

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

20 September 2017

Re: Strategic Housing Development Application to An Bord Pleanála

Application for a 10 Year Permission for a Student Accommodation Development Comprising 512 student accommodation units (3,006 Student Bedspaces) in 7 no. Blocks together with a Student Facilities Building comprising a total 98,275 sqm GFA above ground level; Basement level (including underground Car Parking comprising 637 no. spaces and ancillary plant and storage areas), 3 no. ESB Substations, New Bicycle parking for c. 2,104 no. spaces, New surface level Car Parking (within a net increase of 315 no. surface spaces); Demolition of existing buildings 2,367sqm and all associated site & development works – University College Dublin, Belfield, Dublin 4

ABP Reference: TC 06D.TC0001

Dear Sir

This application for a 10 year permission is made to An Bord Pleanála under the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made pursuant to a Notice of Pre-Application Consultation Opinion issued by the Board dated 22 August 2017.

This correspondence identifies the following documentation and information submitted with this application:

1. The documentation submitted in compliance with articles 297 and 298 of the Planning and Development Regulations 2001 to 2017, as amended; and,
2. The information is made pursuant to the Board's Notice of Pre-Application Consultation Opinion dated 22 August 2017, as required under article 297(3) of the Planning and Development Regulations 2001 to 2017, as amended.

1. Article 297 and 298 Requirements

The documentation required under article 297 is identified below:

- **297(1)** – The planning application form is submitted herewith
- **297(2)(a)** – UCD is the owner of the site and as such a letter of consent is not required.
- **297(2)(b)** – A copy of the newspaper Notice published in the Irish Daily Star on 20 September 2017 is attached herewith.
- **297(2)(c)** – Drawing No. 15-052_3.1_001 at a scale of 1:1000 and incorporating the requirements of parts (i) to (iv) is submitted herewith.
- **297(2)(d)** – Evidence from Irish Water that it is feasible to provide services is included in the EIAR as Appendix 13A.
- **297(2)(e)** – It is proposed to connect to a public sewer. As such, there is no requirement to submit documentation under this provision.
- **297(2)(f)** – A full Schedule of Drawings and documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **297(2)(g)** - Section 96 of the Planning and Development Act 2000 does not apply to student accommodation. As such, there is not requirement to submit documentation under this provision.
- **297(2)(h)** – Part V of the Planning and Development Act 2000 does not apply to student accommodation. As such, there is not requirement to submit documentation under this provision.
- **297(2)(i)** – UCD is the owner of the site and as such a letter of consent is not required.
- **297(2)(j)** – The appropriate statutory fee of €80,000, being the maximum fee payable, is attached herewith.
- **297(2)(a)** – UCD is the owner of the site and as such a letter of consent is not required.
- **297(3)** – Section 2 below provides a statement of proposals to address the matters set out in the Board’s Notice of Pre-Application Consultation Opinion dated 22 August 2017.
- **297(4) and 298(1)** – A full Schedule of Drawings and documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **298(2)** – There are 2 no. Protected Structures within the application boundary, namely Roebuck Castle and Roebuck Glebe. Demolition of buildings with a total floor area of 5,291 sq m is proposed in the vicinity of Roebuck Castle, including: Roebuck Offices (former Residence Building); a modern extension to Roebuck Castle (a Protected Structure); Southern Courtyard Range; former Chapel; outbuildings and an academic building (UCD Confucius Institute building). No further works are proposed to Roebuck Castle (a Protected Structure), or Glebe Lodge (Protected Structure). A detailed Architectural Conservation assessment has been prepared by Robin Mandal, Grade I Conservation Architect, and is included in the EIAR. A supplementary Architectural Conservation

Report addressing the matters raised in the Board's Opinion is also submitted herewith. The matters raised in the Board's Opinion are addressed in Section 3 below.

It is noted that the application is accompanied by an Environmental Impact Assessment Report (EIAR), and an Appropriate Assessment Screening Report (Stage 1). A Non-Technical Summary (NTS) of the EIAR has been prepared and also accompanies the application.

2. Statement of Proposals to Address Issues Raised in the Board's Notice of Pre-Application Consultation Opinion

The Board's Opinion of 22 August 2017 identified the following:

- 1. Issues to be addressed in the documents submitted with the application.** The Board's Notice stated that the documents submitted require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development, and identified those matters in its Notice. These issues have been comprehensively addressed in the drawings, documents, EIAR and Appropriate Assessment Screening Report submitted with the application. Section 3 below provides a statement of the manner in which these matters have been addressed in the documentation submitted.
- 2. Specific Additional Information to be submitted with the Application.** The documentation submitted with this application is listed in Section 1 above and on the separate Schedule of Documents. This information includes all of the specific items identified in the Opinion.
- 3. Authorities to be notified of the making of the application.** Copies of the letters sent to these authorities notifying them of the application under section 8(1)(b) of the Act are submitted with this application.

3. The Board's Opinion – Issues Addressed in the Submitted Documentation

The Board's Opinion identifies matters to be addressed in the documents submitted with the application. These matters have been addressed in the drawings, documents and Environmental Impact Assessment Report submitted with the application. To assist the Board and any interested parties in assessing the application the following sections provide a summary of proposed amendments where proposed, a summary of the manner in which the matters have been addressed in detail and incorporated into the drawings and documents submitted, and where the issues have been addressed in detail.

