied and that permission is GRANTED for Phases 1 and 2 of the development, for the reasons and considerations and subject to the conditions set out below and REFUSED for phase 3 of the development, for the reasons and considerations set out below.

14.0 Reasons and Considerations (1)

Having regard to the site's location at the UCD Belfield campus on lands with a zoning objective TLI "To facilitate, support and enhance the development of third level education institutions" under the Dun Laoghaire Rathdown County Development Plan 2016-2022; to development plan Policy Res 12: Provision of Student Accommodation, which is to facilitate student accommodation on student campuses; to the provisions of the UCD Strategic Campus Development Plan 2016-2012-2026 and of the UCD Campus Travel Plan 2016-2021-2026, both of which identify the provision of the proposed quantum of student accommodation as a key objective; to the Rebuilding Ireland Action Plan for Housing and Homelessness; to the nature, scale and design of the proposed development and the availability in the area of a wide range of social and transport infrastructure; to the pattern of existing and permitted development in the area and to the submissions and observations received it is considered that, subject to compliance with the conditions set out below, Phases 1 and 2 of the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would respect the existing character of the area and would be acceptable in terms of traffic and pedestrian safety and convenience. Phases 1 and 2 of proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

15.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be 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. The period during which the development hereby permitted may be carried out shall be 10 years from the date of this order.

Reason: Having regard to the nature of the development, the Board considers it appropriate to specify a period of validity of this permission in excess of five years.

3. The development hereby permitted shall only be occupied as student accommodation, including use as visitor or tourist accommodation outside academic term times, and for no other purpose, without a prior grant of planning permission for change of use.

Reason: In the interest of residential amenity and to limit the scope of the proposed development to that for which the application was made.

4. The proposed development shall be amended as follows:

(a) The surface car parking proposed at the 'Little Sisters' site (225 no. spaces) is to be omitted in its entirety. Revised drawings and details showing same shall be submitted to the planning authority for written agreement.

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

Reason: To ensure that the development complies with the UCD Campus Travel Plan 2016-2021-2026 and in the interests of permitting an appropriate level of car parking to serve the development.

5. The site shall be landscaped in accordance with a comprehensive scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The developer shall retain the services of a suitably qualified Landscape Architect throughout the life of the site development works.

Reason: In the interest of residential and visual amenity.

6. All trees and hedgerows within and on the boundaries of the site shall be retained and maintained, with the exception of the following:

- (a) Specific trees, the removal of which is authorised in writing by the planning authority to facilitate the development.

- (b) Trees which are agreed in writing by the planning authority to be dead, dying or dangerous through disease or storm damage, following submission of a qualified tree surgeon's report, and which shall be replaced with agreed specimens.

Retained trees and hedgerows shall be protected from damage during construction works. Within a period of six months following the substantial completion of the proposed development, any planting which is damaged or dies shall be replaced with others of similar size and species, together with replacement planting required under paragraph (b) of this condition.

Reason: In the interest of visual amenity.

7. Details of the materials, colours and textures of all the external finishes to the proposed buildings shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of the visual amenities of the area.

8. No additional development shall take place above roof parapet level, including lift motor enclosures, air handling equipment, storage tanks, ducts or other external plant, telecommunication aerials, antennas or equipment, unless authorised by a further grant of planning permission.

Reason: To protect the residential amenities of property in the vicinity and the visual amenities of the area.

9. (a) During the operational phase of the proposed development, the noise level arising from the development, as measured at the nearest dwelling shall not exceed:-
 - (i) An Leq,1h value of 55 dB(A) during the period 0800 to 2200 hours from Monday to Saturday inclusive.
 - (ii) An Leq,15 min value of 45 dB(A) at any other time. The noise at such time shall not contain a tonal component.
- (b) All sound measurement shall be carried out in accordance with ISO Recommendation 1996:2007: Acoustics - Description and Measurement of Environmental Noise.

Reason: To protect the residential amenities of property in the vicinity of the site.

