4.0 EXAMINATION OF ALTERNATIVES

4.1 Introduction

This chapter of the EIAR sets out the reasons why the proposed layout was chosen and provides details of alternative layouts considered throughout the design process. In addition, this chapter discusses the do-nothing alternative, alternative locations, alternative processes and alternative mitigation measures associated with the proposed development. This is in accordance with Annex IV (2) of the amended EIA Directive (2014/52/EU), which notes that the following is required in relation to the consideration of alternatives in the preparation of an EIAR:

> *"A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment".*

Article 94, Schedule 6, paragraph 1(d) of the Planning and Development Regulations 2001, as amended requires the following information:

> *"(d) A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment".*

4.2 Qualifications and Experience

This chapter of the EIAR was prepared by Patricia Thornton (Thornton O'Connor Town Planning), Derek Murphy (O' Mahony Pike Architects) and Emma Daly (DBFL Consulting Engineers).

Patricia Thornton (BSc. Surv) (MRUP), 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.

Derek Murphy (BA Hons, Dip. Arch, BEAM Pro) (MRIAI, RIBA, HKIA Assoc), Associate Director of O' Mahony Pike Architects is a Practice member of the Royal Institute Architects Ireland and has c. 27 No. years post-qualification experience. Derek has experience in preparing and coordinating EIARs for a variety of projects and has also been involved in a wide range of developments including residential, hospitality, tourism, and large mixed-use commercial developments.

Emma Daly (Associate Civils DBFL Consulting Engineers) is a Chartered Professional Engineer (BEng MSc CEng MIEI) with over 10 No. years' experience in the design and construction of civil engineering projects. Projects have included works associated with the commercial, industrial, energy, residential and public infrastructure sectors.

4.3 Legislative Context and Guidelines

The preparation of this chapter has had regard to the following:

- *Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment (Directive 2011/92/EU as amended by 2014/52/EU) (European Union, 2017);*
- *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (Environmental Protection Agency (EPA), 2022); and*
- *Planning and Development Regulations, 2001 (as amended).*

Annex IV (2) of the amended EIA Directive (2014/52/EU) notes that the following is required in relation to the consideration of alternatives in the preparation of an EIAR:

> *'A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment.'*

4.2 Justification for the Proposed Development

4.2.1 Site Description and Zoning Objective

The proposed development principally comprises the construction of 636 No. residential units, a creche and community/cultural space. A fully comprehensive description of development is provided in Chapter 3 of this EIAR.

We note that the subject site is zoned Z12 *'Institutional Land (Future Development Potential)'* under the *Dublin City Development Plan 2022-2028* (which came into effect in December 2022), where the stated aim is *'to ensure existing environmental amenities are protected in the predominantly residential future use of these lands'.* Please see Figure 4.1 below with the subject application site annotated indicatively. The proposed site plan is also provided in Figure 4.2, noting that the road and infrastructure works proposed on Milltown Road, Sandford Road and Eglinton Road are also outlined in red.

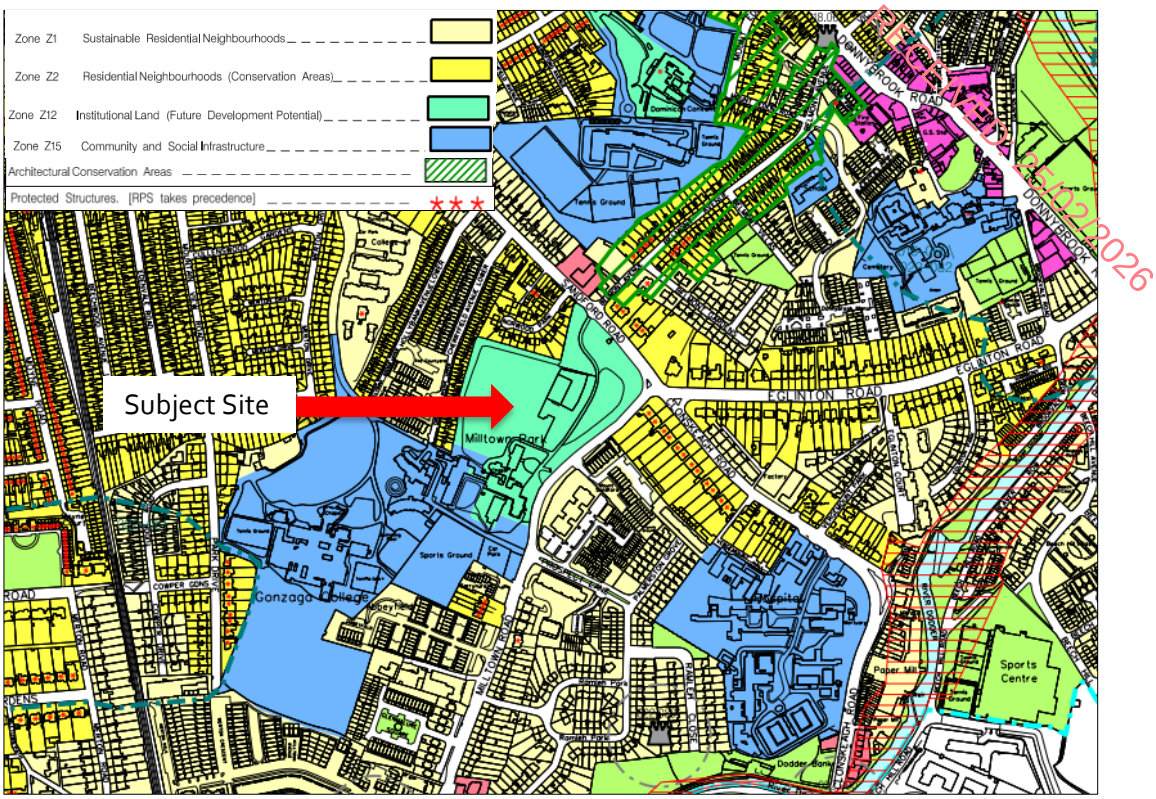

Figure 4.1: **Zoning Map Demonstrating the Z12 Zoning Pertaining to the Subject Site (Green Coloured Corner Site)**

(Source: ***Dublin City Council Development Plan 2022-2028*****, annotated by Thornton O'Connor Town Planning, 2023)**

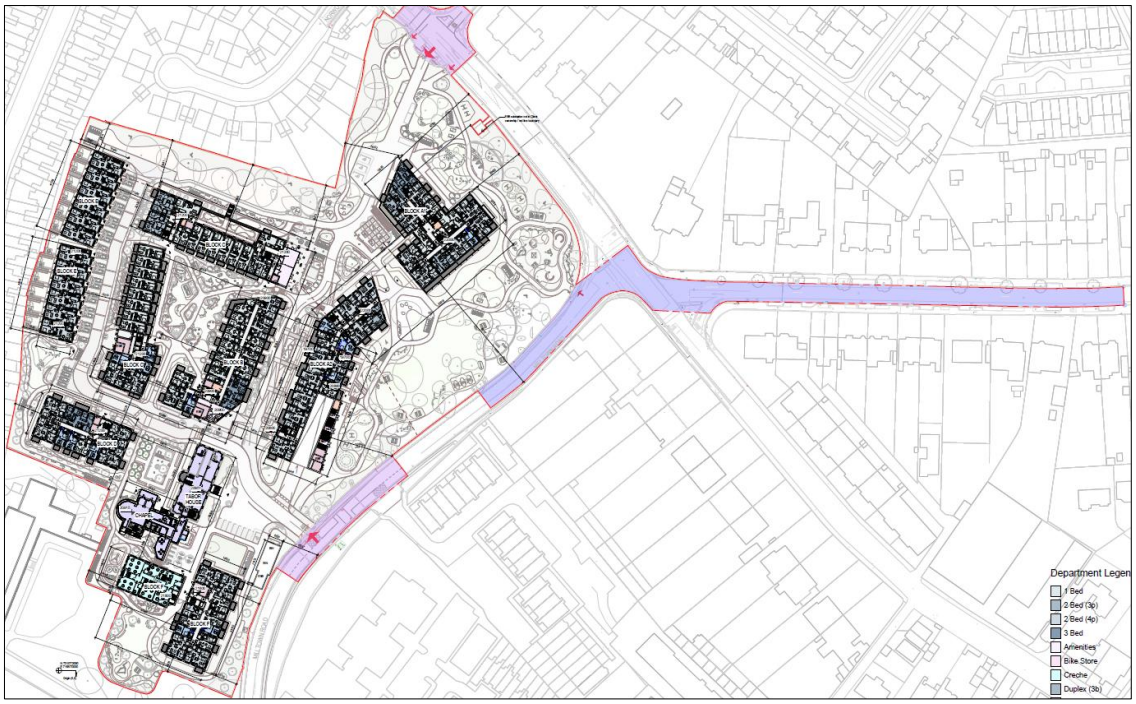

Figure 4.2: **Layout of the Proposed Scheme**

(Source: **O'Mahony Pike Architects, 2023)**

Under this zoning, residential, childcare facility, cultural/recreational building and uses and community facility are permissible uses.

Full details in relation to the Z12 zoning of the site are provided in Chapter 3.0 of this EIAR.

4.2.2 'Do Nothing' Alternative

In the event of a 'do nothing scenario' the site would continue to remain in its current underutilised state which would represent an inefficient use of scarce core urban land within an existing built-up area. The application site currently comprises the original Milltown Park House with subsequent extensions, which are vacant and no longer in use, in a highly accessible core urban location in Dublin in close proximity to high frequency public transport and employment locations. The existing plot ratio of the developable site (c. 4.26 Ha) is 0.12 and the proposed plot ratio of the development site is 1.28, which represents efficient densification of core urban lands.

In addition, we note that the site was historically (and is currently) closed up from the public as the site has always been in private use. Therefore, if the development did not proceed, the site would not be opened up to the public and the extensive public open space representing 34.8% of the site and permeable links incorporated into the scheme layout would not be provided for the wider community to utilise. The development will welcome the public through the site and will become a gathering place for the community for the first time. Therefore, if the development does not proceed this would be considered a negative impact.