3.1 Relationship of Blocks A and B to Roebuck Castle Estate

Item 1 states: *'Further consideration should be given in relation to the design rationale/justification of Blocks A and B at application stage which should address matters relating to the potential, or perceived, impacts on the adjacent residential development, Roebuck Castle. These include proximity to dwellings in*

Roebuck Castle; height; extent of the blocks when viewed from Roebuck Castle; elevational treatment/expression; overlooking, and visual amenity. You may wish to consider, subject to the further consideration of this matter, an amendment to the documents and/or design proposals for these blocks. In such an instance, a design/planning rationale reflecting the above as it relates to any new design proposals, may be submitted at application stage.'

A detailed response to this Item has been prepared by Reddy Urbanism and Architecture in the attached document titled ABP Pre-Application Consultation Opinion Reddy A+U Response.

Specific design proposals incorporated to address these issues include changes to the massing and materials used in the elevational treatment and expression of Blocks A and B, in particular to reduce the linear and potentially repetitive expression of the façade modules and to mitigate the perceived massing, scale and visual impact as viewed from Roebuck Estate, as follows:

- The rhythm of the facades has been further modulated with increased vertical emphasis the individual elements of the blocks (see drawings contextual site section M-M, N-N & O-O)
- The various elements of the façade have been separated into brick framed elements separated by curtain wall treatment.

It is noted that the facades of Blocks A and B are at distances of 30-60m from the boundary of the Roebuck Castle Estate.

It is submitted that the above responses and the submitted documents and drawings have addressed the substantive issues raised by the Board, incorporating design amendments as appropriate and providing a robust justification for the proposed development now submitted. In the event that the Board considered that further design refinements or modifications were required to further assist in addressing any substantive issues it is respectfully submitted that such modifications could be incorporated by condition.

3.2 Relationship of Blocks F1 and F2 to Protected Structures

Item 2 states: *'Further consideration of the architectural conservation issues, in the form of an architectural conservation report and justification of potential impacts of the design of the proposed Blocks F1 and F2, given their proximity to Roebuck Castle Protected Structure. Design decisions should address elevational treatment, height and separation distances and should be informed by the requirement to protect the character and setting of the protected structure. Further consideration in the architectural conservation report should include consideration of all protected structures on the subject site. This may require possible amendment to the documents and/or design proposals submitted.'*

A detailed response to this Item has been prepared by Robin Mandal Conservation Architect and Reddy Urbanism and Architecture in the attached documents titled:

- An Bord Pleanála Pre-Application Consultation Opinion prepared by Reddy A+U Response.
- Conservation Report on the proposed development of Student Accommodation at University College Dublin, Belfield, Dublin 4, prepared by Robin Mandal Conservation Architect.

Specific design proposals incorporated to address these issues include:

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- The provision of a more neutral colour palette for Block F1 to acknowledge the heritage context and materiality of Roebuck Castle.

It is submitted that the above responses and the submitted documents and drawings have addressed the substantive issues raised by the Board, incorporating design amendments as appropriate and providing a robust justification for the proposed development now submitted. In the event that the Board considered that further design refinements or modifications were required to further assist in addressing any substantive issues it is respectfully submitted that such modifications could be incorporated by condition.

3.3 Relationship of Blocks F2 to Roebuck Road

Item 3 states: *'Further consideration is required in respect of the documents (design rationale and detailed drawings/design proposals) relating to Block F2, adjacent to Roebuck Road. This consideration should address potential impacts and should provide a detailed/robust planning rationale regarding scale, height, extent of elevations and elevational treatment. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.*

A detailed response to this Item has been prepared by Robin Mandal Conservation Architect and Reddy Urbanism and Architecture in the attached documents titled:

- ABP Pre-Application Consultation Opinion Reddy A+U Response
- Conservation Report on the proposed development of Student Accommodation at University College Dublin, Belfield, Dublin 4

Specific design proposals incorporated to address these issues include:

- Amendments to elevation of Block F2 including the removal of the 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.

It is submitted that the above responses and the submitted documents and drawings have addressed the substantive issues raised by the Board, incorporating design amendments as appropriate and providing a robust justification for the proposed development now submitted. In the event that the Board considered that further design refinements or modifications were required to further assist in addressing any substantive issues it is respectfully submitted that such modifications could be incorporated by condition.

3.4 Transportation Matters

Item 4 states: *'Further consideration of, and if necessary, further justification for, the quantum of car parking spaces proposed. In particular, justification should be provided in relation to the surface car parking proposed at the Little Sisters Car Park (to be extended) and the proposed car parking at the School of Law. In addition, other traffic and transportation matters that should be addressed at application stage include, inter alia, the following: public footpath facilities along Roebuck Road site*

frontage, and the proposed Dublin Eastern By-Pass Reservation. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.'

3.4.1 Car Parking

This response has been prepared by Arup and addresses the following matter raised by the Board:

'Further consideration of, and if necessary, further justification for, the quantum of car parking spaces proposed. In particular, justification should be provided in relation to the surface car parking proposed at the Little Sisters Car Park (to be extended) and the proposed car parking at the School of Law...'

The proposed development adheres to UCD's Travel Plan 2016-2021-2026 aim to balance the amount of car parking in each cell; increase the quantum of managed visitor spaces within UCD; provide a limited number of dedicated spaces for student residence within UCD and maintain existing quantum of permit parking. The total number of car parking spaces throughout the UCD campus is within the targeted maximum number of spaces set out in the travel plan to 2026 which assumes that external transport improvements are achieved.

3.4.1.1 UCD Sustainable Transport Strategy

UCD Travel Plan 2016-2021-2026

UCD has adopted a UCD Travel Plan 2016-2021-2026, which has been prepared and agreed through the Commuting Review Group which includes representatives of UCD, the National Transport Authority (NTA) and Dun Laoghaire Rathdown County Council (DLRCC). The Plan addresses car parking provision for the campus in a holistic manner.