10. Water supply and 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.

11. (a) All foul sewage and soiled water shall be discharged to the public foul

sewer.

(b) Only clean, uncontaminated storm water shall be discharged to the surface water drainage system.

Reason: In the interest of public health.

12. (a) The roads and traffic arrangements serving the site (including signage) shall be in accordance with the detailed requirements of the planning authority for such works and shall be carried out at the developer's expense.

(b) The roads layout shall comply with the requirements of the Design Manual for Roads and Streets, in particular carriageway widths.

(c) Pedestrian crossing facilities shall be provided at all junctions.

(d) The roundabout at the junction between the realigned Owenstown Access Road and the campus ring road shall be omitted and replaced by a raised table junction.

(d) Footpaths shall be provided on both sides of the Owenstown access road.

(e) The materials used in any roads/footpaths provided by the developer shall comply with the detailed standards of the planning authority for such road works.

(f) The developer shall carry out a Stage 3 Road Safety Audit of the constructed development on completion of the works and submit to the planning authority for approval and shall carry out and cover all costs of all agreed recommendations contained in the audit.

Reason: In the interests of traffic, cyclist and pedestrian safety.

13. Mitigation and monitoring measures outlined in the Environmental Impact Assessment Report submitted with this application, shall be carried out in

full, except where otherwise required by conditions attached to this permission.

Reason: In the interest of protecting the environment and in the interest of public health.

14. The applicant shall carry out in full all mitigation measures as outlined in the submitted Bat Report to the written satisfaction of the planning authority.

Reason: To mitigate the potential impact of increased nocturnal illumination at the proposed development on bats, which are afforded a regime of special protection under the European Habitats Directive.

15. The applicant shall carry out in full all mitigation measures for the protection of birds as outlined in the submitted EIAR, to the written satisfaction of the planning authority.

Reason: In the interest of protecting the environment.

16. Construction and demolition waste shall be managed in accordance with a construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall be prepared in accordance with the “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.

Reason: In the interest of sustainable waste management.

17. A plan containing details for the management of waste within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, the waste shall be managed in accordance with the agreed plan.

Reason: To provide for the appropriate management of waste and, in particular recyclable materials, in the interest of protecting the environment.

18. Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays 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 residential amenities of property in the vicinity.

19. The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including hours of working, noise management measures and off-site disposal of construction/demolition waste.

Reason: In the interests of public safety and residential amenity.

20. A detailed construction traffic management plan shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The plan shall include details of arrangements for routes for construction traffic, parking during the construction phase, the location of the compound for storage of plant and machinery and the location for storage of deliveries to the site.

Reason: In the interests of public safety and residential amenity.

21. The developer shall pay to the planning authority a financial contribution 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. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

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.

16.0 Reasons and Considerations (2)

It is considered that, by reason of its design and scale adjacent to the protected structures Roebuck Castle and Roebuck Glebe and the design and scale of Block F2 in close proximity to the site boundary at Roebuck Road, Phase 3 of the proposed development would materially and adversely affect the character and setting of the protected structures and would therefore contravene policy AR1: Record of Protected Structures of the Dun Laoghaire Rathdown County Development Plan 2016-2022, i.e. the protection of structures included on the Record of Protected Structures from any works that would negatively impact their special character and appearance. In addition, Block F2, located in close proximity to residential areas, would not be in accordance with the guidance on 'transitional zones' provided in section 8.3.2 of the development plan as it would present an unsatisfactory frontage to Roebuck Road and would have a significant adverse impact on the visual and residential amenities of property in the vicinity. Phase 3 of the development would, therefore, seriously injure the visual amenities of the area and be contrary to the proper planning and sustainable development of the area.

Sarah Moran

Senior Planning Inspector

7th December 2017

17.0 APPENDIX I SUMMARY OF OBSERVER SUBMISSIONS

The main points made in each submission may be summarised as follows.