In conclusion, the proposed development will provide much needed housing units in an existing residential area in addition to a creche and community/cultural space. If the development does not proceed, this would represent a lost opportunity to provide accessible public open space for the community as well as housing (i.e. 636 No. households would not be catered for) and cultural/community facilities for the wider neighbourhood.

4.3 Consideration of Alternatives

4.3.1 Alternative Locations

The overarching vision of the Applicant and the Design Team since the outset of the project has been to develop a high-quality scheme on appropriately zoned, serviced land.

When acquiring the site, the Applicant duly considered the zoning objective pertaining to the lands (at the time) which were zoned Objective Z15 *'Institutional and Community'* in the *Dublin City Development Plan 2016 – 2022*, where 25% public open space was required, beyond the standard 10% typically required for a residential development on lands within the administrative area of Dublin City Council ("DCC").

The zoning of the site has now changed to Objective Z12 '*Institutional Land (Future Development Potential)*' under the new *Dublin City Development Plan 2022-2028*. The provision of a Z12 zoning on the land, like the extant permission on the scheme, will continue to provide a minimum of 25% public open space on the site and will open the site up to the public for the first time. As is stands, the subject site is closed to the public and has never had any existing community or public open space function on the lands as the site was always in

private religious use, a use that is no longer required as clearly demonstrated in the application documents.

In addressing the particular characteristics of the site, namely a large volume of vacant institutional buildings, a key requirement early in the design process was to determine which buildings could be functionally retained and reused within the development. In addition, the requirement for 25% public open space has been considered in line with the former Z15 zoning objective pertaining to the lands (now Z12, which also requires 25% public open space). In this regard, it is important to note that the lands have always been walled and gated and in private use by the Jesuit Community and closed off from the public up until their sale, and will now be opened up for the first time to the public. The public have never enjoyed any right of access to these privately owned lands as confirmed by the Jesuits in their letter enclosed as part of Chapter 2.0.

The development layout was framed around these key design considerations and thus the development now proposed has utilised the remainder of the site to provide a range of residential units in addition to a creche and community/cultural space, as detailed extensively throughout this Chapter and application documentation.

Having regard to the core urban location of the site in proximity to high-frequency public transport, employment locations, services and facilities, the location of the lands within a built-up area, the sequential approach to development and the zoning objective of the subject site pertaining to the lands, alternative locations were not considered. Section 3.4.1 of the *EPA Guidelines 2022* state that *"in some instances some of the alternatives… will not be applicable - e.g. there may be no relevant 'alternative location'…"* The zoning of the site, the size of the site and the site's location close to the urban core, public transport and services and facilities has influenced the site's principal residential use along with the scale, height, and massing considered appropriate for the subject site.

4.3.2 Alternative Layouts

The scheme has been designed by OMP Architects and is presented in the Architectural Drawings, *Masterplan & Architectural Design Statement* and *Existing Buildings Feasibility Report* which should be read in conjunction with this Chapter of the EIAR.

The proposed scheme which is guided by current national, regional and local policy will appropriately assimilate into the surrounding context to provide a sustainable residential development in close proximity to public transport, services, facilities and employment locations.

In summary, the proposed layout of the scheme has fully considered the site's surrounding context by positioning the lower heights along more sensitive boundaries, to the highest forms which are positioned at the least sensitive locations such as fronting Milltown Road and Sandford Road, fronting the public park, and towards the centre and southern portions of the subject lands.

Having regard to large extent of the subject lands and the location of the lands in close proximity to public transport and a wide range of services and facilities, it is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in the interests of sustainable development. The

design has sought to respond to the locational characteristics of the site, proximate to a mix of low density houses and apartment blocks and yet provide a development that also responds to the site characteristics and opportunities presented by a very large underutilised plot that is positioned at a key prominent intersection between Milltown, Clonskeagh, Donnybrook and Ranelagh.

The subject layout evolved throughout the various stages of the previous SHD process and subsequent to a significant number of design team meetings and in response to the LRD Opinion Meeting with Dublin City Council. Please see below the earlier design iterations for the subject lands prepared by O' Mahony Pike Architects:

4.3.2.1 Various Design Iterations Proposed Throughout the Design Process

A key design consideration at the beginning of the process was to determine which buildings could be functionally retained and reused within the development. Once it was established which buildings could be functionally reused, the next stage of the masterplan was to ensure that adequate public open space could be provided in line with the Z15 zoning requirement in place at the time (now Z12, which also requires 25% public open space), opening up these lands for the first time to the public as the lands have always been walled and gated and in private use by the Jesuit Community and closed off from the public up until their sale.

The development layout was principally framed around these key design considerations. In addition to the large provision of open space, the residential development now proposed has utilised the remainder of the site to provide a range of residential unit sizes.

Figure 4.3 below demonstrates the existing buildings at the subject site which are all connected:

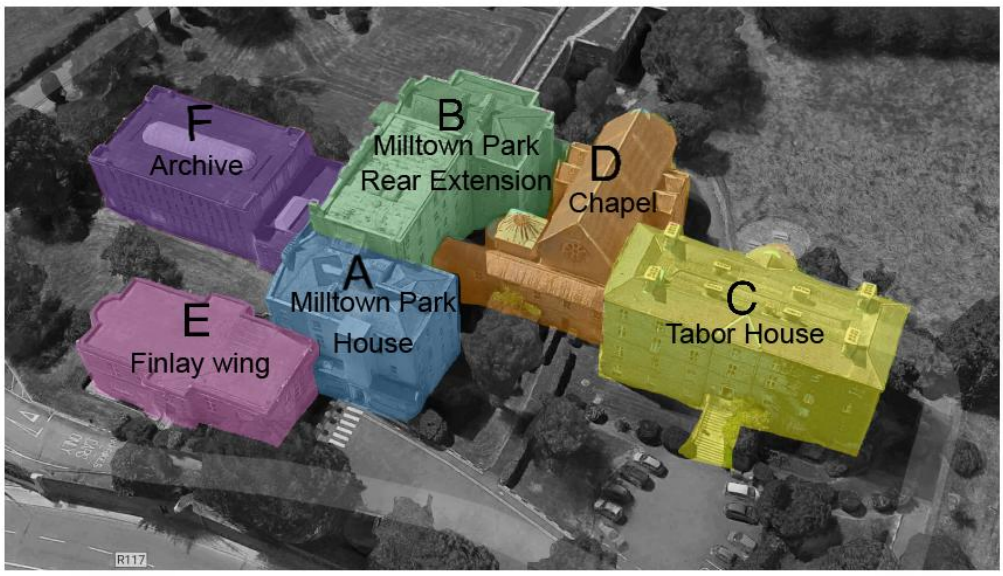

Figure 4.3: Outline of Building Range Which Identifies the Building Elements

(Source: Molloy and Associates Conservation Architects – Architectural Heritage EIAR Chapter 7)

Options A to D below demonstrates that the potential for the reuse of existing buildings was duly considered in the design process. The Finlay Wing was noted for removal early in the design process for reasons such as the following in summary:

- Both levels of the Finlay Wing are only connected by a long route through original Milltown Park House which confuses circulation;
- Due to the units not stacking vertically from floor to floor there would be an impact on the layouts as there would be 2 No. sets of services running in different locations through the units, which would reduce their usable area;
- Windows would require upgrading and external walls would need to be retrofitted with insulation which would further reduce the floor area;
- Lower-level floor to ceiling height of 2.6m is below minimum required of 2.7m at ground floor and would be reduced further with introduction of service zone and fire rating to ceiling soffit;
- Long term flooding at basement level has compromised the fabric; and
- Daylight on the lower level is impacted by the basement setting - 2m wide trench around most of the building.

O' Mahony Pike Architects comprehensively considered the opportunity to reuse the existing buildings within the development which is fully detailed in the *Existing Buildings Feasibility* Report which is included as an Appendix to the *Masterplan + Architectural Design Statement* enclosed separately prepared by OMP Architects. This EIAR Chapter has included principal details from this *Existing Buildings Feasibility Study* that were considered when determining which existing buildings could be appropriately and functionally reused within the development.

Option A – 600 No. units

Design Approach

The first design approach/response to the site consisted of the following key elements and strategy:

- The development layout comprised a mix of retention and new build elements.
- Requirement to provide 25% public open space on the lands in accordance with the Z15 zoning objective pertaining to the lands at that time.
- Retention of mature tree belt and woodland park as a key site asset forming the Eastern portion of the lands.
- Definition of the public open space and park edge by a predominantly 5 No. storey linear apartment blocks running north/south and anchoring the existing Sandford road entrance to the north.

- An assembly of apartment buildings of predominantly 5 No. storeys in height at the centre of the development forming a communal courtyard. In addition, a 10 No. storey mid-rise block was provided to add legibility and act as a focal point upon arrival.

- Provision of 3 No. storey housing to the north and western edges interfacing with existing residential development and a 4 No. storey apartment block to the south-west corner.

- Access and traffic strategy consisted of retention and re-use of the existing entrance off Sandford Road and the proposed provision of an alternative, new vehicular and pedestrian access off Milltown Road to the East. These access points were connected by way of a continuous internal 'loop' road around the perimeter of the site.

Figure 4.4: Option A

(Source: OMP Architects)

OMP Commentary

The following considerations required further analysis and appropriate solutions in the design iteration and development process:

1. The building forming the public park edge required further articulation and variation in massing. It also segregated the park at the northern edge and limited permeability and connectivity through the site from Milltown Road to Sandford Road.

2. The sense of arrival and placemaking at the centre of the scheme was weak. The configuration also lacked legibility and integration of pedestrian and cycle movement and a hierarchy of landscape open spaces through the development.

3. The intensification of development at the centre was abrupt and lacked character while creating a barrier to pedestrian and cycle movement though the site.

4. It was considered that the layout of the apartment blocks would provide an unnecessary number of single aspect, north facing units due to the block configuration and orientation.

5. The proposed housing element along the northern boundary was considered to needlessly impact on existing trees requiring removal.