A key element of the Plan is that existing surface car parks located within the heart of the campus are to be replaced with a smaller number of managed car parks located at the periphery of the campus as part of the College's holistic approach to car parking and the enhancement of the campus' core as a high-quality pedestrian zone.

It is a core element of both the UCD Travel Plan 2016-2021-2026 and the UCD Strategic Campus Development Plan 2016-2021-2026 that car parking should be managed holistically across the whole campus to allow for a better management of impacts on the capacity of adjacent roads, and the mitigation of car parking overspill onto neighbouring residential areas.

In this regard, the proposed application includes the consolidation of car parks and the net addition of 10 car parking spaces across the campus as part of the implementation of the car parking strategy contained in the UCD Travel Plan 2016-2021-2026.

A key target of the UCD Travel Plan 2016-2021-2026 is to improve the sustainable mode share from 77% to 81% by 2026. This is guided by three core principles:

- Promoting Sustainable Travel Options;
- Encouraging Activity, Health and Wellbeing; and
- Developing an Accessible, Attractive and Welcoming Campus.

The main objectives with regard to the car parking strategy for the overall campus are:

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- To continue to manage car parking demand and levels of parking provision at a campus level;
 - To provide a limited number of managed, dedicated, long-term 'car-storage' parking spaces for student residents 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 address existing parking demand issues; and
 - To accommodate planned increases in campus population while maintaining the number of parking spaces with a 'commuting impact' at existing levels or reduce where possible, so as not to impact on the surrounding road network.

It has been agreed through the UCD Commuting Review Group, which includes DLRCC and the NTA, that the campus would require a maximum total of 3,568 in 2026. This maximum assumes the implementation of external transport schemes that will provide real alternatives to the private car for commuting to and from UCD.

Traffic Cells

Car parking within the UCD campus is managed over six traffic cells. The presence of barriers prevents the movement of traffic through UCD during peak times, therefore controlling the use of car parking throughout the campus. These cells allow for a better management of impacts on the capacity of adjacent roads, and the mitigation of car parking overspill onto neighbouring residential areas. By monitoring the number of cars entering and exiting each cell through the UCD Cordon Count surveys the required demand and associated provision can be managed. The traffic cells are identified in Figure 1.

Figure 1: UCD Traffic Cells



3.4.1.2 Car parking elements of the application

The UCD Student Residences Masterplan and the planning application now before the Board is integral to the implementation of the Travel Plan. The application includes proposals for the following car parking provision:

- New basement car park which will provide 637 spaces;
- The 'Little Sisters Car Park' will be increased by 225 spaces;
- New Sutherland School of Law car park with 100 spaces; and
- New surface level parking within the UCD Student Residence Blocks consisting of 87 spaces.

There are a number of spaces which are to be decommissioned as part of this planning application:

- 177 spaces at Merville / Glenomena Residences (Owenstown cell)
- 128 spaces at the former running track car park (R138 cell)

This results in a net increase of 10 spaces within the UCD campus. The revised allocation of car parking within the UCD campus following the completion of the UCD Student Residences Masterplan.

Table 1: Car Parking Provision

Car Park Name	Existing Spaces	Displaced Spaces	Remaining Spaces	Proposed changes	Total spaces
Owenstown Breakdown					
O1 (magnetic Observatory)	87	0	87	0	87
O2 (Little Sisters)	61	0	61	+225	286
O3 (Sutherland B)	72	-72	0	0	0
O4 (Sutherland A, C)	314	-314	0	0	0
O5 (Merville/Glenomena)	201	-20	181	-177	4
O6 (Roebuck Residences)	75	-75	0	0	0
O7 (Roebuck Offices)	10	-10	0	0	0
O8 (Roebuck Legal Education)	33	-33	0	0	0
O9 (Roebuck Rear)	69	-69	0	0	0
O10 (Roebuck Side and Glebe)	55	-55	0	0	55
O11 (Ashfield Residences)	86	-86	0	0	0
Other spaces beside buildings (main)	18	0	18	0	18

disabled)					
New Basement car park	-	-	-	637	637
New Sutherland School of Law surface park	-	-	-	100	100
New surface level parking (Block A, B, C)	-	-	-	18	18
New surface level parking (Roebuck)	-	-	-	60	60
New surface level parking (Block E, D)	-	-	-	9	9
Owenstown	1,081	-734	347	872	1,219
Richview	148	-	148	-	148
Clonskeagh	1,090	-	1,090	-	1,090
Nova	124	-	124	-	124
Rosemount	29	-	29	-	29
R138 ¹	1,086	-	1,086	-128	958
UCD Campus Total	3,558	-734	2,824	744	3,568

3.4.1.3 Compliance with UCD Car Parking Strategy

The present proposals are fully consistent with the aims for campus-wide car parking set-out in UCD's Travel Plan, in terms of quantum, location and type of parking.

Quantum of Parking

The proposals include the replacement of impacted existing spaces, the provision of additional car parking, as well as the decommissioning of existing spaces within the UCD campus (Owenstown Park and R138 traffic cells). These changes result in a net increase of only 10 spaces campus wide.

Location of Parking

The proposals include the relocation of a large number of existing surface car parking to a covered, managed facility within the basement of the student residences. The basement car park proposed can only accommodate 637 spaces, and therefore, in order to maintain the provision of car parking throughout the campus and in particular within the Owenstown Park cell, it is proposed that:

- The 'Little Sisters Car Park' will be increased by 225 parking bays;
- New Sutherland School of Law car park be constructed with 100 spaces; and

¹ reduction corresponds to decommissioning of spaces at the former running track car park

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- New surface level parking within the UCD Student Residence Blocks be provided consisting of 87 spaces.

