

## 1.0 INTRODUCTION

### 1.1 Application Details

This chapter was prepared by Patricia Thornton (BSc. Surv) (MRUP). Patricia is a Director of Thornton O'Connor Town Planning, is a Corporate member of the Irish Planning Institute and has 22 No. years post-qualification experience. Patricia has experience in preparing and coordinating EIARs for a variety of projects and has also been involved in the coordination of a wide range of developments including residential and commercial developments.

This Environmental Impact Assessment Report (EIAR) has been prepared on behalf of Sandford Living Limited (the Applicant) in relation to a Large-scale Residential Development planning application at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7. This application principally relates to the demolition of c. 4,847.5 sq m of existing structures on site, the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m) and the provision of a residential scheme comprising 562 No. residential units, in addition to a creche, café/restaurant and community/cultural space.

The proposed development is described as follows as per the Statutory Notices:

*'Sandford Living Limited intend to apply for permission for a Large-Scale Residential Development at a c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.*

*The development will principally consist of: the demolition of c. 4,847.5 sq m of existing structures on site including Milltown Park House (880 sq m), Milltown Park House Rear Extension (2,031 sq m), the Finlay Wing (622 sq m), the Archive (1,240 sq m) and the Link Building between Tabor House and Milltown Park House Rear Extension to the front of the Chapel (74.5 sq m); the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m) and the provision of a single storey glass entrance lobby to the front and side of the Chapel (52 sq m); and the provision of 562 No. residential units comprising 6 No. three-bed courtyard houses and 556 No. apartment units (70 No. studios, 176 No. one-bed units, 267 No. two-bed units and 43 No. three-bed units).*

*Block A1 will range in height from 5 No. storeys to 8 No. storeys and will comprise 81 No. apartment units; Block A2 will range in height from 6 No. storeys to 8 No. storeys and will comprise 139 No. apartment units; Block B will range in height from 3 No. to 7 No. storeys and will comprise 74 No. apartment units; Block C will range in height from 4 No. storeys to 7 No. storeys and will comprise 151 No. apartment units; Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 30 No. apartment units; Block E will be 2 No. storeys in height and will comprise 6 No. courtyard type*

houses; and Block F will range in height from 5 No. storeys to 7 No. storeys and will comprise 81 No. apartment units.

The development also includes the provision of: cultural/community space within Tabor House (4 No. storeys including lower ground floor level) and the Chapel (2 No. storeys including lower ground floor level and mezzanine level) (1,698 sq m) with associated outdoor space (248 sq m); a café/restaurant (179 sq m) and a creche (375 sq m) within Block F with associated outdoor creche play area; ancillary residents' amenities and facilities (324 sq m) within Blocks B & C; and a single storey bin store and substation adjacent to Block F (101 sq m).

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 319 No. car parking spaces (288 No. at basement level and 31 No. at surface level); set down area for deliveries; bicycle parking; 22 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; hard and soft landscaping including public open space and communal open space; green/blue roofs; PV panels; substations; lighting; plant; lift cores and overruns; and all other associated site works above and below ground.

The proposed development has a gross floor space of c. 50,196 sq m above ground level over a partial basement (under part of Blocks A1 and A2 and under Blocks B and C) measuring c. 10,550 sq m, which includes parking spaces, bin storage, bike storage and plant'.

A fully detailed description of the project is set out in Chapter 3 of this EIAR. In addition, a Non-Technical Summary of the EIAR is provided in Volume 1 and relevant Appendices are provided in Volume 3.