6. The continuous outer 'loop' road made for a car dominated environment and promoted too much emphasis on car movement while acting as a potential short-cut for cars from Milltown Road to Sandford Road causing traffic impact concerns.

Option B – 586 No. units

Design Approach

The alternative Option B layout consisted of the following key elements and strategy:

- Retention of mature tree belt and woodland park as a key site asset forming the eastern portion of the lands. The housing element along the northern edge was removed in order to retain existing trees.

- Rearrangement of the central element and the provision of north/south linear blocks providing enhancements to daylight access to units and minimisation of north facing single aspect units.

- A key first principle was to provide a stronger focus on the north/south access connecting the Sandford Road entrance with the forecourt space to the front of Tabor House and the cluster of existing, historic buildings. This north/south access is annotated by the green arrow in the diagram.

- The removal of the internal perimeter road reduced traffic movement and allowed the design to shift to a more pedestrian orientated environment, whilst opening up more opportunities for permeability and connectivity through the development and the Z15 lands to the south.

- Opportunities for a series of 'pop-up' elements on the roofscape to the south end of the proposed blocks were explored to provide additional height while minimising potential impacts on existing residential areas.

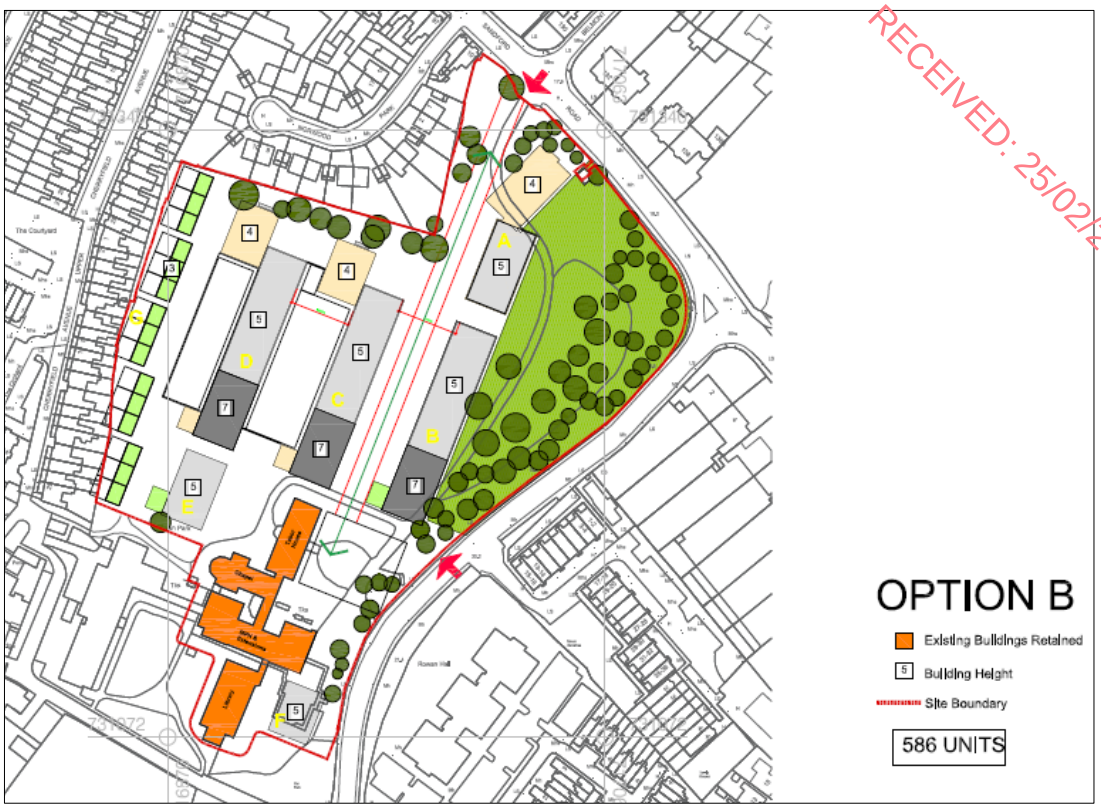

Figure 4.5: Option B

(Source: OMP Architects)

OMP Commentary

The following considerations required further analysis and appropriate solutions in the design iteration and development process:

1. The building forming the public park edge required further articulation and variation in massing. It also segregated the park at the northern edge and limited permeability and connectivity through the site from Milltown Road to Sandford Road.

2. The development of a hierarchy and sequence of internal and connecting public and communal open spaces was required in order to provide permeability and to define character areas within the development.

3. Further consideration of the interface with the northern edge onto Norwood Park was required in relation to secondary apartment block locations, separation distances and potential privacy issues.

Option C - 534 No. units

Design Approach

Alternative Option C consisted of the following key elements and strategy:

- Provision of a perimeter courtyard block at the centre with part basement/podium parking. Height gradation and massing of this element provided a modulation and variation in height and form while also enhancing good sunlight access to the space.

- Vehicular access provided to housing along the Western edge and terminating in a cul de sac thereby developing a "homezone" type environment along this street.

- The articulation and massing of the apartment blocks was better considered forming the edge to the woodland public open space with height variation introduced and expansion of woodland park to the north connecting with the Sandford Road entrance. In addition, an east/west connection is provided to improve permeability and ease of access to the park for all residents.

Figure 4.6: Option C

(Source: OMP Architects)

OMP Commentary

The following considerations required further analysis and appropriate solutions in the design iteration and development process:

1. The enriching of the layers of landscape spaces and social elements/facilities to inform a stronger sense of place.

2. Better articulation of the block addressing the Sandford Road entrance and increased separation distances to residential properties on Sandford Road.

3. Further consideration of the public park edge to the north near the Sandford Road entrance.

Option D - 540 No. units

Design Approach

Alternative Option D consisted of the following key elements and strategy:

- Further retention of mature tree belt and woodland park as a key site asset forming the eastern portion of the lands and provision of increased open space area.

- Reconfiguration of Block A along the woodland park edge to the east. The building form is cranked at an angle to address and respond to the junction between Eglinton Road, Sandford Road and Milltown Road. This also allows for the provision of a public square/pocket park/plaza contained by the building to its western edge and creates a positive sense of place upon arrival from Sandford Road.

- The north/south access road is developed as a pedestrian tree lined street or avenue connecting the arrival square to the north with the historic forecourt to the south. Car movement is therefore removed from this street enhancing pedestrian and cycle movement and permeability. The integration of social spaces around the public square to the north activates this space.

- A 13 No. storey mid-rise element is extruded from the linear A block to provide a 'visual marker' to respond to the wider context and prominent junction as well as acting as a marker to anchor the public square within the site and this intersection of pedestrian and cycle movement around the public park.

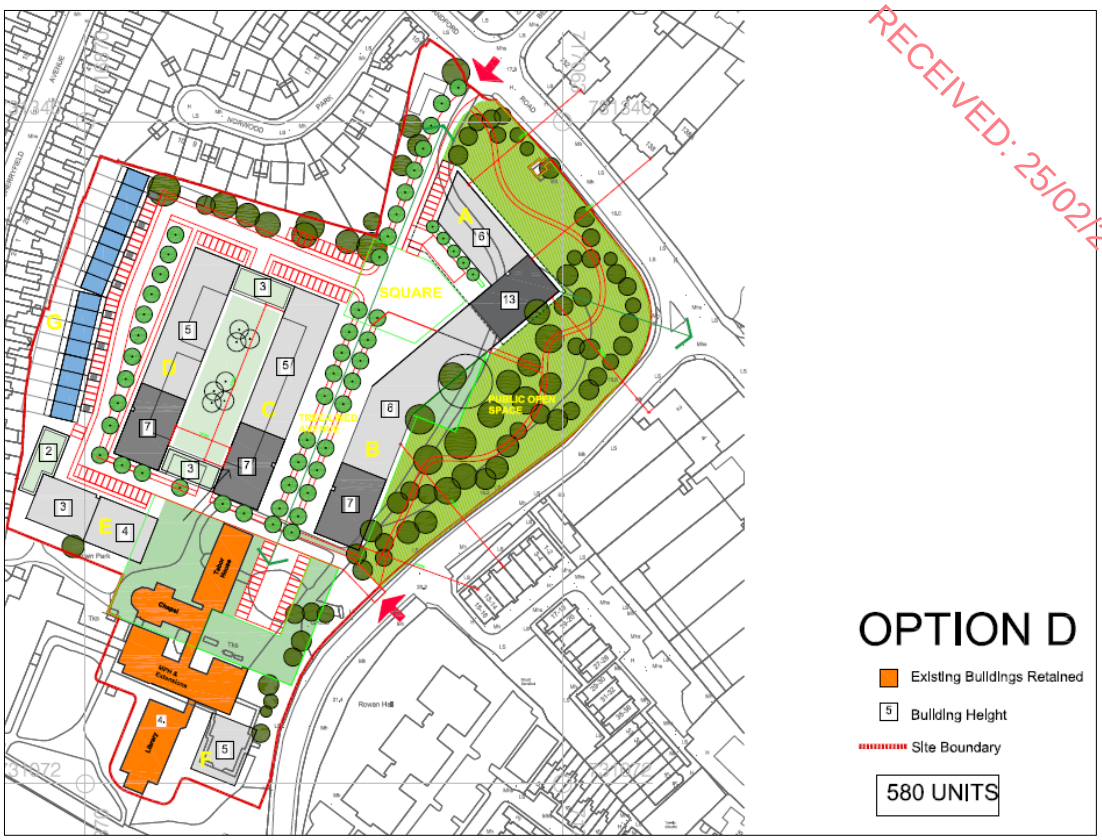

Figure 4.7: Option D

(Source: OMP Architects)

OMP Commentary

The following considerations required further analysis and appropriate solutions in the design iteration and development process:

1. Improved connectivity and further reduction of car movement within the site.

2. Further articulation of Block A to allow for the large 'Cedar' tree to be retained and become a key focal point at the triple storey archway connection between the public park and the public plaza.