This is consistent with the objective of consolidating car parking on higher-density facilities at the periphery of the campus core, thus enabling the creation of high-quality pedestrian and cycle areas at the heart of Belfield campus.

Type of Parking

The Travel Plan identifies the need to increase the availability of visitor (pay & display) car parking across the campus, with a particular deficit having been identified at the Owenstown Park traffic cell. The Travel Plan also identified the need to provide a limited number of dedicated student residence 'car storage' spaces.

3.4.1.4 Conclusion

The previous section shows that the extension of the O2 car park (Little Sisters) and the New Sutherland School of Law car parks are required to re-locate spaces that needed to be removed to accommodate the student residence development and facilitate the implementation of the UCD Travel Plan.

The proposals are in full compliance with the UCD Travel Plan 2016-2021-2026, in particular with the car parking strategy, in terms of quantum, location and type of car parking provided.

3.4.2 Construction Entrance Design and Access Arrangements

The Opinion refers to construction entrance and design arrangements. The issues raised by DLRC at the pre-application stage have been addressed in the application documentation, and summarised by Barrett Mahony Consulting Engineers, below:

It is proposed that a new temporary construction access will be provided at the Foster's Avenue and North Avenue junction, along the south eastern boundary of the campus - See drawing no. C1002. This is proposed so that the existing Nova UCD entrance, which has been used previously for construction traffic, and suffered damage as a result, will be protected and preserved from potential damage from construction vehicles. It is proposed that new traffic signals will be required on exiting the campus at this new junction, as well as some alterations to the existing traffic signals on Foster's Avenue and North Avenue.

A Stage 1 Road Safety Audit and separate Quality Audit was carried out on the proposals for the new junction and this did not indicate any recommendations for changes to the design. However, prior to preparation of detailed design drawings for the Stage 2 Road Safety Audit, discussions will be held with DLRC Roads Department to determine if further upgrades to the junction are required.

3.4.3 Public Footpath Facilities Along Roebuck Road

As noted in section 3.3, above, it is proposed to set back the boundary wall to Roebuck Road by c 2 m, and provide a plinth wall with railings and enhanced public realm within the site to enhance pedestrian safety and views into the development.

3.4.4 Eastern By Pass Reservation

The Opinion refers to the proposed Eastern By-pass reservation. The issues raised by DLRCC at the pre-application stage have been addressed in the application documentation. The following summary response has been provided by Barrett Mahony Consulting Engineers.

The Proposed Construction Entrance and haul road are temporary and, by definition, limited to the timespan of the Construction Contract. The haul road and parking hardstanding will be no more than stone fill placed and compacted to facilitate access for construction vehicles and parking for contractor's staff. No temporary structures will be involved and in the event that it was required to vacate the land to allow for construction of the Eastern bypass these temporary roads would not significantly increase the scope of demolition works required to clear the site. It should be noted that Specific Local Objectives in the DLRCC Development Plan 2016-2022 include promotion of potential short term uses of the reservation corridor.

The development is in accordance with the Suggested Control Measures (A) to (J) listed in Section 4 of the Easter Bypass Corridor Protection study 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 which houses student residences and related amenities is the closest block to the bypass reservation. The amenity spaces are located at ground floor and are therefore considerably lower than the proposed level of the road which will ensure that noise levels at this location are considerably lower than that generated by the road. We note that the amenity spaces are also orientated in the opposite direction to the road and face North.

The Building elevations facing the proposed Eastern Bye Pass are located 12m from the by-pass reservation. The facades will be constructed to provide the required sound resisting construction and opening sections will be restricted and ventilation strategies will take cognizance of the orientation and particular frontage to the by-pass route.

We anticipate that the road itself will have inherent acoustic screening as would be normal in such instances which would reduce the Db levels in addition to the acoustic protection envisaged above.

We note that noise mitigating screening as part of the landscaping works will be reviewed and considered if appropriate, prior to commencement of Eastern Bypass works.

The structure of all the new buildings, including Block F which is nearest the Corridor, will be reinforced concrete frame which has a relatively high tolerance to vibration. Pad footings will generally be taken down to Brown/black boulder clay layers which will assist in damping any ground borne vibration. During the detailed Design phase of Block F cognizance will be taken of any vertical alignment information available for the proposed road to ensure that the Block F foundations will be below the zone of influence of any future excavation associated with the roadworks.

(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 proposed bypass and will not impinge on access to it. The proposed site is currently accessed from Owenstown Park and alternative access can be provided from the main UCD Campus.

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

The extent of the road reservation provided based on current available information on the extents of Eastern Bypass has been overlaid on the proposed Student Residences Masterplan. It is noted that currently the distance of the closest building Block F of the Student Residences Masterplan is 12m from the Route Corridor. We note that it is likely that the closest feature of the new Bypass at this juncture will be remote due to the site topography, it is submitted that flexibility for the mainline design is not in any meaningful manner considered to be inhibited.

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

It is noted that currently the distance of the closest building Block F of the Student Residences Masterplan is 12m from the Route Corridor. It is intended that the building would be a stand-alone structure with foundations remote from the reservation. Whilst the topography of the road will be higher, at this stage no retaining walls would be required to construct Block F. As stated in (a) above all foundations will be designed so that they are outside the zone of influence of the roadway excavation.

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

Existing power and water services enter the Student Residences from both the UCD lands and from Fosters Avenue. Once planning permission for the student residences is achieved it is intended to proceed with the works in phases.

- Phase 1 will be Blocks D and E and the Fulcrum Student Services Building.
- Phase 2 will be the Blocks A, B and C.
- Phase 3 will be the Blocks F at Roebuck Castle.