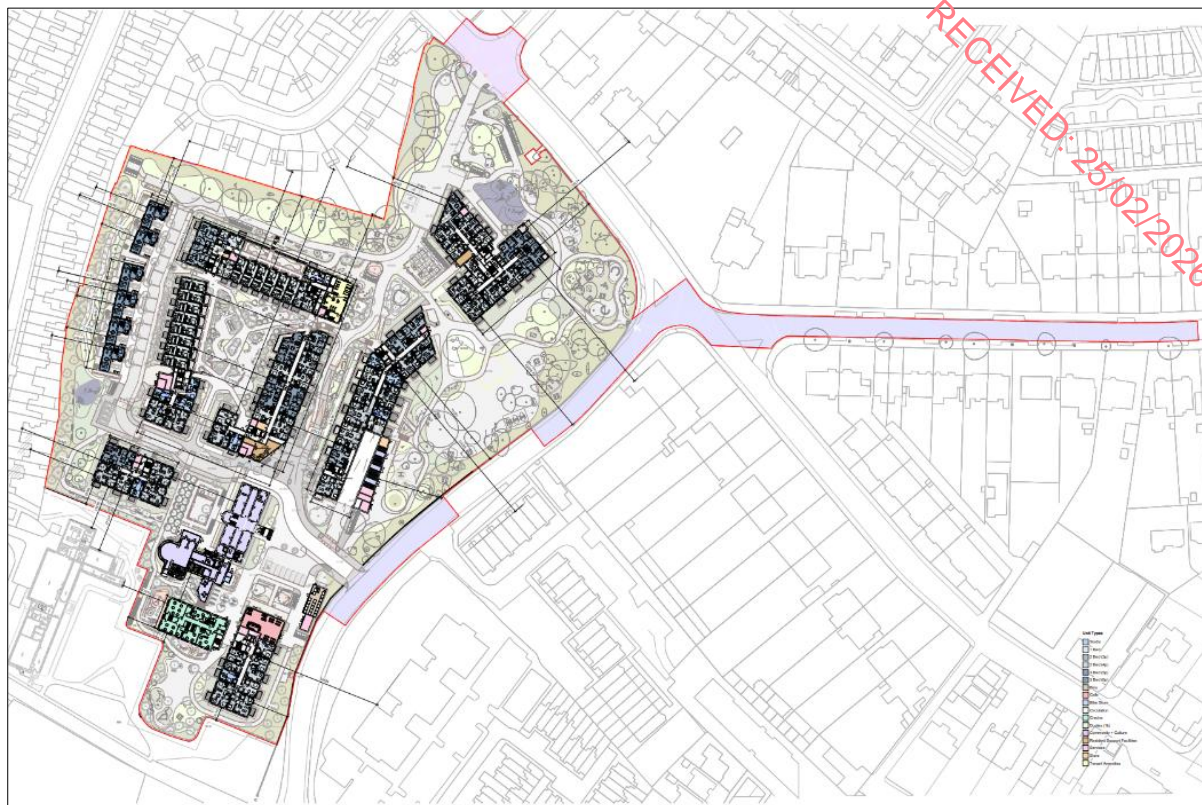


Figure 1.1: Site Plan of the Proposed Development

(Source: OMP Architects, 2025)

## 1.2 History of the Application Site

### 1.2.1 Previous Strategic Housing Development currently Subject to Judicial Review

A Strategic Housing Development (SHD) was previously permitted by An Bord Pleanála in December 2021 on the subject site for 667<sup>1</sup> No. dwellings (principally Build-to-Rent), a creche, communal internal amenity and facilities and public and communal open spaces, with heights ranging from part 2 No. to part 10 No. storeys (ABP Reg. Ref. ABP-311302-21). Permission was granted on 23<sup>rd</sup> December 2021.

This Grant of Permission was subsequently Judicially Reviewed and has now been remitted back to An Coimisiún Pleanála (ACP) at the time of writing this EIAR and awaits a decision. This applications new Reference No. is TA29S.322160.

We note that the Applicant has legal advice that section 37(5) of the 2000 Act does not apply where the matter pending before the Commission is a direct application, such as an SHD application, and is not considered the "subject of an appeal".

<sup>1</sup> Reduced from 671 No. units via condition.

### 1.2.2 Previous LRD Housing Development currently Subject to Judicial Review

Under An Coimisiún Pleanála Ref: LH29S.317921 (DCC Reg. Ref. 6026-23/S3), permission was granted on 19<sup>th</sup> December 2023 for 636 No. residential units and associated works. At the time of writing this Report, this application has been judicially reviewed by third parties and awaits adjudication.