3. More detailed consideration and assessment of the existing historic buildings and associated external 'in-between' spaces to be rationalised to improve the overall quality of the masterplan and proposed residential environment.

Summary of Options A – D

During the design iterations outlined in Options A-D, the potential re-use of all existing buildings was studied within the current interlinked grouping. As this building grouping is not protected and no associated dispensation are facilitated, OMP Architects took into account all of the statutory regulations which will have to be complied with including fire safety and DAC (Disability Access Certificate) requirements etc.

These studies raised challenges which became apparent during the detailed analysis of the existing buildings, and subsequently further options (Option E and F below) were developed with the functional reuse and refurbishment of the Chapel and Tabor House incorporated into the development.

In summary, Milltown Park House and Extensions were discounted from the scheme layout due to the extensive re-modelling of interior fabric that would be required to bring the building in line with current regulations and level access may not have been possible. Residential units and the possibility of providing a hotel were considered at the early design stage. The extensive remodelling would have provided c. 60 No. hotel rooms (not accounting for facilities/back of house) which was not considered viable. In relation to residential units, the issues with bringing the building in line with current regulations and providing level access, in addition to the limited scope to provide private amenity and fire concerns over the enclosed courtyard behind the chapel, all rendered the reuse of the building unviable and would essentially result in a new skin 'within an old shell' as so much of the existing fabric would be dramatically altered.

The Finlay Wing was discounted early in the design process as discussed previously, for example, due to confused circulation, floor to ceiling heights, daylight to the lower level and the units are not stacked so service shafts would impact internal layouts.

The Archive was considered for residential units in addition to shared living and hotel use. All three uses for the archive have major limitations due to:

- limited floor to ceiling heights;
- remote location within the site;
- narrow floor plate due to atrium;
- building fabric upgrade required;
- upgrades required by standards; and
- scale of potential development is not viable.

Major interior alterations would be required to bring this building in line with current regulations and with a total of 14 No. residential units with limited daylight and reduced heights in upper floors, this was not considered viable. Due to major interior alterations required to provide a total of 22 No. shared living units, this option is not viable for an operator due to the small scale. It is also noted that since the introduction of the *Apartment Guidelines, 2020*, this use no longer generally permitted. In relation to a proposed hotel use, major interior alterations would be required and the area for back of house is limited. There would be no proper drop off area for a hotel in this location and with only 18 No. rooms, the scale is not viable.

We also note that fire consultants for the development have advised that:

'Tabor House and the Chapel layout would generally be easier to adapt to community use…The other existing buildings have a number of issues in terms of fire strategy. Principally the layout is more difficult with a number of change of levels, which wouldn't be compliant for means of escape. Additionally the location of the buildings from fire tender accessibility would in our opinion require a significant redesign (including existing stair core locations), in order to develop a fire strategy.'

The adopted approach for reusing Tabor House and the Chapel intends to create a new setting in the landscape for Tabor House and the Chapel, which are now considered as a focal point within the overall development. The removal of the Archive aims to consolidate the green space in front of the Jesuit 'red brick' building creating a walled garden to the rear of the new Block F. A study on extending the site to the south (red shaded area on Figure 4.8 below) to connect to existing Jesuit entrance (outside of the application lands), but this was not pursued as land is not being sold by the Jesuits.

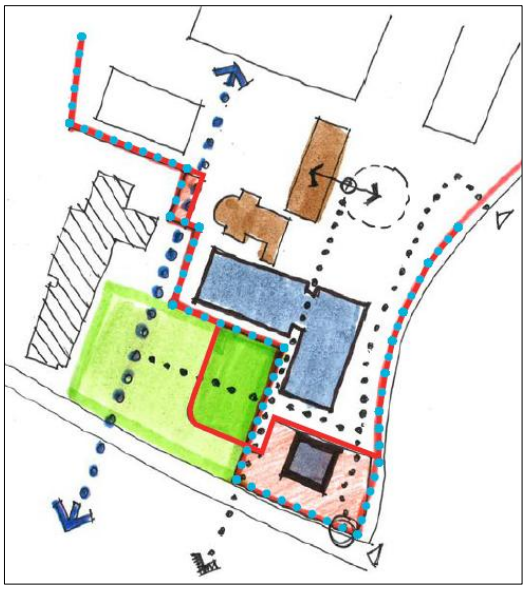

Figure 4.8: Study of Potential Extension of Application Lands to the South (However Not Available for Purchase)

(Source: OMP Architects)

The following are considered as benefits to improve the overall quality of the masterplan and proposed residential environment:

- The opportunity to showcase the 2 No. characterful buildings of Tabor House and the Chapel which are detachable from the grouping;
- The opportunity to reinforce both Tabor House and the Chapel as focal points placed in a new landscape setting;
- Architectural merit given clarity in form and fenestration and the overall quality of building fabric;
- The stripping away of buildings from around the Chapel and Tabor House will allow them to breathe and to be seen and appreciated by the public and future residents;
- The 2 No. buildings to be repurposed become a focal point within the new masterplan layout and are further activated by adding the newly proposed entrance

off Milltown Road which links these historic buildings back into the existing urban structure;

- Tidying up southern edge providing new form (Block F) to enclose the forecourt space and act as a backdrop to north/south avenue and vista from Sandford Road; and

- Tabor House and the Chapel will require upgrading but can be favourably adapted to residential and amenity / community uses.

Option E – 714 No. units

Design Strategy

The alternative Option E layout ultimately became the baseline masterplan for the previous SHD Application and consisted of the following key elements and strategy:

- The Milltown Road entrance would be the primary access point for cars with the Sandford Road entrance limited to taxi, delivery and emergency access vehicles only and the access road terminated at the edge of the public plaza.

- Further articulation of Block A ensures that the large 'Cedar' tree is retained and becomes a key focal point at the triple height archway connection between the public park and public plaza. The building shape is informed by this feature tree in terms of the cranked building form in plan as well as the introduction of a series of setback levels, which aim to provide generous outdoor terraces with views overlooking the park to the east and into the trees.

- The public open space and woodland park was extended to include the green space along the northern edge and a continuous pedestrian and cycle pathway formed a loop around the outer edges of the development connecting a variety of landscape character spaces and acting as a walking and exercise trail.

- Alternative routes through the pedestrian boulevard and communal courtyard linked the public plaza and woodland park further south to the green space to the rear of Tabor House, which also enhances the opportunity for future connectivity to the Z15 lands further south of the application site (if required in future).

- Tabor House and the Chapel have been retained to form a 'set piece' at the entrance off Milltown Road. A new apartment block forms the southern edge helping to provide containment to the forecourt and an ordered arrangement and sense of formality upon arrival. This composition ensures that Tabor House and the Chapel become the focal point and form the strong backdrop to the end of the tree lined avenue as you arrive from the north off Sandford Road.

- Opportunities were sought to try and ensure that this highly accessible site is suitably densified, and the land resource is best served regarding future proofing for a sustainable development. As such, apartment numbers increased from c. 580 No.

units to c. 700 No. units including the proposed conversion and re-use of Tabor House and the Chapel within the development.

Figure 4.9: Option E

(Source: OMP Architects)

As part of the design process, the proposed modification of the imposing boundary wall was comprehensively considered. In order to enhance legibility and permeability in the area, it is considered that views should be provided into the site which would visually open up the site for the surrounding area.

Figure 4.10 below demonstrates the proposed boundary wall treatment for the north-eastern and eastern boundaries fronting onto Sandford and Milltown Road proposed under Option E. At present, the wall is imposing and does not offer any glimpses into the application lands.

Option F will demonstrate the revised boundary treatment proposed as part of the SHD Planning Application, which has been carried forward to the subject LRD Planning Application. Figure 4.10 below demonstrates the Option E proposal (pink colour below highlights the boundary wall to be retained and the navy/blue show the portion of wall to be removed and replaced with an upstanding wall and railing).

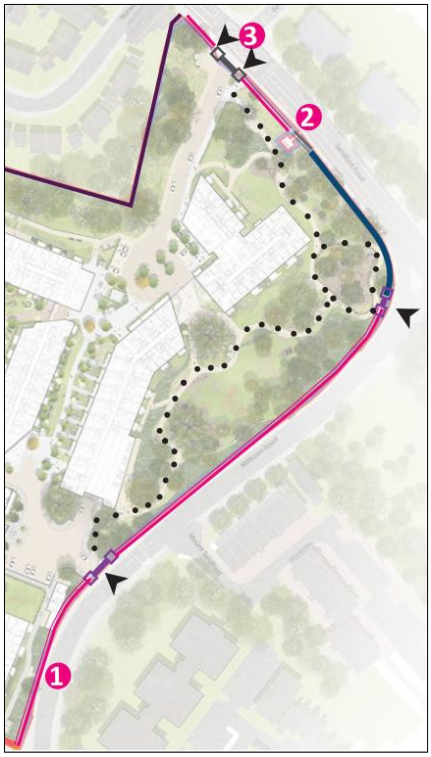

Figure 4.10: **Boundary Treatment Strategy Fronting Sandford Road and Milltown Road Under Option E**

(Source: **Cameo and Partners Design Studio, 2021)**

This was modified further to provide increased views into the subject site as discussed in Option F below.

Ultimately this overall Option E layout was moderately revised to form the design layout subject of the SHD Planning Application (see Option F below).

Option F – 671 No. units-The SHD Layout

The final design for the SHD Planning Application was informed by the examination of the various alternatives and is principally similar to Option E.

The principal changes incorporated into the scheme layout in Option F included the following:

- The 13 No. storey 'visual marker' building at the corner of the fronting the public park and plaza is reduced in height to 10 No. storeys. Upon further consideration, it was decided to reduce the 13 No. storey building, which is considered to represent a more subtle intervention, whilst also still creating a visual focal point within the development at a key arterial crossroads between Milltown, Clonskeagh, Donnybrook and Ranelagh that anchors the public open space.

  The height is in line with the existing mature tree belt forming the eastern and northern boundaries and provides a 'green veil' to the site perimeter. It was felt that the reduced height and prominence would be more appropriate in scale as a 'local landmark'.