Extensive enabling works are envisaged as part of the Student Residences Masterplan Phase 1 which is located adjacent the Sutherland School of Law and the Quinn School of Business. These works include the relocation of internal site services such as gas, water and IT infrastructure internally in UCD. It is not intended to re-route existing services from Fosters Avenue as part of the current Student Residences Masterplan phase 1. Alternative service provisions are available from the main Belfield Campus if required during the Eastern By-Pass construction works.

(F) Open space Provision.

The Student Residences Masterplan is intended to provide a new coherent residential quarter on the campus to meet the needs and requirements of a student resident population. Central to this masterplan concept is the principle of connection to the existing student residences, the campus amenity spaces and the creation of new student amenity spaces in the courtyard spaces, new external play areas, new external seating and study spaces. In addition, extensive tree planting and additions to the UCD woodland walks and internal pedestrian amenity tracks are envisaged as part of the Landscape Masterplan for the project. In summary extensive open space is afforded by the UCD campus which will be enhanced and increased as part of the Student Residences Masterplan. Refer to the Landscape Masterplan Drawing.

(G) Visual Impact.

It is noted that currently the distance of the closest building Block F of the Student Residences Masterplan is 12m from the Route Corridor. This building is proposed to be 8 Storeys at this location. This scale of development is considered appropriate at this location as the existing Roebuck Student Residences at this location are 7 storeys and there is no adjacent residential housing or low-rise development which would be adversely affected in terms of overlooking or overshadowing.

The photomontages of the development as proposed at this location indicate the building as having a significant and permanent effect on its setting. As noted at section (A) above, consideration will be given to the façade and building design at this location in the context of the eastern by pass. It is not considered that the Eastern By-Pass will have a negative effect on the building and appropriate landscaping provision will screen the Bye Pass from Block F and site. See Landscape Masterplan Drawing.

(H) Soil Disturbance.

Soil disturbance for the Bye Pass's anticipated cutting to cross the N11 is remote from Block F. Excavation and soil disposal to be carried out in accordance with current Irish and European Regulations.

(I) Groundwater Considerations.

New foundations for the development will be placed above Groundwater level based on Site Investigations works undertaken – see the site investigation report included as an appendix to the infrastructure report.

(J) Public Awareness.

The Eastern By-Pass And its route corridor are acknowledged. The applicant will also be the owner of the proposed development and is aware of the possible future provision of the Eastern Bypass Motorway Scheme.

UCD's Travel Plan and Strategic development Masterplan has taken cognisance of the Eastern By-Pass and the University is committed to a positive working relationship on sustainable travel with the TII.

The following is a summary of the key recommendations made in the report with regard to the student residences Masterplan:

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- It is intended that at the construction stage of the Student Residences, a temporary access to facilitate construction traffic and construction staff car parking would be located in the eastern by pass corridor off Fosters Avenue opposite North Avenue. The purpose of this access and the car parking is to provide a temporary access during the construction of the residences and to facilitate a reduction in construction traffic using the N11 access. UCD commit discontinuing the use of this access and to relocate construction staff car parking from this location in its entirety once notification is received by UCD from the TII that the Eastern By-Pass Corridor Scheme are scheduled to commence. This will ensure that no temporary or permanent works from this scheme will remain in the Dublin Eastern Bypass Corridor.
 - Alternative access to the student residences is provided from the main UCD Campus. Based on current available information, access from Fosters Avenue will be maintained following the completion of the Eastern Bypass
 - The Building elevations facing the proposed Eastern Bye Pass are located 12m from the by-pass reservation. The facades will be constructed to provide the required sound resisting construction and opening sections will be restricted and ventilation strategies will take cognizance of the orientation and particular frontage to the by-pass route.
 - It is anticipated that the road design will have inherent acoustic screening as would be normal in such instances which would reduce the dB levels in addition to the acoustic protection envisaged above.
 - Noise mitigating screening as part of the landscaping works will be reviewed and considered if appropriate, prior to commencement of Eastern Bypass works.

It is noted that the commencement of the Eastern Bypass is not provided for within the lifespan of the GDA Transport Strategy up to 2035.

3.5 Biodiversity

Item 5 states: *'Further considerations and details are required at application stage relating to biodiversity on the site. In this regard, the EIAR (EIS) should address, inter alia, the following: an assessment of the loss of trees and hedgerows onsite; a survey and assessment of breeding birds on the site, and an impact assessment on bats (where applicable, a copy of the NPWS Bat License obtained should be submitted with the application). Further details are required at the application stage relating to a site specific Construction and Environment Management Plan (CEMP), together with an updated Screening for AA Report to include details relating to the CEMP. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.'*

All matters raised in Item 5 have been addressed in detail in the EIAR and the Appropriate Assessment Screening Report. The preparation of these documents, and the incorporation of the responses to the matters raised, has been the subject of consultations with the DLRCC Biodiversity Officer and the National Parks and Wildlife Service Conservation Ranger.