Mary O'Reilly

- The observer has an address at The Palms, Roebuck Road, Dublin 14.
- Adverse impact on property values.
- Development would generate too much traffic.
- Inadequate parking provision.
- Excessive density of development.
- Development is too close to the road.
- Requests an oral hearing.

Noel & Ann Carroll

- The observers have an address at The Palms, Roebuck Road, Dublin 14.
- Excessive density of development.
- Development would result in traffic congestion. Recent new housing at Knockrabo on Fosters Avenue, Our Ladies Grove School, Trimbleston on Clonskeagh Road and at Roebuck Road has added to heavy traffic in the area. There are other expanding educational institutions in the area that generate traffic on Roebuck Road, i.e. Our Ladies Grove N.S. and second level, St. Killian's German School, Mount Anville Junior and Secondary schools.
- Proposed apartment blocks near Roebuck Road have pedestrian access only but would generate additional parking demand nearby at The Palms and Ardilea, outside the campus, due to the pedestrian short cut.
- Excessive height of development. Blocks over 5 stories are unprecedented in the area. Existing educational institutions are low lying. Neighbouring houses are generally 2 storey. Development would set a precedent that is visually overpowering and would dominate the landscape, especially the protected structures of Roebuck Castle and Roebuck Glebe and Crannog.

David & Ann Hearn

- The observers have an address at Salzburg, Ardilea, Dublin 14.
- Observers generally support UCD provision of additional student accommodation.
- Extreme visual impact and inappropriate height. Development has an ‘office block’ appearance, out of character with this suburban area. No precedent on Roebuck Road. Development should have max. 3 stories and be more in keeping with the architecture of the area. UCD should have considered a ‘stepped back’ approach.
- Development does not present an active frontage to Roebuck Road. Proposed design creates a ‘UCD ghetto’, cutting the campus off from the surrounding area.
- Missed opportunity to develop improved cycling routes from the UCD campus, e.g. to the Dundrum Luas line.

Eva Dowling

- The observer has an address at Louvain, Ardilea, Dublin 14.
- The observer is the Green Party Local Area Representative for Stillorgan.
- Welcomes additional student accommodation in the area.
- Lack of public consultation.
- Excessive scale and height of development, out of keeping with the surrounding area.
- Application incorrectly states that apartments at the junction of Roebuck Road and Mount Anville Road are 5 storey, these are 3 storey / 3 storey over a commercial level.
- Proposed commercial development at Roebuck Road is out of keeping with this residential neighbourhood.
- Additional parking provision will result in traffic congestion.

Daniel Dowling

- The observer has an address at Louvain, Ardilea, Dublin 14.
- Development site is 20m from the observer’s home.

- Development would result in a high rise building directly overlooking the observer's home.

Elizabeth Moore Dowling

- The observer has an address at Louvain, Ardilea, Dublin 14.
- Proposed entrance to Roebuck Road is excessive in height and out of keeping with the area. Adverse impact on the setting of nearby residential properties at Louvain Ardilea and The Palms.
- Development would result in excessive scale, light and sound pollution in a quiet, residential neighbourhood.
- Adverse impacts on residential amenities due to overlooking and overshadowing.
- Proposed commercial development is out of keeping with Roebuck Road. It would generate movement and activity with significant impacts on the local area.
- Excessive density of development at the edge of the UCD campus.
- Adverse impacts on the setting of Roebuck Castle, The Glebe and Crannog Lodge.
- Lack of consultation with UCD students and local residents.
- The disused running track site at the campus is closer to the N11 and more suitable for student accommodation due to proximity to public transport.

Vincent Dowling

- The observer has an address at Louvain, Ardilea, Dublin 14.
- The observer's home is c. 20m from Crannog Lodge.
- The development would result in the construction of high rise buildings on Roebuck Road, overlooking and having a devastating impact on the observer's home.
- The UCD campus development plan, on which the application is based, has no independent status. It has never been subject to public scrutiny or approved by any outside body.
- The height of the development is not warranted by lack of availability of land at the UCD campus. The extensive nature of the campus provides an opportunity for alternative types of development.