### 1.2.3 Change of zoning from SHD Application to LRD Applications

The zoning of the site changed with the adoption of the *Dublin City Development Plan 2022-2028* ("Development Plan"), changing from Objective Z15 'Institutional and Community' in the *Dublin City Development Plan 2016 – 2022* (under which the SHD application was granted) to Objective Z12 'Institutional Land (Future Development Potential)' under the most recently adopted *Development Plan* (came into effect in December 2022), under which the last LRD application was granted.

This zoning change is in our opinion, a recognition of the facts that the lands are no longer institutional and have not been since prior to 2019 when the lands were sold to the Applicant.

## 1.3 Requirement to Prepare an EIAR

The Environmental Impact Assessment (EIA) requirements for certain developments derive from EU Directives. Directive 2011/92/EU as amended by Directive 2014/52/EU amended (the "EIA Directive") imposes requirements to assess the effects of certain projects on the environment. To assist with such assessments, the EIA Directive requires that an Environmental Impact Assessment Report ("EIAR") is prepared for certain projects. The EIAR was introduced by Directive 2014/52/EU and replaces the Environmental Impact Statement ("EIS") required under Directive 2011/92/EU.

The *European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018* have now transposed the 2014 Directive into Irish law.

Article 3 (1) of the amended Directive outlines that:

*"The environmental impact assessment shall identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on the following factors:*

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

The EIAR process is illustrated at Figure 1.2 below:

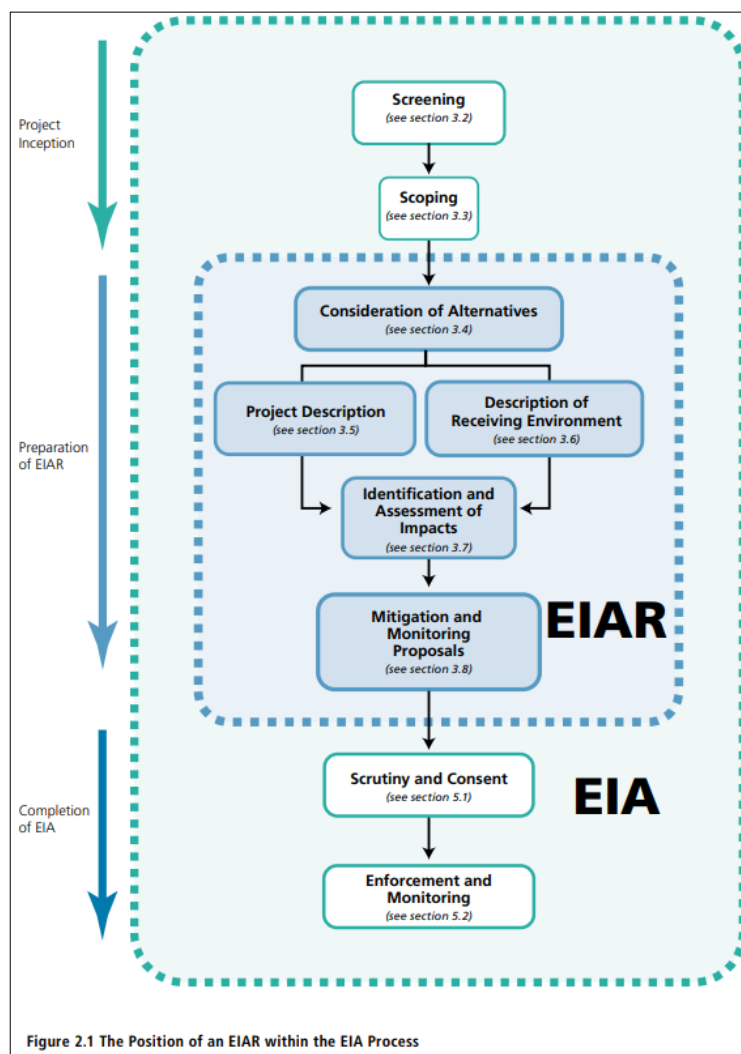


Figure 1.2: Diagram illustrating the Process of Carrying Out an EIA R

(Source: *EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022*)

As detailed in Figure 1.1 above, the following are the key stages of the EIA R process:

- Screening – Does an EIA R need to be prepared?
- Scoping – Relevant environmental aspects to be considered in the assessment
- Preparing the EIA R Document
- Completion of EIA R and any enforcement of mitigation measures or monitoring etc.

