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**Department within KPMG:** *KPMG Future Analytics, Chartered Town Planning and Development Consultants*

An Bord Pleanála  
64 Marlborough Street  
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D01 V902

30 June 2021

**RE: Alternative Uses Justification Statement in support of a proposed Build-to-Rent Strategic Housing Development on lands associated with St. Laurence College, Wyattville Park, Loughlinstown, Co. Dublin.**

Dear Sir/Madam,

KPMG Future Analytics, 1 Stokes Place, St. Stephen's Green, Dublin 2 (Chartered Town Planning and Development Consultants), has prepared this Alternative Uses Justification Statement on behalf of Green Urban Living N11 Limited, 22 Ely Place, Dublin 2, in respect of a proposed Build-to-Rent (BTR) Strategic Housing Development (SHD) on lands associated with St. Laurence College, Wyattville Park, Loughlinstown, Co. Dublin.

The proposed development is described per the statutory notices pertaining to the planning application as:

*"The development will consist of the demolition of the existing AstroTurf and hardcourt area (totalling 2,812 sq.m) and the construction of a Build-to-Rent residential development (24,195 sq.m GFA) comprising 256 no. apartments (105 no. 1-bed, 145 no. 2-bed and 6 no. 3-bed) in 4 no. blocks ranging in height from 1 to 8 no. storeys above ground level including, and connected by, single storey podiums, and non-residential uses (totalling 604 sq.m GFA) and an AstroTurf pitch (2,242.4 sq.m). The development is described on a block by block basis as follows:*

**Block A (6,375 sq.m GFA):** *1 to 5 no. storeys over lower ground floor level apartment building with 59 no. apartments comprising 22 no. 1-bed apartments and 37 no. 2-bed apartments, all with associated private gardens/balconies. Block A also includes the provision of a crèche (363 sq.m GFA) with associated outdoor play area (101 sq.m) and a café unit (135 sq.m GFA) at lower ground floor level.*

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**Block B** (5,930 sq.m GFA): 1 to 7 no. storeys apartment building with 65 no. apartments comprising 39 no. 1-bed apartments, 23 no. 2-bed apartments and 3 no. 3-bed apartments, all with associated private gardens/balconies.

**Block C** (6,447 sq.m GFA): 1 to 6 no. storeys apartment building with 68 no. apartments comprising 22 no. 1-bed apartments and 46 no. 2-bed apartments, all with associated private gardens/balconies.

**Block D** (6,172 sq.m GFA): 1 to 8 no. storeys apartment building with 64 no. apartments comprising 22 no. 1-bed apartments, 39 no. 2-bed apartments and 3 no. 3-bed apartments, all with associated private gardens/balconies.

Provision of internal resident support facilities and resident services and amenities, including concierge, lobbies/lounges, communal workspaces, meeting rooms and a residents only gym and changing facility (totalling 946 sq.m) located at lower ground and ground floor levels; communal open space in the form of podium courtyards with play facilities (totalling 2,244 sq.m); and public open space with play facility (4,378 sq.m). Provision of a new AstroTurf pitch (2,242.4 sq.m) and associated floodlighting and 3m ball-stop netting over 2.4m perimeter fence; a bin store/vehicle shed (106 sq.m GFA); and a new vehicular and pedestrian entrance and associated road and footpath off Wyattville Park Road for St. Laurence College.

Access to serve the proposed development will be provided via a new multimodal entrance to the site from Wyattville Park Road together with a dedicated new entrance to serve the existing school. The development will include internal roads and footpaths; a pedestrian/cycle link from the N11 to Wyattville Park which will be accessible by the public and also facilitate access for emergency vehicles; and the partial demolition of the existing wall at Wyattville Park to facilitate access to the site and the temporary removal of part of the existing wall fronting the N11 at the southwestern corner of the site to facilitate construction access via the N11 slip road. The temporary construction access via the N11 slip road will be decommissioned and the associated boundaries and playing field finishes reinstated following the construction phase. 200 no. car parking spaces are provided in total, including 80 no. parking spaces at grade (50 no. residential parking spaces including 2 no. disabled parking spaces, 10 no. visitor parking spaces, 9 no. café parking spaces including 1 no. disabled parking space, 6 no. crèche staff parking spaces, 3 no. parent and child parking spaces and 2 no. car pool parking spaces); 60 no. residential parking spaces (including 3 no. disabled parking spaces and 10 no. electric vehicle parking spaces) below the podium courtyard between Blocks A and B; and 60 no. residential parking spaces (including 3 no. disabled parking spaces and 10 no. electric vehicle parking spaces) below the podium courtyard between Blocks C and D; 10 no. motorcycle parking spaces at grade; and a setdown area at grade. 583 no. bicycle parking spaces are provided for residents and visitors, including 9 no. short-stay bicycle parking spaces at grade and 574 no. bicycle parking spaces at ground floor level (202 no. residential spaces, 71 no. visitor spaces, 3 no. café staff spaces and 6 no. crèche staff spaces in 2 no. enclosed spaces in Block B; 5 no. residential spaces below the podium courtyard between Blocks A and B; 202 no. residential spaces and 80 no. visitor spaces in 2 no. enclosed spaces in Block D; and 5 no. residential spaces below the podium courtyard between Blocks C and D).