- Development should not impact or overshadow Roebuck Castle. Proposed design is not suitable for this context. Also impacts on The Glebe and Crannog Lodge. Development would not have a 'neutral' impact on these buildings.
- Development is out of keeping with the sensitive residential area of Roebuck Road. Proposed design is similar to that of a retail, business or industrial park. The drawings do not indicate the development in the context of the surrounding 2 storey residential development on Roebuck Road. Adjacent development at the corner of Mount Anville Road has a height of 3 stories over retail and car park. Proposed scale of development should be located at the centre of the campus rather than at the periphery.
- The proposed new entrance to UCD from Roebuck Road serves no purpose. Development would result in a new village and main university entrance in a settled residential area. Public notices do not refer to this aspect of the development and are therefore invalid. Loss of existing boundary wall to Roebuck Road is unacceptable.
- Development would generate additional traffic and parking demand. Proposed cycle parking is welcomed.
- Applicant should assess impacts on the ecology and woodland of UCD.

Jim & Maura Hegarty

- The observers have an address at The Palms, Roebuck Road, Dublin 14.
- The application should have been lodged first with DLRCC.
- Lack of consultation with local residents.
- 10 year permission is excessive. Construction impacts on residential amenities.
- Excessive height of development in a residential area.
- Excessive density of development.
- Development is too close to Roebuck Road. It should be 80-100 feet back from the road.
- Development would result in traffic congestion and parking demand in the area. Commercial development on Roebuck Road would result in increased pedestrian activity and traffic hazard.
- EIAR does not consider impacts on The Palms.

- Adverse impacts on residential amenities due to overshadowing, light pollution, noise from student activities.
- Adverse impacts on property values.
- Heritage impacts on a protected structure and existing woodlands within the campus.
- Development would exacerbate existing flooding in a dip on Roebuck Road.

Richard & Anne Greene

- The observers have an address at The Palms, Roebuck Road, Dublin 14.
- The application should first have been made to DLRCC, as is normal for similar projects in UCD.
- Lack of consultation with local residents.
- 10 year permission is excessive. Construction impacts on residential amenities.
- Excessive height and density in a residential area. Development would set an undesirable precedent.
- Development is too near Roebuck Road. It should be set back 80-100 feet from the road.
- Traffic congestion. Traffic hazard at entrance to Roebuck Road due to increased pedestrian activity.
- Development will generate additional parking demand outside the campus.
- EIAR does not consider impacts on The Palms. Adverse impacts on residential amenities due to overshadowing, light pollution, noise from student activities.
- Adverse impacts on property values.
- Adverse impacts on protected structures and woodlands.
- Adverse impacts on recreational amenities at UCD.
- Development would exacerbate existing flooding at the dip on Roebuck Road.
- An oral hearing is requested.

Joan Fox

- The observer has an address at The Palms, Roebuck Road, Dublin 14.
- This is a copy of the observation submitted by Richard & Anne Greene, as summarised above. However, the submission does not request an oral hearing.

Marie Pinteau

- The observer has an address at The Palms, Roebuck Road, Dublin 14.
- This is a copy of the observation submitted by Richard & Anne Greene, as summarised above. However, the submission does not request an oral hearing.

Nicola Winters

- The observer has an address at Louvain, Ardilea, Dublin 14.
- Significant traffic impacts, exacerbation of existing traffic congestion on Roebuck Road.
- Adverse impacts on visual amenity. Development is out of keeping with the scale and character of the area.
- Alternative options should have been considered by UCD.