#### 1.4 Requirement to Prepare this EIA R

The preparation of an EIA R is required for the subject proposed development as the scheme falls within the remit of those listed in Schedule 5 (Part 2) of the *Planning and Development Regulations, 2001* (as amended), which sets out the relevant thresholds which require the carrying out of an EIA R. The subject development falls within the threshold of Category 10 (b)(i) as it comprises the “*construction of more than 500 dwelling units*”.

The EIAR has also been prepared having due regard to the Environmental Protection Agency's *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022* which sets out that:

*"A systematic approach, standard descriptive methods and the use of replicable assessment techniques and standardised effect descriptions must be adopted to ensure that all likely significant effects are adequately considered and clearly communicated."*

### 1.5 Purpose of this EIAR

This EIAR has been prepared on behalf of the Applicant, Sandford Living Limited, in relation to the subject development of 562 No. residential units, a creche, café/restaurant and community/cultural space. As noted above, the proposed development falls within the remit of Category 10(b)(i) Schedule 5 (Part 2) of the *Planning and Development Regulations, 2001 (as amended)*, which states that the carrying out of an EIAR is required when development comprises the "construction of more than 500 dwelling units".

The EIAR has been prepared in accordance with Article 5 (1) and Annex IV of Directive 2014/52/EU which stipulates that:

*"A description of the likely significant effect of the project on the environment resulting from, inter alia:*

- a) the construction and existence of the project, including, where relevant, demolition works;*
- b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;*
- c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;*
- d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);*
- e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;*
- f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;*
- g) the technologies and the substances uses.*

*The description of the likely significant effects on the [environmental] factors should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project."*

Furthermore, Annex III (3) of the amended Directive stipulates:

- a) "the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);*
- b) the nature of the impact;*

- c) *the transboundary nature of the impact;*  
d) *the intensity and complexity of the impact;*  
e) *the probability of the impact;*  
f) *the expected onset, duration, frequency and reversibility of the impact;*  
g) *the cumulation of the impact with the impact of other existing and/or approved projects;*  
h) *the possibility of effectively reducing the impact.”*

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This EIAR has been completed fully in accordance with Article 5(1) and Annex IV of Directive 2014/52/EU. This EIAR has been compiled by Thornton O'Connor Town Planning and incorporates all inputs from relevant experts as outlined in Section 1.7. The layout of the EIAR is discussed in the following section.

## 1.6 Format of this EIAR and EIAR Methodology

This EIAR comprises 3 No. volumes as follows:

- Volume 1: Non-Technical Summary
- Volume 2: Environmental Impact Assessment Report
- Volume 3: Appendices to the Environmental Impact Assessment Report

The preparation of this EIAR has comprised the compilation and presentation of a wide range of information from a variety of consultants. Each expert has compiled the relevant chapter (details of each expert outlined at the outset of every EIAR chapter) principally set out in the following format, where relevant:

1. Existing Receiving Environment (Baseline Scenario)
2. Physical Characteristics of the Proposed Development
3. List of Relevant Environmental Factors and any Likely Impacts of the Development
4. Proposed Mitigation Measures
5. Potential Cumulative Impacts
6. Monitoring Required
7. Avoidance, Remedial or Reinstatement
8. Interactions
9. Difficulties Encountered (if any)

In addition, an Examination of Alternatives is provided in Chapter 4 and a Non-Technical Summary of each chapter is provided in Volume 1 of this EIAR.

## 1.7 The Applicant

We confirm that our Client, Sandford Living Limited, owns the majority of the site (c. 4.26 Ha).

In addition, we note that a letter of consent has been received from Dublin City Council to carry out works on Milltown Road, Sandford Road and Eglinton Road (c. 0.48 Ha).

The total site area within the red line boundary will be c. 4.74 Ha.