- Block A1 'visual marker' building was reduced in footprint by providing a larger setback to the northern boundary in order to enhance connectivity and continuity of flow for the public park along the east and connecting to the northern public open space (known as the Northern Tree Glade). A winding path is provided along the eastern fringe off the Sandford Road entrance and links with the public park, providing a continuous loop around the development as a walking and exercise trail.

- Further refinement of the public plaza included eliminating all car parking and vehicular movements and ensuring it functions as a public space for pedestrian and cycle movement and use only. The Sandford Road entrance itself will be a secondary entrance to the site, principally for taxis, set down and deliveries with a small element of mobility impaired parking and thus will have very minimal traffic movements. Access to the public plaza will be restricted by bollards. The plaza space was fronted by ground level tenant facilities and a co-working hub to activate it as a meeting and social point for residents, and a strong connection is provided through the triple height undercroft of Block A to the public woodland park to the east. The total public open space provision on site in this layout 34.9% of the site and communal open space provision at surface level was 12.8% providing a total of 47.7% public/communal open space across the site. The landscaping treatment ensures high-quality and usable spaces are provided for the public and residents to utilise.

- A childcare facility has been added to the ground floor of Block F with outdoor play area. The creche has ease of access and setdown within the forecourt off the new Milltown Road entrance. The Milltown Road access will be the principal vehicular access to the site which will facilitate access to the basement car park, the forecourt adjacent to Tabor House and the duplex units and apartments along the western boundary (Block E). The majority of vehicular traffic from Milltown Road would filter directly into the basement car parking via a ramp proximate to the site entrance (within c. 20 No. metres of the site entrance) to ensure that the shared surface to the west of the site adjacent to the Block E duplexes and apartments will not be car dominated and will be a safe environment for all users. Some earlier versions such as

Option A, provided a continuous outer 'loop' road which would have resulted in a car dominated environment while acting as a potential short-cut for cars from Milltown Road to Sandford Road.

- Further enhancement of dual aspect provision to increase the quantum of dual aspect units to 51%, despite the requirement of 33% dual aspect units to be provided. This resulted in adjustments to the layouts and massing. These changes improved the overall residential quality of the scheme and in particular the changes to the courtyard blocks increased the width and area of the central communal courtyard space between Blocks B and C.

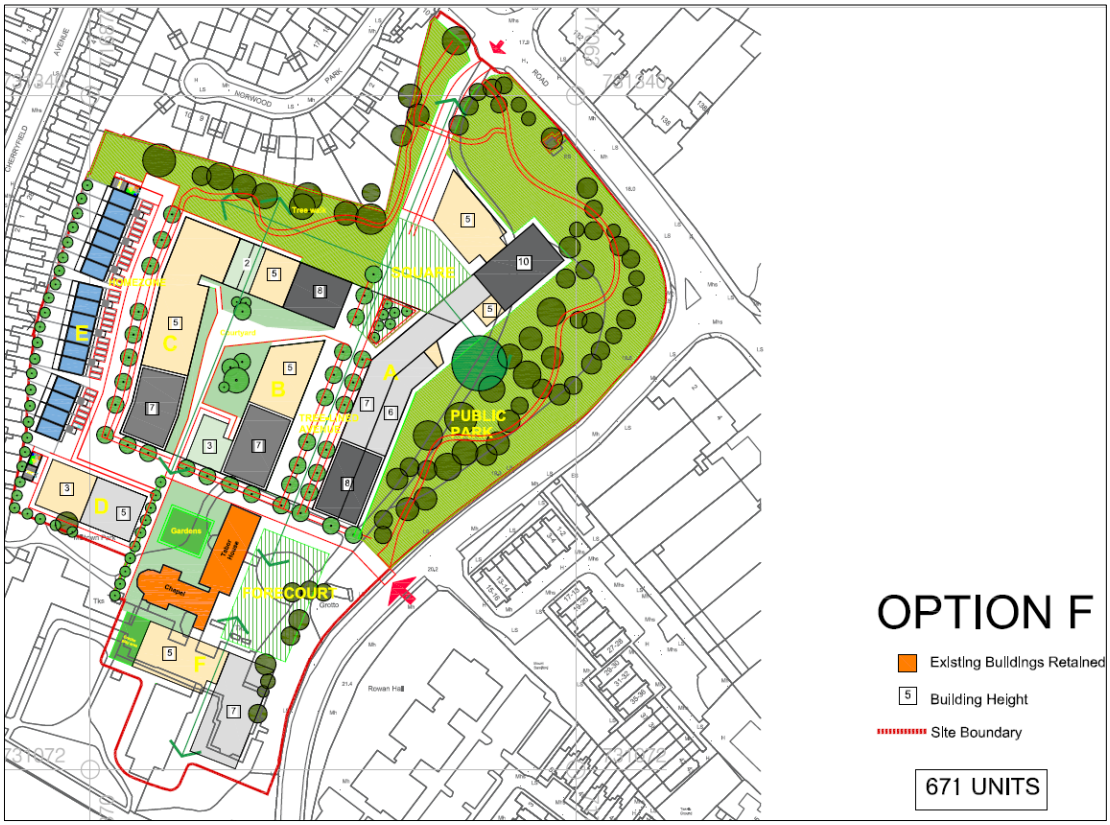

Figure 4.11: Option F

(Source: OMP Architects)

- It was decided to further enhance the boundary wall treatment fronting Sandford Road and Milltown Road to allow additional views into the site, which would ensure that the opportunity to enhance legibility and permeability for the area was maximised. The pink colour and purple colour below highlights the boundary wall to be retained and the green colour shows the portion of wall to be removed and replaced with an upstanding wall and railing.

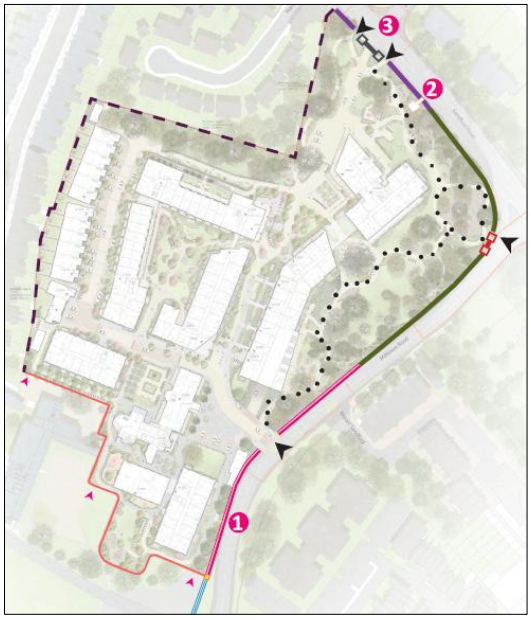

Figure 4.12: Boundary Treatment Strategy Fronting Sandford Road and Milltown Road Now Proposed

(Source: Cameo and Partners Design Studio, 2021)

Figure 4.13: Illustrations of the Proposed Boundary Treatment at the Junction of Sandford Road and Milltown Road and New Pedestrian Entrance

(Source: Cameo and Partners Design Studio, 2021)

- We note that the incorporation of permeable visual connections through the site and enhanced boundary treatments were a key consideration during the design process leading to greater public use of the space and represents a key planning gain for the wider community.

Option G – 636 No. units - LRD Layout

The final design (the chosen option for the subject LRD Planning Application) is informed by the examination of the various alternatives and is principally similar to Option F but also reflects the decision reached in the previous SHD planning application and amendments required as a result of the policies in the *Draft Dublin City Development Plan 2022-2028* and ultimately the adoption of the *Dublin City Development Plan 2022-2028* in December 2022.

The principal changes incorporated into the scheme layout in Option G include the following:

- The 4 No. units to the southern end of Block E have been removed as per Condition 2 (a) of the SHD application. In doing this, the space was regained into the communal open space for the project, allowing for additional landscape and SUDS feature to be incorporated. There was also a condition to remove the on-grade bin stores at the north and south of Block E. This provided the opportunity for the end units of Block E, to the north and to the south to be redesigned to address the open space to their formally blank gables.

- The overall mix was also adjusted from Option F to the current scheme to align with the new *Development Plan*. Build-to-Rent units have been removed from the development thus providing a 100% Build-to-Sell development of 636 No. units. This change did not impact the overall massing or height and was predominately an internal re-organisation of Block A2, reducing the number of studios & 1 No. bedroom units to a maximum of 50% of the total units.

- Tabor House and the Chapel are now proposed as community/cultural space in order to accord with the requirements of the new *Development Plan* (5% community/cultural space required). Tabor House was previously residential units and the Chapel was previously resident amenity space for the previously proposed Build-to-Rent elements of the scheme. Part of Block A1 is also proposed to be community/cultural space. The additional space requirement was fulfilled in Block A1, which has retained the original principle of activating the plaza and creating a focal point off the Sandford Road entrance.

  A further external space has also been provided in the formal garden to the rear of Tabor House and the Chapel, with a light open structure creating a unique gathering or performance space, dependent on the final use to be agreed with Dublin City Council.

- The number of units has reduced from 671 No. units proposed in the SHD Application (and 667 No. ultimately granted) to 636 No. units now proposed due to the following:

  - 4 No. units removed from Block E as a result of Condition 2(a)[1].
  - Change of unit mix to accord with standards for Build-to-Sell i.e. maximum 50% studios and 1 beds.
  - As a result of the change to Tabor House, 24 No. residential units have been omitted in order to provide the required cultural/community space. A new

[1] Condition 2 (a) required the omission of the standalone duplex apartment block that comprises 4 No. units at the southern section of Block E and their replacement with open space or for a use to be determined by a future planning application. The area comprises landscaping in this proposed LRD Application.

outdoor pavilion space ("Secret Garden") has also been added to the rear of Tabor House and the Chapel to serve the community.

- Balconies have been added to all studios whereas previously some new studios were not provided with balconies due to the flexibility allowed for Build-to-Rent units of the SHD.

