

Chapter 2:

Project Description & Alternatives Examined

2.0 PROJECT DESCRIPTION & ALTERNATIVES EXAMINED

2.1 INTRODUCTION & TERMS OF REFERENCE

This section of the EIAR has been prepared by **John Spain Associates, Planning & Development Consultants**, in consultation with other design team members, and provides a description of the proposed development and also explains the evolution of the scheme design through the reasonable alternatives examined. This chapter of the EIAR was prepared by Paul Turley, BA, MRUP, Dip Environmental & Planning Law, MIPI, Executive Director with John Spain Associates.

The description of the proposed development is one of the two foundations upon which an EIAR is based (the other being the description of the existing environment described in this chapter and by each of the specialist consultants in the subsequent chapters). It is also a requirement of the EIA Directive (as amended) to present an outline of the main alternatives considered and a justification of the final proposed development.

A systematic approach in accordance with the Draft Guidelines on the Information to be Contained in EIARs (2017), Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018), and other EIA guidance documents was used to ensure all relevant aspects of the development are accurately and fully described. The objective is to provide a description of the proposed development in sufficient detail, which when taken together with the description of the existing environment provided, will allow an independent reader without acquired technical environmental knowledge, to understand the significant impacts likely to arise from the proposed development.

The description of the proposed development is set out in this chapter and the following chapters by each specialist consultant in terms of those environmental topics which will form the basis of the impact assessment process and the characteristics of the proposed development which could potentially affect population, human health, cultural heritage and archaeology, biodiversity, landscape, land and soil, water, air quality, climate, noise, vibration, wind and material assets and the interaction between the aforementioned factors. The EIA Directive also requires that the description of the site, design, size or scale of the development, considers all relevant phases of the existence of the project from its construction through to its existence and operation (and where applicable its restoration or decommissioning).

This EIAR document fully reflects the key environmental factors of the proposed development which were recognised from the scoping carried out by the design team and the level of detail required will vary considerably according to the sensitivity of the existing environment and the potential of the project for significant effects.

2.2 SITE LOCATION AND DESCRIPTION

2.2.1 Site Location and Description

The application site is located within the Frascati Shopping Centre, Frascati Road, Blackrock, Co. Dublin, which is currently at an advanced stage of construction as part of the permitted Rejuvenation Project which was the subject of an EIS in 2014. The proposal seeks to provide three levels of residential above the ground and first floor levels of the Rejuvenated Frascati Centre, including the replacement of the second floor level restaurant and storage space. The proposal includes lift and stair core connections to ground and basement floor level within the structure of the Rejuvenation Scheme. The car parking for the residential scheme will be accommodated within the permitted basement with an additional podium level of car parking proposed to cater for relocated car parking spaces.

The subject lands are zoned for 'District Centre' uses and is located within the core retail area of Blackrock village as defined by the Dun Laoghaire Rathdown County Development Plan 2016–2022. The Frascati Shopping Centre is situated on Frascati Road / N31 to the immediate west of Blackrock Village and approximately 8 kilometres south-east of Dublin City Centre. The N11 is located 1.5 kilometres to the west, the M50 is 3.5 kilometres further south-west. Blackrock lies to the adjacent to the coastline of Dublin Bay, a proposed Natural Heritage Area and Special Protection Area. Blackrock Park, located to the north of the district centre, is a valuable amenity for the area.

Blackrock Dart Station, which is situated centrally within Blackrock village, is situated approximately 300m to the east of the application site. Quality bus routes serve the Frascati Road and Rock Road and also the N11 corridor.

The application site which has an area of 0.625 hectares, within the larger Frascati Shopping Centre site, is bounded by the Frascati Road to the north-east, residential properties facing onto George's Avenue to the south-east; the rear of residential properties on Frascati Park to the south and south-west; and the rear of Lisalea apartments and associated access road and other residential properties on Mount Merrion Avenue to the north. The established residential properties along Frascati Park and Georges Avenue, to the south and west of the application site, comprise mainly of two storey terraced and semi- detached dwellings.

Figure 2.1: Site Context and Location



Source: Zoning Map Extract from DLRCC Development Plan

The subject site is primarily zoned objective DC- *“to protect, provide for and/or improve mixed-use district centre facilities”* in the Dun-Laoghaire Rathdown Development Plan 2016 - 2022.

The site is also located within an area subject to the Blackrock Local Area Plan, which was adopted by Dun Laoghaire Rathdown County Council in March 2015. In respect to the subject site, the Blackrock LAP supports a mix of uses in Frascati Shopping Centre including residential.