## 1.8 The EIAR Team

This EIAR has been compiled by Thornton O'Connor Town Planning and comprises input from an experienced team of consultants. The various consultants have been provided in Table 1.1 below and their expertise will be included at the beginning of each relevant chapter. Each consultant is appropriately qualified and experienced in their respective fields in accordance with Directive 2014/52/EU.

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Chapter No.	Chapter Title	Consultant	Expert
Chapter 1	Introduction	Thornton O'Connor Town Planning (TOC)	Patricia Thornton
Chapter 2	Site Location and Context	TOC	Patricia Thornton
Chapter 3	Description of Development	TOC	Patricia Thornton
Chapter 4	Examination of Alternatives	TOC	Patricia Thornton
		O'Mahony Pike Architects (OMP)	Derek Murphy
		DBFL Consulting Engineers (DBFL)	Emma Daly
Chapter 5	Population and Human Health	TOC	Patricia Thornton
Chapter 6	Archaeological and Cultural Heritage	Archer Heritage Limited	Aidan O'Connell
Chapter 7	Architectural Heritage	Molloy and Associates	Maol íosa Molloy
			Shelley O'Donovan
Chapter 8	Biodiversity	DNV	Liam Gaffney
			Ciara Barry-Hannon
			Brian McCloskey
			Shane Connelly
			Caoimhin Rohu
			Caitlin Markey
			Abbie Doyle
			Kelly Macken
			Charith Rakesh Kumar
			Torchia Mc Quaid
Katie Connolly			
Chapter 9	Landscape and Visual Impact	Modelworks	Richard Butler
Chapter 10	Land, Soils and Geology	DBFL	Emma Daly
			Ross Griffin
Chapter 11	Water-Hydrology	DBFL	Emma Daly
		AWN Consulting	Marcello Allende
Chapter 12	Air Quality and Climate	AWN Consulting	Jovanna Arndt
			Tanmay Gojamgunde
Chapter 13	Noise and Vibration	AWN Consulting	Leo Williams
Chapter 14	Material Assets – Waste Management	AWN Consulting	Chonail Bradley
Chapter 15	Material Assets – Transportation	DBFL	Robert Kelly
			Helen Gendy
			Jane Murphy
Chapter 16	Material Assets – Site Services	DBFL	Emma Daly
Chapter 17	Microclimate - Wind	O'Connor Sutton Cronin Consulting Engineers	Ashish Nautiyal
Chapter 18	Risk Management	Enviroguide Consulting	Darragh Grant
			Janet O'Shea
			Louise Hewitt
Chapter 19	Interactions and Cumulative Impacts	TOC/All	Collated by Patricia Thornton
Chapter 20	Mitigation Measures and Monitoring	TOC/All	Collated by Patricia Thornton
Chapter 21	Difficulties Encountered	TOC/All	Collated by Patricia Thornton

Table 1.1: List of EIAR Consultants

## 1.9 Terminology

The Environmental Protection Agency's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022 sets out a table of terms that can be used to consistently describe the specific effects in the EIAR. **These Guidelines note that all categories of terms do not need to be used for every effect.** Table 3.4 of these Guidelines sets out the following Description of Effects:

<p><b>Quality of Effects</b></p> <p>It is important to inform the non-specialist reader whether an effect is positive, negative or neutral</p>	<p><b>Positive Effects</b></p> <p>A change which improves the quality of the environment (for example, by increasing species diversity, or improving the reproductive capacity of an ecosystem, or by removing nuisances or improving amenities).</p>
	<p><b>Neutral Effects</b></p> <p>No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.</p>
	<p><b>Negative/Adverse Effects</b></p> <p>A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem, or damaging health or property or by causing nuisance).</p>
<p><b>Describing the Significance of Effects</b></p> <p>'Significance' is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful (also see <i>Determining Significance</i>).</p>	<p><b>Imperceptible</b></p> <p>An effect capable of measurement but without significant consequences.</p>
	<p><b>Not Significant</b></p> <p>An effect which causes noticeable changes in the character of the environment but without significant consequences.</p>
	<p><b>Slight Effects</b></p> <p>An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.</p>
	<p><b>Moderate Effects</b></p> <p>An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.</p>
	<p><b>Significant Effects</b></p> <p>An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.</p>