Kevin McDonagh & Aileen Cosgrove

- The observers have an address at Roebuck Castle, Clonskeagh, Dublin 14.
- SHD process disenfranchises local residents.
- Excessive scale of development is disproportionate to surrounding residential development and to the current layout of UCD where tall buildings are located towards the centre of campus rather than at the periphery.
- Impacts on the protected structure Roebuck Castle.
- Adverse impacts on residential amenities of properties within Roebuck Castle estate by way of visual obtrusion, overlooking, overshadowing.
- No objection in principle to student accommodation at UCD. Note that 3 separate student residences have been permitted at the campus, ref. D04A/1503, D08A/0603 and D13A/0404, which cater for a combined total of c. 1,000 students. Scale of proposed development in addition to permitted residences would result in a 'student ghetto' within the UCD campus with adverse impacts on the surrounding neighbourhood due to anti-social behaviour, noise pollution and traffic congestion.
- Lack of engagement with local residents by UCD.
- Traffic congestion, exacerbation of existing traffic on Roebuck Road and Clonskeagh Road.

- Question if existing services in the area have capacity for the development, particularly surface water drainage. Roebuck Road is flooded every year after heavy rainfall.

Helen & Brian Cathcart

- The observers have an address at Louvain, Ardilea, Dublin 14.
- Excessive height of development, overlooking and out of scale with existing bungalows at a distance of c. 20m.

Cllr Deirdre Donnelly

- Development of student accommodation at the UCD campus is welcome.
- Proposed 10 storey height is unacceptable for the area.
- Proximity to the perimeter of Belfield. Overlooking of adjacent residential properties, particularly Roebuck Castle estate. Visual impacts on Louvain and Roebuck Road. An alternative site within the UCD campus should have been chosen.
- Proposed construction entrance to Fosters Avenue is unnecessary and will create further traffic problems on one of the busiest roads in Dun Laoghaire Rathdown.

Cllr Barry Saul

- The observer has an address at Thornhill Road, Mount Merrion, Co. Dublin.
- A local area plan for UCD was proposed by Cllr Barry Saul and passed unanimously in April 2016 by all DLRCC councillors. This brought a strategic planning approach to UCD and involved local councillors, residents and stakeholders. It must be taken into account by ABP.
- Development will create extra traffic on already overloaded local infrastructure.
- Proposed height is excessive in a 2 storey area.
- Development will result in a student population bigger than most towns. This is unsustainable in a mature residential area.
- Ongoing issue of overspill parking from UCD in the local area will be exacerbated.

- Observer does not object to the scale and quantity of the student accommodation but considers that it is in the wrong location and should be moved further back into the campus to reduce impacts on mature residential areas.
- The submission is accompanied by a copy of a motion agreed at a Council meeting on 23rd October, which supports local residents' concerns in relation to the subject application.

Cllr Donal Smith

- The observer has an address at Roebuck Castle, Clonskeagh, Dublin 14.
- Observer generally supports the provision of more student accommodation at UCD.
- Proximity of Blocks A and B to Roebuck Castle estate. Adverse impacts on residential amenities due to scale, height, visual obtrusion, overlooking. Blocks A and B should be substantially reduced in height or omitted from the development.
- Block F should be omitted. It would dominate Roebuck Road and is out of keeping with the character of the road, which should be preserved. It dominates and detracts from the setting of the protected structure Roebuck Castle. Its location is not appropriate for a gateway entrance to UCD. It would damage the visual amenity of Louvain and The Palms.
- Development is inconsistent with the historic pattern of development at UCD, which places tall buildings in the centre of the campus. There is adequate space within the campus to locate tall buildings elsewhere, with less impacts on residential and visual amenities.
- Any permission should be subject to a condition requiring traffic control measures within UCD to prevent additional traffic as a result of the development from accessing Fosters Avenue or Roebuck Road between 7.00 -10.00 am Monday to Friday. There is already serious congestion at Roebuck Road and Fosters Avenue during peak hours.
- The number of surface car parking spaces provided should be substantially reduced in order to preserve green areas in UCD and to promote use of public transport. However, seeks no reduction in disabled parking provision.

Ardilea Residents Association

- The observation has been submitted by BPS Planning Consultants on behalf of Ardilea Residents Association. The main points made may be summarised as follows.