Overall, there is no material change proposed to the hight, scale, massing of the proposal. The building heights proposed are the same as those proposed and granted in the SHD.

Externally, the visible changes are principally some additional balconies, the removal of part of Block E and amendments to elements of the landscaping to reflect the new policies in the *Development Plan*, namely SUDS policies and the provision of an improved area for biodiversity to the north of Blocks B & C as requested by the Parks Department at LRD Opinion Stage.

Having regard to the reasons set out above including the current planning policy in place, it is considered that the proposed development subject of this planning application is the optimum layout for the lands. The scheme as currently designed will appropriately densify these sustainable urban lands while also ensuring that appropriate transitions are provided from neighbouring properties. The height of the Block A1 was also reduced during the previous SHD Application stage, as it was considered that a more subtle intervention was needed at this junction while also still providing a focal point for the area. The design of the public plaza will provide an improved and safer environment for residents and the public due to the removal of cars from the area.

Option H – 562 No. units – LRD2 Layout

The final design (the chosen option for the subject LRD Planning Application) is informed by the examination of the various alternatives and is principally similar to Option G but also reflects the decision reached in the previous SHD & LRD1 planning application.

The principal changes incorporated into the scheme layout in Option H include the following:

- The total number of residential units has reduced from 636 No. to 562 No. (74 No. fewer units) which also reduced the gross floor area from 54,507 sq m to 50,196 sq m (above ground floor level).

- Block A1 reduced from a maximum height of 10 No. storeys to 8 No. storeys, as can be seen in the Verified views this brings the height comfortably within the treeline at the Sandford road.

- Block C has a reduced building height range of 4 No. to 7 No. storeys, with set back top level to the North. Block C now includes part double height at ground floor level which houses a gym and co-working mezzanine as part of the tenant amenities.

- Block E changed from 24 No. 3-storey duplexes and apartments to 6 No. 2-storey courtyard houses. The lower Block E has also been set-back further from the western boundary providing greater separation from the dwellings along Cherryfield Avenue. This has also allowed the retention of a large portion of the treeline located towards the western boundary.

- The proposal will introduce new uses which were not included in LRD 1, such as a café (c. 179 sq m) situated at ground floor of Block F.

- Due to a reduction in residential units and subsequent gross floor area, the 5% cultural/community space required under the *Development Plan* has reduced. As such, the cultural/community space proposed has reduced from 2,189 sq m to 1,946 sq m and will utilise Tabor House and the Chapel as well as provide external space to the rear of the buildings.

- No duplex units are proposed in LRD2.

- LRD 2 omits any works relating to the separation works and provision of a new boundary wall between the subject site and the Jesuit lands including the demolition of the red-brick link building. This work has been completed as it was subject to a separate Section 34 'Separation Works' application.

Summary of Design Strategy

The scheme design principally considered the reuse and refurbishment of existing buildings that could be functionally reused within the development and the required 25% public open space in accordance with the zoning objective. It is considered that the reuse of Tabor House and The Chapel will provide a characterful setting within the development.

We note that a key priority throughout the design process was to provide appropriate transitions from the 2/3 No. storey residential dwellings along Cherryfield Avenue Upper and Lower to the west and along Norwood Park to the north. In this regard, 2 No. storey courtyard-type houses have been provided within the western extent of the site, with a minimum separation distance of c. 30-metres provided from the adjacent dwellings in Cherryfield Avenue Upper and Lower.

In addition, large setbacks of between c. 32.5 metres to c. 50 metres have been provided between the Norwood Park dwellings and the part 4 No. to part 5 No. storey elements of Block C, with larger separation distances provided from the 7 No. storey pop-up element of Block C.

Please see Figures 4.14 & 4.15 for details.

Figure 4.14: Block Layout and Height of the Proposed Development

(Source: OMP Architects, 2025)

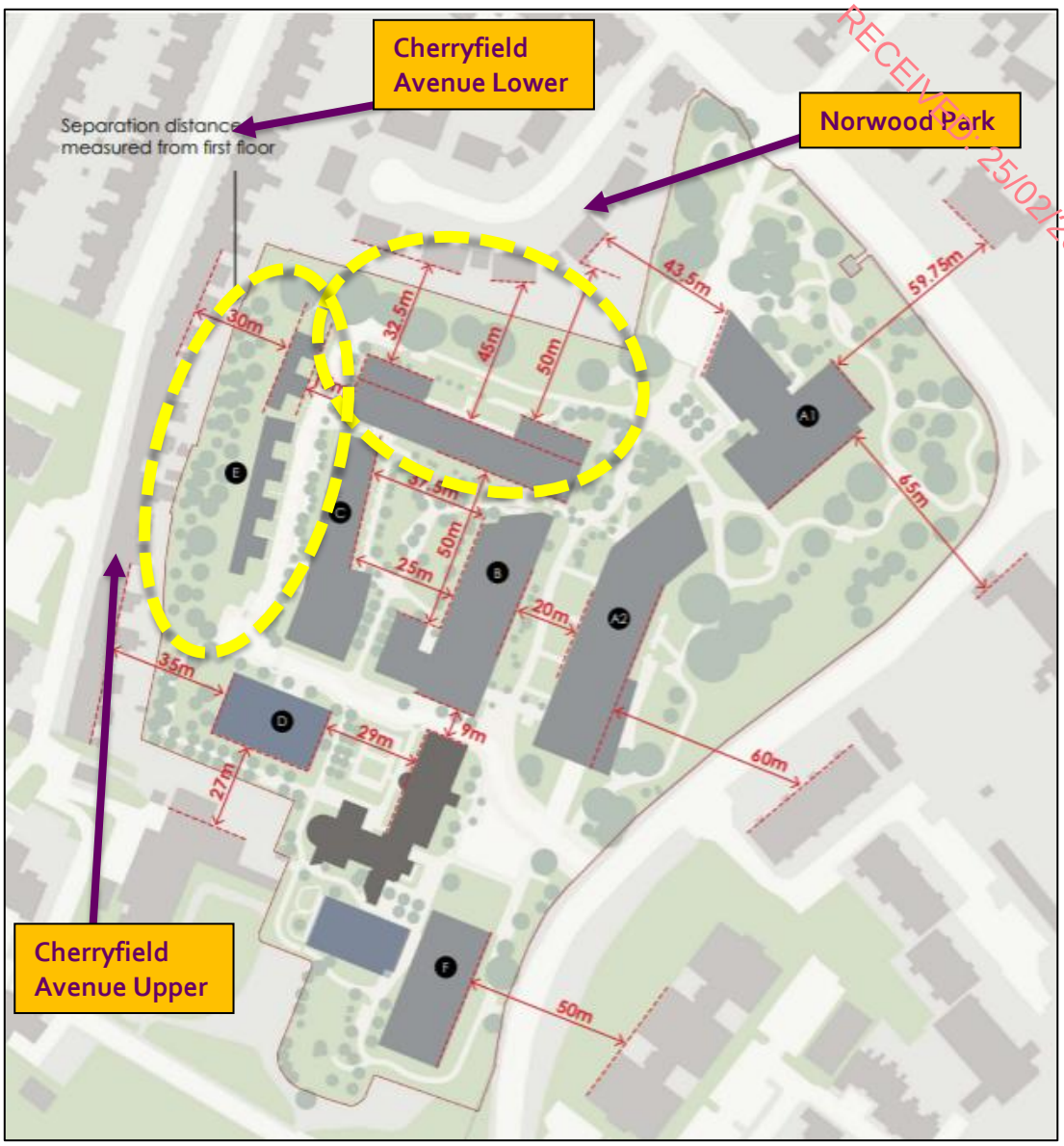

Figure 4.15: Separation Distances Proposed with Large Setbacks from Block C and 3 No. Storey Duplexes and Apartments in Block E Highlighted

(Source: OMP Architects, 2025)

Furthermore, Block D proposes heights of 3 to 5 No. storeys with the 3 No. storey element positioned adjacent to the neighbouring dwellings on Cherryfield Avenue Upper to provide an appropriate transition.

Block F to the south of the site ranges in height from 5 No. to 7 No. storeys and has been set back from the remaining Jesuit lands. This boundary between Block F and remaining Jesuits lands has recently been provided with a new 2.4-metre-high boundary wall as part of a previous application which sought to separate the Applicant's lands from the remaining Jesuit lands.

The scheme then transitions in height along the eastern boundary with Block A1 ranging in height from 5 No. to 8 No. storeys and Block A2 ranging in height from 6 to 8 No. storeys.

The 8 No. storey elements will act as focal points to improve legibility and wayfinding for the wider area and internally within the site.

The subject site has significant frontage onto a prominent junction which facilitates the unique opportunity to provide permeable connections through the site. These connections include through the public park and the pedestrian boulevard and in tandem with the provision of pedestrian gates and the opening up of portions of the boundary wall, this represents a significant planning gain for the area as the site is closed from the public (the lands have always been in private use by the Jesuit community). The provision of these connections will encourage permeability through the site benefiting the wider public, whilst also assisting with the integration of the proposed scheme into the surrounding area.

As noted above, it was determined that Tabor House and the Chapel were suitable to be functionally incorporated into the scheme design at Sandford Road. It is considered that the reuse and refurbishment of Tabor House and the Chapel presents the opportunity to showcase these buildings as 'object buildings' that can be functionally detached from the building grouping. The buildings will act as a focal point for the development especially entering the site from Milltown Road or walking through the pedestrian street from the northern end of the site with glimpses of Tabor House shown through the setbacks of Block B (see images in Figures 4.16 – 4.17 below).