	<p><b>Very Significant</b></p> <p>An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.</p>
	<p><b>Profound Effects</b></p> <p>An effect which obliterates sensitive characteristics.</p>
<p><b>Describing the Extent and Context of Effects</b></p> <p>Context can affect the perception of significance. It is important to establish if the effect is unique or, perhaps, commonly or increasingly experienced.</p>	<p><b>Extent</b></p> <p>Describe the size of the area, the number of sites, and the proportion of a population affected by an effect.</p>
	<p><b>Context</b></p> <p>Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions (is it the biggest, longest effect ever?)</p>
<p><b>Describing the Probability of Effects</b></p> <p>Descriptions of effects should establish how likely it is that the predicted effects will occur so that the CA can take a view of the balance of risk over advantage when making a decision.</p>	<p><b>Likely Effects</b></p> <p>The effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented.</p>
	<p><b>Unlikely Effects</b></p> <p>The effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented.</p>
<p><b>Describing the Duration and Frequency of Effects</b></p> <p>'Duration' is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful.</p>	<p><b>Momentary Effects</b></p> <p>Effects lasting from seconds to minutes</p>
	<p><b>Brief Effects</b></p> <p>Effects lasting less than a day</p>
	<p><b>Temporary Effects</b></p> <p>Effects lasting less than a year</p>
	<p><b>Short-term Effects</b></p> <p>Effects lasting one to seven years</p>

	<p><b>Medium-term Effects</b></p> <p>Effects lasting seven to fifteen years</p>
	<p><b>Long-term Effects</b></p> <p>Effects lasting fifteen to sixty years</p>
	<p><b>Permanent Effects</b></p> <p>Effects lasting over sixty years</p>
	<p><b>Reversible Effects</b></p> <p>Effects that can be undone, for example through remediation or restoration</p>
	<p><b>Frequency of Effects</b></p> <p>Describe how often the effect will occur (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)</p>
<b>Describing the Types of Effects</b>	<p><b>Indirect Effects (a.k.a. Secondary or Off-site Effects)</b></p> <p>Effects on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway</p>
	<p><b>Cumulative Effects</b></p> <p>The addition of many minor or insignificant effects, including effects of other projects, to create larger, more significant effects</p>
	<p><b>'Do-nothing Effects'</b></p> <p>The environment as it would be in the future should the subject project not be carried out</p>
	<p><b>'Worst case' Effects</b></p> <p>The effects arising from a project in the case where mitigation measures substantially fail.</p>
	<p><b>Indeterminable Effects</b></p> <p>When the full consequences of a change in the environment cannot be described.</p>
	<p><b>Irreversible Effects</b></p>

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	When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.
	<p><b>Residual Effects</b></p> <p>The degree of environmental change that will occur after the proposed mitigation measures have taken effect</p>
	<p><b>Synergistic Effects</b></p> <p>Where the resultant effect is of greater significance than the sum of its constituents, (e.g. combination of SO<sub>x</sub> and NO<sub>x</sub> to produce smog)</p>

**Table 1.2: Description of Effects**

(Source: *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022*)

Figure 3.5 of the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022* provides the following diagram, which shows how comparison of the character of the predicted impact to the sensitivity of the receiving environment can determine the significance of the impact.