The specific matters raised in Item 5 have been addressed in summary as follows:

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- A full ecological assessment of the loss of trees and hedgerows has been undertaken. The hedgerow has been evaluated as being of 'lower significance' using methodology from the Heritage Council (Foulkes et al., 2013). The loss of this hedgerow is evaluated as a minor negative effect. Mature trees comprise a mix of native and non-native species and no tree was evaluated as 'veteran' or 'overly mature'. The loss of the approximately 317 trees identified for removal is assessed as a minor negative impact in the ecological assessment. The band of woodland along Fosters Avenue is of high local value and is to be largely retained.
 - A survey of breeding birds was carried out on Tuesday August 8th 2017. This is within the broader breeding season. The approach, agreed with the DLRCC Biodiversity Officer, was to assume that all birds noted were breeding. All birds recorded were of 'low conservation concern' (Colhoun & Cummins, 2013). Breeding birds are mostly confined to areas where there is tree or shrub cover, although there is some activity in older buildings. No nests of Swallows or Swifts were noted during the survey. It was agreed with the Biodiversity Officer that artificial swift boxes would be built at suitable locations as part of the proposed development. A total of 9 boxes (with three nest holes per box) are to be installed. The locations and sourcing of nest boxes was discussed with Swift Conservation Ireland (see www.swiftconservation.ie).
 - An impact assessment on bats has been carried out and is included in the EIAR (Appendix 10.A). Following a site meeting and consultation with the NPWS Conservation Ranger, an NPWS Bat License was applied for and subsequently issued by the Licensing Section, Department of Culture, Heritage and the Gaeltacht (see Appendix A). The Conservation Ranger accepted the proposal for mitigation to provide alternative roost sites around Roebuck Castle and within the proposed buildings, and with measures to provide feeding opportunities for bats within the altered grounds at UCD.
 - A Construction and Environmental Management Plan is submitted with the application and has informed, and been informed by, the EIAR and the Appropriate Assessment Screening Report. Guidelines from Inland Fisheries Ireland (2016) have been incorporated into the Construction and Environment Management Plan. This includes ensuring that construction compounds and storage areas are well away from water courses.

3.6 Drainage

Item 6 states: *'Drainage details require further examination having regard to section 2.3.9 'Drainage' in the report of the Dun Laoghaire Rathdown County Council dated 27/07/17 and consultation with Irish Water.'*

The drainage details identified in section 2.3.9 of the DLRCC Report dated 27 July 2017 have been the subject of further consultation between Barrett Mahony Consulting Engineers and the Council's Drainage Division and Irish Water.

The itemised response to each issue raised is provided in the Barrett Mahony report attached herewith as Appendix B.

I trust that the application documentation is in order and I look forward to a favourable decision from the Board.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Declan Brassil', with a stylized flourish at the end.

Declan Brassil
Declan Brassil & Co.

Appendix A

**Copy of Derogation Licence in respect of Bat Species issued by
Department of Culture, Heritage and the Gaeltacht**



An Roinn
Cultúir, Oidhreachta agus Gaeltachta

Department of
Culture, Heritage and the Gaeltacht

Licence No.: DER/BAT 2017 - 123

**EUROPEAN COMMUNITIES (BIRDS AND NATURAL HABITATS) REGULATIONS,
2011 (S.I. No 477 of 2011)**

DEROGATION LICENCE

Granted under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, hereinafter referred to as “the Habitats Regulations”.

Licence

The Minister for Arts, Heritage and the Gaeltacht, in exercise of the powers conferred on him by Regulation 54 of the Habitats Regulations hereby grants to **University College Dublin c/o Enda Conaty, Project Engineer, Buildings and Services, University College Dublin, Belfield, Dublin 4**, supervised by **Brian Keeley B.Sc. (Hons) MCIEEM** a licence in respect of **Bat Species**. This licence authorises the following:

- (a) roost disturbance
 - b) damage or destruction of breeding sites or resting places;
- (“the authorised action(s)”).

This licence is subject to the terms and conditions set out overleaf.



Terms and Conditions

1. This licence is granted solely to allow the activities specified in connection with **Roebuck Lecture Hall (former chapel)** of **University College Dublin**, located at **Roebuck Castle**.
2. All activities authorised by this licence, and all equipment used in connection herewith, shall be carried out, constructed and maintained (as the case may be) so as to avoid unnecessary injury or distress to any species of **BAT**.
3. This licence may be modified or revoked, for stated reasons, at any time.
4. The mitigation measures outlined in the report are to be carried out.
5. **Monitoring**
Bat activity surveys of Roebuck Castle and its vicinity should be carried out annually during the months of June or July until three years after the demolition of the Roebuck Castle former chapel and/or the completion of the development of the proposed new student accommodation. Until the exclusion of the Leisler's bat roost in the former chapel is carried out, these bat activity surveys to include dusk emergence and dawn re-entry surveys of this roost. Reports of the results of these surveys to be forwarded to NPWS within a month of them being carried out.
6. **Installation of Heated Roost in Roebuck Castle**
The installation of a heated bat roost box at the location in the roof of the Roebuck castle extension indicated in the photograph included in the derogation licence application should be carried out as soon as possible; the specifications of the heated roost box to be as proposed in this application.
7. **Installation of Heated Roost in Gate Lodge**
The installation of a heated bat roost box in the roof of the Roebuck Castle gate lodge to be carried out as soon as possible; the specifications of the heated roost box to be as proposed in the derogation licence application.
8. **Installation of Bat Boxes on Trees**
The installation of three 2FSchwegler bat boxes on trees in UCD campus in the vicinity of Roebuck Castle should be carried out as soon as possible; the installation of these bat boxes to be supervised by a bat specialist.
9. **Installation of Bat Boxes on New Buildings**
A W1 Schwegler Summer and Winter Bat Box should be incorporated in a building in Phase 1 of the proposed Student Accommodation Scheme, and two 2FE Schwegler Wall-Mounted Bat Shelter bat boxes attached to buildings in the same phase of the proposed development; the location of these boxes to be agreed with the bat specialist.



10. Exclusion of the Former Chapel Bat Roost

The exclusion of the Leisler's bat roost in the former chapel at Roebuck Castle under the supervision of a licensed bat worker should be carried out in the September before the chapel is to be demolished; the local NPWS Conservation Ranger to be informed before such exclusion work is begun.