Chapter 7 of the EIAR (Architectural Heritage) prepared by Molloy and Associates Conservation Architects states the following:

> *"The proposal to restore and adapt selective buildings, which are deemed to be both of heritage significance and suitable for purposeful adaptation, has been conceived to minimise the extent of loss across the site as a whole. The works proposed to the buildings selected for reuse, have been designed with the objective of preserving the character of the site and detailed to minimise unnecessary loss…The potential for positive impact is inherent in the rejuvenation of the site through the adaptation of existing building fabric of heritage interest, within their setting to an extent, and the provision of new buildings to secure a sustainable long-term use for the site…The retention of two buildings for purposeful re-use within the vast building range presents an inherently positive impact for the legibility of the original function of the site."*

Figure 4.16: CGI Towards Tabor House from the new Milltown Road Entrance

(Source: 3D Design Bureau, 2025)

Figure 4.17: CGI Towards Tabor House from the Pedestrian Boulevard

(Source: 3D Design Bureau, 2025)

In conclusion, after assessing the building range on site and determining which could be viably adapted and used, it was considered that the reuse of Tabor House and the Chapel within the development would provide a new and characterful setting within the landscape with the remainder of the site utilised to incorporate new structures to provide residential units as well as the extensive open spaces provided.

4.3.2.2 Surface Water Design and Attenuation Strategy

DBFL Consulting Engineers have provided the below details in relation to the surface water design and attenuation strategy for the subject development.

Initial Design Approach

During the SHD Application process, it was initially proposed to discharge surface water flow from the site at 2 No. locations (to the existing 600mm diameter combined sewer which is located adjacent to the site's northern-eastern boundary on Sandford Road and to the existing 375mm diameter combined sewer located adjacent to the site's south-eastern boundary on Milltown Road). The proposed outfall locations are identified in Figure 4.19 below.

During the SHD process, Irish Water advised that they were unwilling to accept discharge of surface water flows to an existing combined sewer. Attenuation requirements for this solution also impacted on existing trees located adjacent to the Sandford Road entrance (i.e., removal of screening trees at the northern site boundary).

The initial attenuation strategy for the development had all attenuation at ground level implemented by way of below ground storage (i.e. Stormtech attenuation systems). Given the items outlined above, an alternative surface water outfall and attenuation solution was developed.

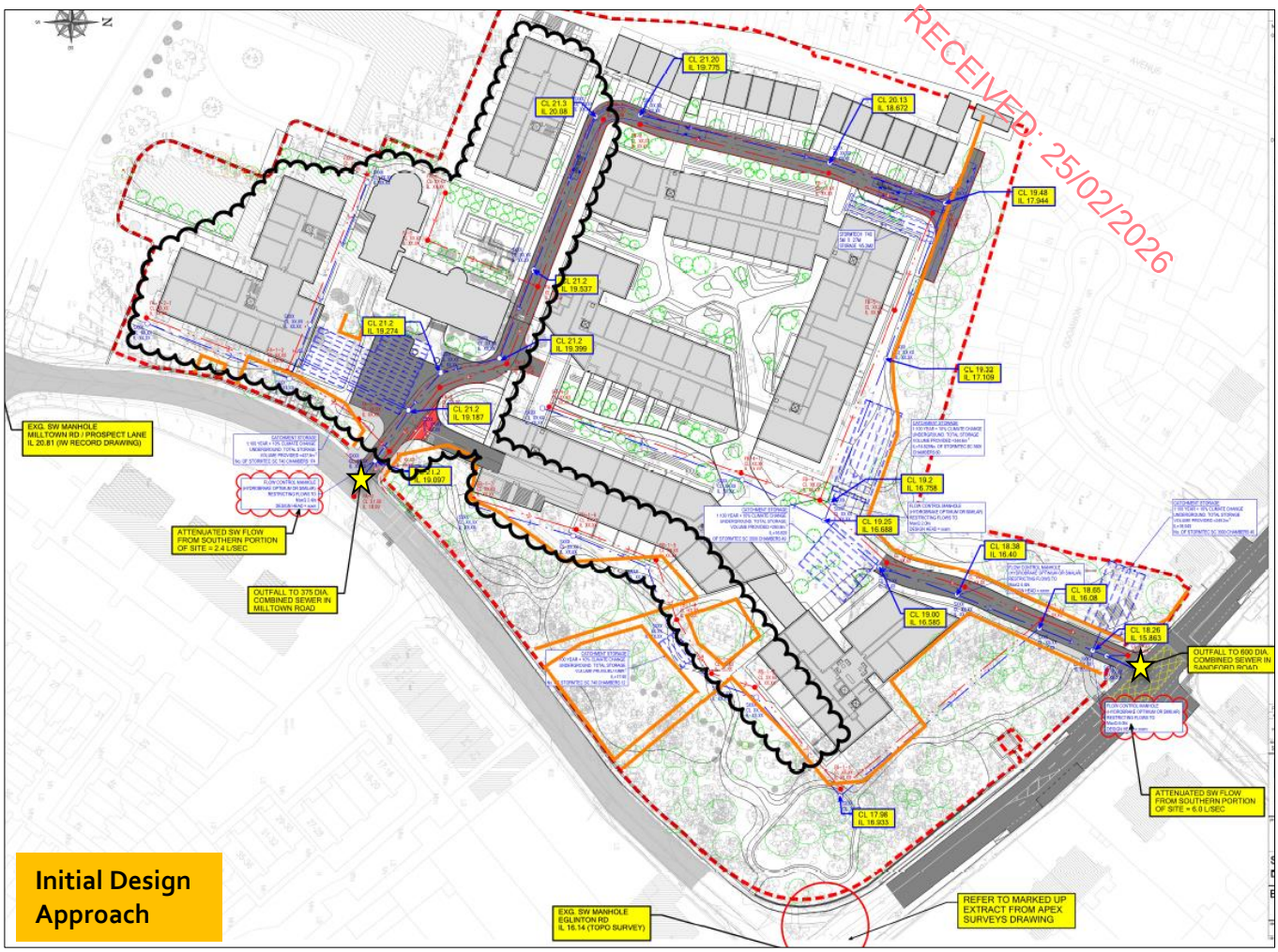

Figure 4.19: Original Surface Water Outfall Locations (Yellow Stars)

(Source: DBFL Consulting Engineers)

DBFL Commentary

As noted above, prior to the lodgement of the previous SHD Planning Application at the site, the initial surface water drainage strategy was not acceptable to Irish Water (discharge of surface water drainage to an existing combined sewer) and impacted on existing trees along the site's northern boundary. As such, an alternative surface water outfall point was investigated and all attenuation structures were pulled closer to the proposed buildings to avoid / minimize impact on existing trees located along the site boundary.

Option Lodged at SHD Application Stage

As advised by DBFL Consulting Engineers, it was proposed to discharge surface water flows from the proposed development to existing surface water drainage infrastructure on Eglinton Road. On this basis, Irish Water advised at the time that discharge of foul drainage flows to existing combined sewers adjacent to the site was feasible and thus this option has been chosen.

An existing 225 mm diameter surface water drain is located approximately 80 metres from the eastern corner of the site on Eglinton Road. It was proposed to discharge attenuated

flows from the site to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction where the public line increases to a 300 mm diameter pipe).

In order to achieve the required drainage invert levels on site, approximately 160 metres of the existing drainage network along Eglinton Road was proposed to be replaced with a 300mm pipe running at a flatter gradient. The total length of the surface water outfall from the point it crosses the site boundary at Milltown Road to the discharge point on Eglinton Road is approximately 300 metres.

Detailed topographic and GPR surveys were carried out along to the proposed outfall route (Milltown Road, through the junction of Milltown Road / Sandford Road and Eglinton Road) to assess feasibility with regard to the location of existing services.

Surface water discharge rates from the proposed surface water drainage network was to be controlled by a vortex flow control device (Hydrobrake or equivalent) and associated underground attenuation tanks (Stormtech Chambers or equivalent). Irish Water had no objection to this strategy in their submission to An Bord Pleanála in relation to the previous SHD Planning Application.

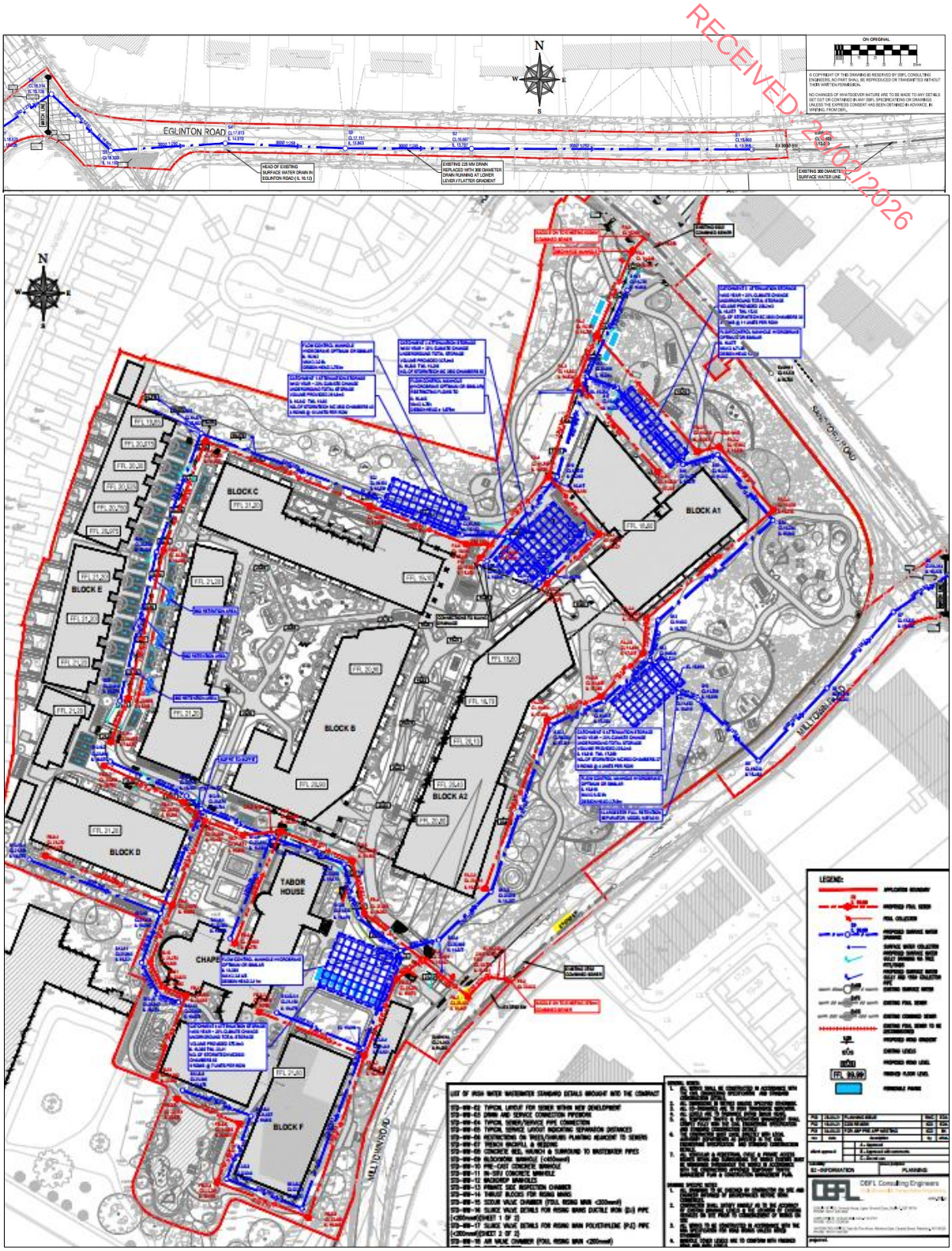

Figure 4.20: **Developed Surface Water and Attenuation Strategy Lodged at SHD Application Stage**