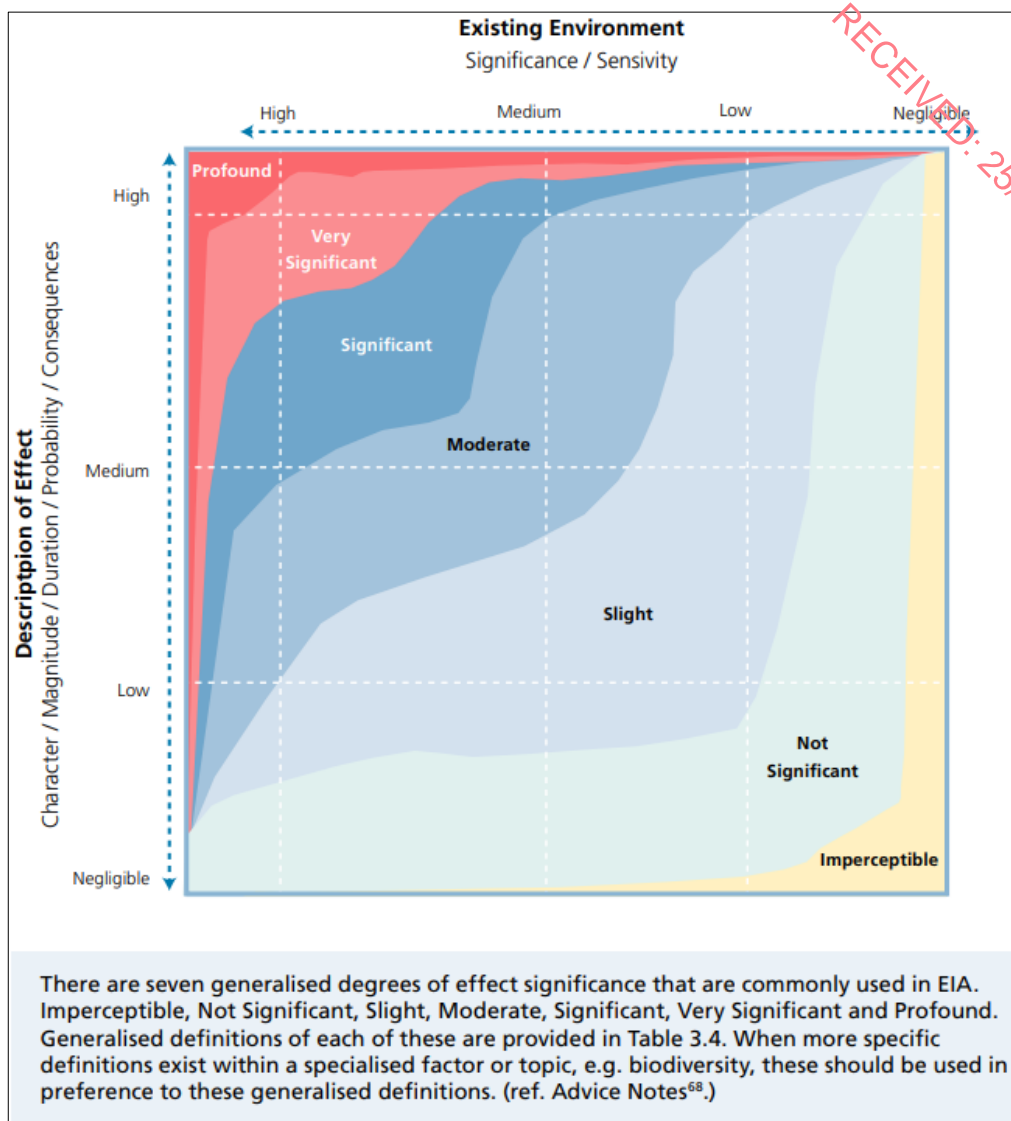


Figure 1.3: Chart Showing Typical Classifications of the Significance of Impacts

(Source: *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022*)

### 1.10 Quotations

The application is also accompanied by a Non-Technical Summary of the EIAR, which is laid out in a similar, but condensed format to the main EIAR. The structure, presentation, and the Non-Technical Summary of the EIAR, all facilitate the dissemination of the information contained in the EIAR. The core objective is to ensure that the public and local community are aware of the likely environmental impacts of the proposed development prior to the granting of permission.

However, it is important to acknowledge that the EIAR by its nature contains statements about the proposed development, some of which are positive and some less than positive. Selective quotation or quotations out of context can give a very misleading impression of the findings of the study. Therefore, the study team urge that quotations should, where

reasonably possible, be taken from the conclusions of specialists' sections or from the Non-Technical Summary and not selectively.

The EIA Regulations require that difficulties such as technical deficiencies, lack of information or knowledge encountered in compiling any specified information for the EIAR be described. Any difficulties encountered in the production of this EIAR are outlined in the relevant Chapters and summarised in Chapter 21.

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