11. Supervision of Demolition Works

The demolition of the former chapel at Roebuck Castle, whenever it is carried out, should be supervised by a licensed bat specialist; the other buildings to be demolished should be examined by the bat specialist before their destruction, and if any evidence of their use by bats is found, a separate derogation licence to destroy the newly identified roost will have to be applied for to NPWS.

12. Inspection of Trees

Any trees to be removed should be inspected before removal by a bat specialist and if any bat roosts are located a derogation licence to destroy them should be applied for to NPWS.

13. Lighting

The lighting scheme for the proposed development should incorporate the measures to mitigate the impact of artificial lighting on bats set out in the derogation licence application, and should be agreed with, and signed off on, by a bat specialist.

14. The works will be supervised by a licensed bat specialist, **Brian Keeley**.

15. This licence shall be produced for inspection on a request being made on that behalf by a member of An Garda Síochána or an authorised NPWS officer appointed under Regulation 4 of the Habitats Regulations.

16. The local NPWS Conservation Ranger, **Terry Doherty, 087-6795862**, should be contacted prior to the commencement of any activity, and if bats are detected on site during the course of the work, under the terms of this licence.

17. Report

On completion of the demolition works at Roebuck Castle and the proposed Student Accommodation Scheme a report the containing details of the implementation of the conditions/mitigation measures set out above should be submitted to the National Parks and Wildlife Service. A second report to be submitted to NPWS at the end of the third summer following the completion of the proposed Student Accommodation Scheme with details of the bat monitoring carried out over the three summer after the completion of this development.





Gerry Leckey

(a person authorised by the Minister to sign on her behalf)

18th September 2017

Wildlife Licensing Unit
National Parks and Wildlife Service,
7 Ely Place,
Dublin 2
D02 TW98

NOTES (1 to 2).

- This licence is granted for the period specified and subject to compliance with the conditions specified. Anything done other than in accordance with the terms of this licence may constitute an offence.
- This licence applies to **bats** and to no other species.



Appendix B

Barrett Mahony Consulting Engineers Response to Item 6 of the Board's Opinion dated 22 August 2017

Memo

To : Declan Brassil & Company Ltd
Chartered Planning Consultants

Re: UCD Student Residences Masterplan.
Response to Queries included in DLRCC Report: Section 2.3.9- Drainage
DLRCC Ref: SHD/PAC/318/17
ABP Ref: PL06D.TC0001

Date : 14/09/2017

Query 1

A map showing the locations and sizes of existing and proposed catchments feeding into the Lake should be provided. Confirmation is required that the summary of Lake Catchment Areas in Table 2.1 of the Barrett Mahony Civil Engineering Infrastructure Report is the full designed catchment for the Lake. (Note: Drawing No. SK4000 P1 included in the appendices may satisfy this requirement if the catchments shown on this drawing are the full catchment extents).

BMCE Response

We confirm that Table 2.1 lists the full design catchment areas for the lake as also shown on drawing No SK4000P1 in Appendix I (e)

Query 2

Clarification as of where the runoff from the proposed Sutherland School of Law Car Park, Little Sisters Car Park and Construction Haul Road (referenced in footnote Table 2.1) will discharge to on both a temporary basis and on a permanent basis post any future development.

BMCE Response

These areas are mostly unpaved hardcore finished areas where surface water discharges directly to ground. Any paved areas in the car parks are designed so the run-off either drains to the adjacent unpaved hardcore finish or in some cases to bio-retention areas or trench soakaways as agreed with Punch Consultants as part of the SUDs audit process.

Query 3

Demonstration that the lake has been adequately sized for both existing and future development. Note: for the purpose of sizing the attenuation volume required and determining the maximum controlled runoff rate allowable, the limit of 2l/s/ha or Q_{bar} is the determining factor notwithstanding any greater runoff rate that might have been allowed for historical development.



BARRETT MAHONY
CONSULTING ENGINEERS
CIVIL & STRUCTURAL

BMCE Response

Table 2.5 in the BMCE Report and the associated Micro-drainage output in Appendix 1c gives the attenuation storage volumes for the full network including all other catchments discharging to the lake for the 100 year storm. Qbar has been used without growth factors in all cases as listed in the table along with catchment areas and impermeable areas.

Query 4

Clarification as to whether the TL of 24.30m (1% AEP event) includes allowance for climate change. If not, include allowance for climate change and recalculate freeboard.

BMCE Response

All TWLs quoted are based on the Micro-drainage output which all includes for 10% climate change.

Query 5

Decommissioning of Roebuck Student Residences attenuation storage not to occur until outlet from the Roebuck Student Residences has been diverted to the Lake.

BMCE Response

Agreed – the connection to the Phase 1 SW drainage network will be made before the Roebuck Attenuation tank is decommissioned

Query 6

Bioretention areas and swales to be designed in accordance with the recommendations of CIRIA C753 (The SuDS manual). No dimensions have been shown on Barrett Mahony Drawing No.C1205 PL1.

BMCE Response

Dimensions have been added to drg no C1205 in accordance with CIRIA C753.

Query 7

The provision of 50% coverage of green roofs does not meet with the minimum 60% coverage requirements as per the Council's Green Roof Guidance document. Municipal Services consider that the green roof coverage could be extended and would not be incompatible with the provision of photovoltaic panels. The 240 m³ (70% of total) of interception storage being provided by the rainwater harvesting system is based on the presumption of a regular demand. Given the proposed use of the development (student residences), year-round or even seasonal/holiday usage and occupancy may not be guaranteed. The Council considers that an increased provision of green roof coverage together with the other measures being proposed would be a more robust solution to achieving the interception storage requirement.