Block F and Roebuck Road

- Block F at 25,603 sq.m. GFA is nearly twice the size of Blocks B, C, D and E and is over 10,000 sq.m. bigger than Block A, the second biggest block and is 8 stories high. There is no justification for this scale of development.
- Block F would impact forcefully and negatively on the area due to its mass and scale. It would be overbearing, incongruous and visually obtrusive. It would not respect the established character of existing student residences within the campus and of the surrounding residential areas and would be a significant negative intrusion on the skyline. Block F2 has a maximum height of 29.22m at 8 stories. The national paediatric hospital on Eccles Street, Dublin 7 was refused at a height of 36m in an inner city context.
- The proximity of Block F2 to Roebuck Road increases impacts. A setback should be provided. The existing visual quality of the Roebuck Road corridor should be retained. Potential 'wind tunnel effect' on Roebuck Road as a result of the height of Block F2.
- Adverse impacts on residential amenities due to overbearing, visual obtrusion, overlooking at close proximity to properties within The Palms and Louvain. A cross section should be submitted indicating the relationship of this part of the development to Louvain and The Palms.
- The other amendments to the Roebuck Road boundary increase the visibility of the scheme from the public realm and worsen the negative visual impact on Roebuck Road. The existing public footpath is adequate and there is no need for the proposed excessive footpath widening. The proposed change of use and widening of an existing pedestrian gateway into Crannog Lodge is to create a landmark gateway to UCD. This is unnecessary as there is an existing pedestrian entrance serving UCD / Roebuck Road and no evidence has been submitted to demonstrate that this is inadequate to serve pedestrian capacity. Pre-planning

concerns raised by ABP in relation to this aspect of the development have not been addressed. The entrance would encourage pedestrian traffic in the area, with consequent impacts on residential amenities.

- Development is not in accordance with development plan policy on protected structures and DOE guidance on architectural heritage, due to adverse impacts of Block F on the settings of the protected structures Roebuck Castle and Glebe Lodge and on Crannog Lodge. The conservation report submitted does not justify these impacts. The design does not adequately address concerns raised by ABP at pre-planning in relation to this issue. The conservation report submitted by the applicant does not provide a detailed expert conservation opinion on the development. It finds that the development would have 'neutral' impact although it would alter a sensitive aspect of the environment. The retention of trees and additional screening and landscaping as mitigation measures should not change the impact to 'neutral'. The assessment considers that the development is justified on the basis that its scale and density are necessary for the satisfactory utilisation of the resources of UCD. The development is not adequately justified on this basis.
- Block F would result in a significant loss of parkland and woodlands. The proposed conversion of this area to landscaping would result in a loss of trees and impact on the existing sylvan setting, with consequent impacts on visual and residential amenities.
- Proposed density of Block F is excessive and would represent overdevelopment of this part of the site. The current proposal for Block F2 is different to any of the previous, lower density, alternatives considered in the design masterplan, as discussed in EIAR section 4.2.2. The current proposal is for 506 more beds than any of the other options, which all provided a reasonable setback to Roebuck Road. The submitted figures dilute the density and plot ratio of Block F within those of the overall scheme. The density of Block F should be assessed individually given its sensitive site context. There is no adequate justification for the quantum of development at Block F given the amount of land available elsewhere at UCD.
- The scale, bulk and height of Block F would contravene development plan policies, including section 8.2.3.4 "Additional Accommodation in Existing Built-up

Areas' and policy RES12. Block F does not comply with section 3.4 of the DL RCC Building Height Strategy, which states that heights should graduate from tall in the middle of the campus to lower height on sensitive boundaries, or with the 'Landmark Building' criteria. Block F2 should be assessed as premature pending a LAP for UCD / Clonskeagh, during which the applicant could request the site to be afforded 'Landmark Building' status.