Planning permission is also sought for all ancillary site and development works above and below ground to facilitate the development and associated signage, including 10 no. stores (totalling 563.4 sq.m); 2 no. bin stores (totalling 96 sq.m);

*1 no. ESB substation (15.1 sq.m); 1 no. electric switchroom (7 sq.m); 1 no. telecoms room (4.3 sq.m); mechanical and electrical installations; 1 no. cold water storage tank and booster set room (75 sq.m); public lighting; retaining walls; boundary treatments; hard and soft landscaping; SuDS; green roofs; and water, surface water drainage and foul drainage works; and all associated site strip and excavation above and below ground.”*

In relation to development on institutional lands, the *Dún Laoghaire-Rathdown County Development Plan 2016-2022* (CDP) sets out that where no demand for an alternative institutional use is evident or foreseen on institutional lands, the Council may permit alternative uses. Furthermore, the CDP states that any proposed residential development shall have regard to the future needs of the school and allow sufficient space to be retained adjacent to the school for possible future school expansion/redevelopment. It is the purpose of this Alternative Uses Justification Statement to establish the future needs of St. Laurence College and its capacity to meet same.

### **Future Needs of St. Laurence College**

St. Laurence College is a Marianist school under the Le Chéile trust situated in Loughlinstown, a well-established residential suburb located approximately 5 km south of Dún Laoghaire and 6 km south-east of Sandyford (as the crow flies) (Figure 1).



*Figure 1: Aerial View of St. Laurence College with the Indicative Boundary of the Subject Site Outlined in Red.*

In recent years, the school's enrolment numbers have decreased. The latest data published by the Department of Education and Skills on individual schools shows that St. Laurence College enrolled 258 no. pupils in the 2020-2021 academic year which is considerably below their enrolment figures for previous academic years. In the past, the school has enrolled up to 500 no. pupils each year. It has been established that their ideal enrolment number is 350 no. pupils which is well within the school's capacity.

## Alternative Viable Uses

The subject site is located within Zoning Objective A of the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*, the objective of which is “to protect and/or improve residential amenity”. The range of uses which are identified as either Permitted in Principle or Open for Consideration Uses within Zoning Objective A are identified in Table 1 below.

Table 1: Uses Permitted in Principle and Open for Consideration within Zoning Objective A.

Permitted in Principle
Assisted Living Accommodation, Open Space, Public Services, <b>Residential</b> , Residential Institution, Travellers Accommodation
Open for Consideration
Allotments, Bring Banks/Bring Centres, Carpark, Caravan Park-Holiday, Caravan Park-Residential, Cemetery, Community Facility, <b>Childcare Service</b> , Cultural Use, Doctor/Dentist etc., Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Health Centre/Healthcare Facility, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light, Part Off-License, Office Based Industry <sup>a</sup> , Offices less than 200sq.m. <sup>b</sup> , Petrol Station, Place of Public Worship, Public House, Restaurant, Service Garage, Shop Neighbourhood, <b>Sports Facility</b> , <b>Tea Room/Café</b> , Veterinary Surgery

a: less than 200 sq.m. b: Where the use will not have adverse effects on the ‘A’ zoning objective, ‘to protect and/or improve residential amenity’.

In the context of Zoning Objective, A, the primary element of the proposed development, namely residential, is identified as being permitted in principle, while the crèche, café and AstroTurf pitch are identified as being open for consideration. The subject proposal will notably provide for a high-quality mixed-use development which will deliver much needed housing in an area that is well serviced and highly accessible.

In conclusion, no demand for an alternative institutional use is evident or foreseen, with St Laurence College’s ideal enrolment number well within the capacity of the school. A Social Infrastructure Audit, market appraisal and soundings exercise together with a desktop spatial analysis exercise were all carried out to inform this process. Having regard to the foregoing, an alternative use, such as that which is being proposed, would be permissible.

Yours faithfully,



Stephen M. Purcell MIPI FSCSI FRICS  
Director and Co-Head  
KPMG Future Analytics  
Chartered Town Planning and Development Consultants