BMCE Response

The argument was that the 10% shortfall below the 60% figure was more than compensated for by:

- significant volumes of interception storage - the 240m³ Rainwater harvesting volume is 40% of the total volume of interception storage = 589m³. Even if this is discounted the balance = 349 still exceeds the minimum storage requirement of 259m³. It should also be noted that the UCD student accommodation has a lot of holiday occupancy.
- The provision of a large volume of treatment storage in the lake in the static volume below the 24.00mOD level. The GSDSDS allows treatment storage and interception storage to be interchangeable so the argument is made that the treatment storage provided by the lake more than compensates for the 10% shortfall in green roof

We had assumed from our last meeting with DLRCC on 12th Oct 2016 (B Egan & M O'Sullivan) that this argument had been accepted.

Query 8

Table 2.5 of the Barrett Mahony Civil Engineering Infrastructure Report details the proposed phasing. The applicant shall submit a more detailed assessment of the hydrobrake suitability of each of the phases, i.e. whether it is proposed to upsize the hydrobrake as each phase is completed. When considering the size of the hydrobrake for the final outflow, the applicant should demonstrate that a single large diameter orifice hydrobrake will provide the required level of flow control for the range of rainfall events.

BMCE Response

It is intended to upsize the Hydro-Brake as each phase is completed and Table 2.5 of the BMCE Report gives the Hydro-brake Specification for each phase along with Q_{bar} and TWL in the lake. The Microdrainage output in the appendices has been checked for the 100year storm which should be the worst case event given that Q_{bar} is used without multiplying by growth factors.

Query 9

In Section 2.4.1.1 of Barrett Mahony Civil Engineering Infrastructure Report ground permeability is reported as being of limited permeability. Municipal Services is of the opinion that the results included in Appendix iv of Appendix VI (Site Investigation report), though varied, offer more than "limited" permeability. The applicant should therefore reassess the viability of providing more direct infiltration. While the locations of the trial pits are not readable from the small-scale plan submitted, there may be a contradiction in the findings referred to above when further in Section 2.4.1.1 the applicant proposes infiltration for the runoff from the permeable gravel surfaces in the medium term surface car parks.

BMCE Response

We have adopted a cautious approach on ground permeability given that the underlying soils are mostly boulder clay. We had intended to carry out further permeability tests during the

construction phase (page 7 of the BMCE Report) and, if suitable, use discharge to ground under the permeable paving as this would be more sustainable and would be cheaper. For the purposes of the application we have proposed a drained gravel bed under the permeable paving which discharges to the surface water system and is considered an impermeable surface for the purposes of the attenuation and pipe network calculations.

Query 10

Micro Drainage Calculations have not been checked in any great detail at this stage. However, it is noted that surcharging is predicted within some surface water drainage runs. The applicant shall comment in more detail on these instances and assess the level(s) of surcharging and the possible flood risk either as a result of increased surcharge levels (if the predicted freeboard is marginal) or in the event of blockage or partial blockage of the sewers, and shall identify safe overland flow routes.

BMCE Response

The margin we have set on Microdrainage for flood risk warning is 0.3m . While the manholes are surcharged for the 30 year event none are at flood risk – this complies with the requirements of the GSDSDS Criterion 3. For the 100 year event most manholes are surcharged and 9 are at flood risk but none flood – this is also in compliance with the GSDSDS Criterion 3.

Section 3.4.2 of the Infrastructure Report assess the flood risk from these manholes in the event of storm events in excess of 100 years and concludes that the overland flow will be directed towards the road system and will not threaten buildings.

Query 11

A flood risk assessment should be carried out on the lake and should, notwithstanding the provision of a designed overflow, assess the consequences of possible uncontrolled overtopping.

BMCE Response

Refer to section 3.4.3 of the infrastructure Report for flood risk assessment in the unlikely event of both HydroBrake and overflow pipework blocking and the Lake overtopping.

Query 12

The applicant should consider the upgrading of the existing lake to include provision of a sediment fore bay, if not provided, to further enhance the performance of the lake in treatment of runoff.

BMCE Response

Response to above: there is a silt trap manhole on the outfall to the lake before the petrol Interceptor. More importantly the lake itself has a static volume far in excess of that required for treatment storage – as stated in the report a depth of 149mm is required to provide treatment storage for the whole catchment so with an average depth of say 0.6m the lake has four times the treatment storage volume required by the GSDSDS. A significant function of such treatment storage is to provide sufficient volume for settlement of suspended solids and so we would argue that providing a sediment forebay is unnecessary given the significant over provision of treatment storage provided by the lake.

Query 13



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CONSULTING ENGINEERS
CIVIL & STRUCTURAL

The applicant should provide an assessment of the current condition of the lake, which should include a summary of the maintenance history and records of any re-siltation that may have occurred.

BMCE Response

Section 2.6 of the infrastructure Report gives details of the history and maintenance of the Lake

Query 14

The applicant shall provide a dimensioned wayleave drawing for the proposed diversion of 60mm diameter surface water sewer. Cross sections shall be provided along length of wayleave showing the locations of all other utilities. Vertical and horizontal separation distances shall also to be shown.

BMCE Response

Refer to drawing No C1033 for cross sections along the wayleave. We are assuming a minimum 3m wayleave either side of the centreline of the pipe will be required from any adjacent structures.

A handwritten signature in blue ink that reads 'Brian Mahony'.

Brian Mahony BE CEng MIEI MStructE FConsEI
Chartered Engineer
Barrett Mahony Consulting Engineers