(Source: **DBFL Consulting Engineers, Dwg No. 190226-DBFL-CS-SP-DR-C-1001 Lodged as Part of the SHD)**

LRD Application Stage (Previous Application and Now Proposed)

For this and the previously proposed LRD Application stage, the surface water drainage strategy had to be updated in order to comply with the requirements of the newly adopted *Dublin City Development Plan 2022-2028*, specifically Appendix 13. Taking the granted SHD Planning Application strategy into account, the potential for attenuation basins was explored, in accordance with the requirements of the new *Development Plan*, which requires "*a softer engineered or nature based approach to be used to manage surface water*".

Surface water discharge rates from the proposed surface water drainage network will be controlled by a vortex flow control device (Hydrobrake or equivalent) and associated attenuation systems are provided (Stormtech Chambers /Attenuation Basin at ground level, Blue /Green roofs on apartment roofs and podium).

Above ground detention basins are introduced where possible (replacing below ground attenuation at 2 No. locations) and have been integrated with the landscape design.

In other locations, below ground attenuation areas are proposed e.g., in the plaza area adjacent to Tabor House / Chapel, due to the need to rebalance flows within sub-catchments or due to constraints such as tree protection zones. These have been reduced from 5 No. locations to 3 No. locations as part of the LRD Application.

The differences between the SHD Application and the current LRD Application are summarised below:

Previous SHD Application	**Current/Previous LRD Application**
5 No. below ground attenuations tanks located as follows: • In the public park • In the plaza adjacent to Block A1 • In the plaza adjacent to Tabor House/Chapel • To the north of Block C in the Woodland Glade • To the north of Block A1	3 No. below ground attenuation tanks located as follows: • In the public park • In the plaza adjacent to Block A1 • In the plaza adjacent to Tabor House/Chapel Below ground storage requirements have been reduced by greater use of green / blue roofs and podium (and activation of associated storage) and by use of attenuation basins (i.e. nature based suds).
No attenuation basins at ground level	2 No. above ground attenuation areas located as follows: • To the north of Block A1 • To the south of Block E
Green Roof/Blue Roof Systems Surface water calculations treated green roofs solely as a means of reducing runoff at the source, not as a form of attenuation	Green Roof/Blue Roof Systems Green and blue roof systems employed to provide attenuation.

Figure 4.21: Developed Surface Water and Attenuation Strategy for this LRD Planning Application

(Source: DBFL Consulting Engineers, Dwg No. 190226-DBFL-CS-SP-DR-C-1301)

This strategy satisfies the requirements of Irish Water (Confirmation of Feasibility letter and Statement of Design Acceptance have been issued by Irish Water), minimises impact on existing trees along the site boundary and satisfies the requirements of the *Development Plan*.

4.3.3 Alternative Processes

The proposed development includes the provision of 562 No. residential units, a creche, community/culture space, a café/restaurant and associated development. Therefore, as the development proposes in excess of 100 No. residential units, it is mandatory that the planning application is lodged as a Large-scale Residential Development Planning Application to Dublin City Council, under the *Planning and Development (Amendment) (Large-scale Residential Development) Act 2021.* Having regard to the nature of the proposed

development, alternative processes were considered but ultimately deemed irrelevant given the nature of the project.

4.4 Alternative Mitigation Measures

The mitigation measures outlined throughout the various EIAR chapters are considered appropriate for the proposed development. Therefore, no alternative mitigation measures were considered in the preparation of this chapter.

4.5 Cumulative Impacts

Each design iteration comprehensively considered any potential impacts on neighbouring developments, modulating the edges of the scheme to provide an appropriate transition to its direct context. This ensures that an appropriate design response has been provided to minimise the cumulative impact of the development with neighbouring developments. We note that a fully detailed *Community and Social Infrastructure Audit (incl. Schools and Childcare)* have been prepared by Thornton O'Connor Town Planning, which concludes:

> *"The baseline study undertaken identified a significant range of services and facilities which contribute to quality of life for local residents, comprising 162 No. social infrastructure facilities were identified as part of this Audit within a radius of 1 km of the subject site. The Study Area is particularly well served in terms of healthcare provision, faith infrastructure, and retailing amenities."*

Although the *Community and Social Infrastructure Audit (incl. Schools and Childcare)* concluded that there is *"a current shortage in childcare spaces"*, it further noted that *"it is expected that the granted pipeline of new childcare facilities, will address this shortfall into the future, alongside the childcare facility proposed as part of this scheme*". The proposed creche will benefit the future residents of the development but will also cater for the immediate existing residents of the area.

In addition, the final layout of the community/cultural spaces will ultimately be agreed through compliance with Dublin City Council, as identifying occupiers at this juncture is likely futile whilst the planning application goes through the planning and construction process.

A full list of proposed and pending applications was considered by the EIAR Team as set out in Chapter 3.0 (Section 3.5) and where relevant were included in the cumulative impacts assessment of the relevant chapter. In terms of this Examination of Alternatives Chapter, the surrounding developments are either at too great a distance or are too small to result in cumulative impacts with the subject proposed development. In addition, in most cases there are existing buildings located between the subject site and the list of developments outlined in Chapter 3. The most relevant planning application relates to the permitted modern archive building which has recently been granted permission by Dublin City Council for a (DCC Reg. Ref. 3116/22) within the retained Jesuit lands to the south of the subject site.

In addition, Chapter 9 (Landscape and Visual Impact Assessment) prepared by Modelworks notes the following details in relation to cumulative impacts:

> *'None of these permitted or proposed developments is (a) so close to the subject site,*

and/or (b) of such large scale that they could interact with the proposed development to result in townscape or visual impacts of greater significance than those predicted in Section 9.7 above. (There would be some cumulative townscape effect – see comment on the Eglinton Road SHD scheme and Jefferson House redevelopment below – but this would not change the significance or quality classifications in 9.7.1.2.)

The Eglinton Road SHD scheme (PL29S.307267), now built and operational, is the largest of the permitted developments in the site vicinity. This development is located at the opposite end of Eglinton Road from the site. It comprised the demolition of houses at Nos. 1, 3, 5, 7, 9 and 11 Eglinton Road and their replacement by an apartment building of up to 13 No. storeys. Across Eglinton Road from this development is Jefferson House, a 20th century office building. Planning permission (Reg. Ref. 3386/22) has been granted for the redevelopment of this site, and the replacement of the office building with a 12 No. storey apartment building. Together, these two developments will create a gateway (expressed in built form and height) to Donnybrook (and the city centre) on the Stillorgan Road, transforming the townscape character and views locally, affecting Eglinton Road. These are examples of the change taking place in the site vicinity.

The Eglinton Road and Jefferson House schemes could not be seen along with the proposed development in any one of view (being at opposite ends of Eglinton Road, which has a curved alignment) and some 600 m apart. However, they would jointly contribute to a shift in townscape character experienced by the residents and users of Eglinton Road.'

Therefore, it is clear that the potential for any cumulative impacts to occur have been comprehensively considered.

4.6 Conclusion

As a result of a detailed design process, which included the various design iterations outlined in this chapter and a significant number of design team meetings (many further to feedback from Dublin City Council), it is considered that the proposed layout is the optimum arrangement in terms of appropriately densifying the subject lands while also protecting the residential amenity of the neighbouring residential properties.

As noted previously, the proposed layout locates the highest forms at the least sensitive locations throughout the site (fronting Milltown Road and Sandford Road, fronting the large public open space area to the east of the site, and towards the centre and southern portions of the subject lands), at a distance from sensitive residential receptors.

The scheme also provides a substantial quantum of public open space (c. 15,023 sq m) representing c. 35.3% of the developable site area, which includes the provision of a large public park. As the site has been historically closed up to the public, the opening up of the site will welcome the public through the site for the first time and will become a gathering place for the community.

In addition to the public open space provision, the provision of permeable links (i.e. through the public park and through the pedestrian boulevard between Blocks A and B), new openings in the boundary wall (providing glimpses through the site) and the provision of new

pedestrian gates will encourage permeability through the site which will benefit the wider community, whilst also assisting with the integration of the proposed scheme into the surrounding area. It is thus considered that the proposed development represents a significant planning gain for the area especially as the site has been historically closed up from the public.

The proposed development will also provide a high-quality living environment for residents in addition to the provision of creche, café/restaurant and community/cultural space, which will benefit the future residents and the surrounding area. In conclusion, the proposed layout is well considered and includes an appropriate mix of residential dwelling sizes, a creche, café/restaurant and community/cultural space.

4.7 Difficulties Encountered

There were no difficulties encountered in compiling the information for this chapter.