- Block F2 would have an adverse impact on the future Eastern By-pass due to its scale just 12m from the route corridor. It would visually dominate this section of the road.
- The EIAR assessment of landscape and visual impacts, including photomontages, underestimates the impact of the development. It provides only limited assessment of impacts on Roebuck Road and focuses on impacts within the campus. It includes summer vegetative screening, which will not provide screening year round. There are discrepancies between the elevations in the photomontages the submitted drawings. It is submitted that visual impacts on Roebuck Road and Louvain will be significant and negative.

Traffic and Parking

- Ardilea estate has experienced overflow parking from UCD for many years. The development will exacerbate this issue due to inadequate parking provision to serve the real demand that will arise from students living on the campus that own cars and from students commuting to the campus by car. It is not reasonable to assume that all of the future residents won't have cars.
- Proposed parking provision is contrary to development plan SLO148, which aims to identify and address on-going parking issues around the UCD campus.
- The applicant has not addressed concerns raised by ABP at pre-planning stage in relation to parking.
- Proposed construction access at Fosters Avenue will result in traffic impacts.

Noise Impacts

- The observers' properties are the nearest noise sensitive receptors to the development. The build will be on a continuous basis within 30m of their gardens. A 10 year permission is sought.
- The EIAR does not include baseline noise monitoring at Roebuck Road.
- Plant at roof level of Block F could result in operational noise impacts, including during night time.

Cumulative Impacts

- Development would result in unacceptable cumulative impacts in relation to noise and vibration, visual impact and impacts on cultural heritage during the 10 year construction period.

Recommendations

- The Board should make a split decision refusing permission for Block F and in particular Block F2 in Phase 3 and permitting the remainder of the development. The applicant could reapply for a revised Block F during the development of Phases 1 and 2 of the scheme.
- Block F2 should be refused for reasons relating to contravention of the development plan building height strategy; adverse visual impacts; contravention of development plan policy on student accommodation; adverse impacts on the settings of protected structures and on the streetscape of Roebuck Road, contravention of development plan policy on protected structures and DOE architectural heritage guidelines; loss of woodlands; overbearing visual impact on neighbouring residential properties; other adverse impacts on residential amenities.
- Alternatively, the Board should require the applicant to address the following issues.
- Revised design of Block F to reduce impacts on visual and residential amenities and reduce impacts on protected structures. Block F should be reduced in scale, massing and length. Repetitive elevations should be broken up.

- Reduce height of Block F2 to 4 storeys maximum with the 4th storey set back to reduce visual impact. Reduce height of the top storey of Block F2 from 5.1m to 3.075m and all building elements projecting above parapet level should be removed.
- Provision of a substantial setback from Block F2 to Roebuck Road, to allow for planting and graduation of building height to reduce visual impacts on Roebuck Road and Ardilea. Existing boundary wall to Roebuck Road should be retained and / or upgraded. One main pedestrian entrance should be permitted between Roebuck Road and the UCD campus.
- Applicant to demonstrate how landscaping and tree planting can make UCD appear as a woodland park in views from Roebuck Road.
- Block F should have increased separation distances to protected structures.
- Increased separation distance >12m from the Eastern Bypass Road Corridor.
- Excess density and floor area in Block F should be allocated to other blocks within the scheme, located further within the campus. Taller buildings to be permitted further into the campus.
- The quantum of accommodation in the entire scheme reduced to c. 2,500 beds, to reduce the height and bulk of the scheme.
- The quantum of parking provided should be sufficient to serve all development.
- Conditions to be imposed requiring construction traffic to enter / exit the site at off-peak times.
- Specific noise conditions should be imposed, to limit construction noise to 60 dB(A). Baseline noise monitoring to be carried out at Roebuck Road to facilitate assessment of construction noise impacts. A noise and vibration management plan should be required. Also a condition requiring monitoring of operation noise from plant within the development.
- Conditions relating to the proposed Dust Management Plan, particularly for demolition works.
- Local residents to be consulted in relation to the Construction Management Plan and CEMP.
- Implementation of mitigation measures set out in the EIAR.

John Tingle and Jodie Walsh

- The observers have an address at Louvain, Roebuck Road, Dublin 14.
- The observers' family home is located directly across from the Roebuck Road entrance to the development, 15m away from the UCD boundary wall.
- The public notices are invalid as they do not adequately describe the development as a radical alteration to the area and a new 'Gateway' to UCD.
- The observers were not consulted prior to lodgement of the application.
- Proposed design of Block F2 is totally inappropriate to its context and should be refused.
- Adverse impacts on the amenities of the observers' property due to overlooking and visual impacts. Development would impact on the observers' 'right to light'. Significant impacts during the 10 year construction period, including traffic impacts.
- The EIAR consideration of alternatives does not address any alternative in relation to Block F2. Should have considered alternative treatments of the frontage to Roebuck Road.
- Observers fundamentally disagree with the EIAR visual impact assessment of the impacts on views from Roebuck Road as 'neutral'. The assessment does not adequately illustrate potential impacts on the observers' property. View 6 from Roebuck Road is assessed as significant and negative.
- Adverse impacts on the settings of the protected structures Roebuck Castle and Roebuck Glebe.
- Development will create a new UCD presence on Roebuck Road with a new 'Gateway' to the campus. This is inadequate justification for the scale of the development at this location. The entrance should be a link resource and amenity for the local community as well as the campus. The existing boundary wall to Roebuck Road should be retained. One main pedestrian entrance should be permitted between Roebuck Road and the UCD campus.
- Development does not comply with the development plan Building Height Strategy. High rise buildings should be centrally located within the campus, not at the periphery. There are ample lands available elsewhere within the campus for the development of student accommodation on this scale.

- Development would result in the loss of trees and adverse impacts on existing woodlands.
- Minor amendments to Block F would not address the serious concerns of the observers. It should be substantially redesigned to reflect the suburban, historical, community and tertiary nature of the location on Roebuck Road, also to address the impacts on Roebuck Castle and surrounding residential properties.
- Block F should be assessed as premature pending the development of a LAP for UCD / Clonskeagh, during which the applicant can request that the site be afforded 'Landmark Building' status.
- Recommend conditions relating to construction activity, traffic, noise and dust impacts.

John O'Connor

- The observer has an address at Harlech Crescent, Clonskeagh, Dublin 14.
- There is insufficient variety in the elevational treatment. Use of colour coding as the only device to ensure each area has its own character is insufficient. The development is the size of a medium sized Irish town. A detailed design guide should be prepared as part of the masterplan approval process.
- An active street frontage should be provided to Roebuck Road to create a connection with the existing community and contribute to residential character and amenity. The development should not become a gated community divorced from its neighbours.
- Also need to create more active frontages at street level of several of the residential blocks.
- Consideration should be given to reducing the scale and height of Block F2 to ensure that it relates to the existing residential scale and character.
- Cycle parking provision should be increased to 1 per student, 50% of spaces covered and bicycle service and maintenance facilities provided.
- There should be a direct pedestrian route connecting Roebuck Road from the development site to the UCD bus terminal. Layout should have clear street / pedestrian routes. Proposed access roads appear to prioritise and encourage car usage. Should be prioritised for pedestrian usage.
- Insufficient provision of open space / public realm.

- Measures to mitigate the concentration of a large, transient community in one area, e.g. a minimum 10% of rental accommodation for university staff and their families or as general rental accommodation.
- More information required on how the development will comply with the principles of Universal Design.

Shane Ross T.D.

- On campus student accommodation is welcome as it would add availability to the rental market in surrounding areas.
- Concerns about the height of the development in proximity to 2 storey suburban residential areas. Also location of the development at the perimeter of the UCD campus.
- Proposed construction access from Fosters Avenue will exacerbate existing traffic problems at this location and should be relocated.
- Permission should be refused due to these serious concerns.