The subject site is served by a high quality public transport network including the DART and Dublin Bus' Rock Road Quality Bus Corridor (QBC). The site is accessed from Frascati Road which traverses the northeast boundary of the site. The Lisalea Apartment Complex lies on the northern boundary of the site and is accessed from Frascati Park. On the western boundary of the site lies Frascati Park, a residential road made up of predominately two storey terraced houses. On the southeast boundary lies George's Avenue, a residential road comprising of 2 storey terrace housing.

Plate 2.1- 2.2: Photos of the Subject Site (06/10/18)



On the opposite side of the Frascati Road the Friend's First former Enterprise House office site is undergoing redevelopment for a new five storey office building, as permitted under Reg. Ref.: D16A/0418 and ABP PL06D.247702. At the time of a site visit on the 6/10/18 the former office building had been demolished and the central core of the new development is constructed. An application for modifications to the permitted development is currently at appeal stage with ABP under Ref.: 301751-18 (DLRCC Reg. Ref.: D18A/0211).

Blackrock Shopping Centre is located opposite the centre also and is also undergoing rejuvenation. The centre was built in 1984 and contains 40 no. retail/commercial units including the SuperValu supermarket

which is the anchor tenant. The rejuvenation works permitted at Blackrock Shopping Centre under Reg. Ref.: D17A/0644 are currently being implemented on site.

Further detail on the planning history of the subject site and surrounding area is included in Appendix 2.1 and has informed the cumulative impact assessment undertaken as part of the preparation of this EIAR.

Figure 2.2: Existing Site Plan with Application Site in Red and Overall Landholding in Blue



Figure 2.3: Aerial Photograph of Blackrock



Source: Google Earth (Imagery date 24/6/18)

2.3 PROJECT OVERVIEW

Planning permission is being sought for a residential extension to the Rejuvenated Frascati Shopping Centre, which is at an advanced stage of construction at present (as illustrated in the photographs above), within the designed District Centre of Blackrock.

The proposal is for a residential development of 45 no. apartment units over 3 no. storeys, from second to fourth floor level, over the permitted ground and first floor levels of retail / restaurant floorspace and permitted lower ground floor car park. The proposal will be an extension of the Rejuvenation Scheme permitted under Reg. Ref.: D14A/0134 (which was the subject of an EIS), as amended by Reg. Ref.: D16A/0235 / ABP Ref.: PL 06D.246810, Reg. Ref.: D16A/0798, Reg. Ref.: D16A/0843 and Reg. Ref.: D17A/0599.

The proposed apartment mix consists of 3 no. 1 bed units, 36 no. 2 bed units and 6 no. 3 bed units. Balconies are provided for the residential apartments on the north eastern, north western, south eastern and south western elevations. Access to the residential units will be provided via a stair and lift core from lower ground and ground floor level. 51 no. car parking spaces within the lower ground floor car park will be allocated to the residential units. The development includes 54 no. bicycle parking spaces for the apartments, located at lower ground floor level and the proposed first floor level podium car park. The development also includes a bin store and plant area at lower ground floor level, two communal terrace areas at second floor level and roof level and plant enclosures at roof level. The proposal will result in the omission of the second floor level restaurant unit and storage floorspace permitted under the Rejuvenation Scheme.

The proposal includes a first floor level podium car park, over the permitted podium car park, located at the north west of the site, which will provide 81 no. car parking spaces. The total car parking provision for the scheme as amended by this permission will be 604 no. spaces, which comprises of 51 no. spaces for the proposed residential units and 553 no. spaces for the permitted retail and restaurant floorspace.

The application site area is 0.625 ha.

The proposal is an extension of the Rejuvenation of Frascati Shopping Centre, which is currently at an advanced stage of construction, and which related to an overall application site area of approximately 3.41 hectares, including the Frascati Road area included in the red line boundary of that application, the development site area, i.e. excluding Frascati Road, is 2.7 hectares. The development comprises primarily of the improvement of the current retail offer within the centre, along with the inclusion of additional retail services floorspace, the provision of additional café/restaurant floorspace and the reorganisation of the current car parking provision and access and circulation system.

The basement area, which will accommodate the car parking area for the residential units, has been constructed and the replacement car parking for the retail floorspace is proposed in an additional podium level as part of this residential extension application.

The Rejuvenation Project provided for partial realignment of the Priory Stream which is culverted under the site, and these works have been implemented as part of the development completed to date on site. The proposed residential extension has no impact on the culverted stream.

The proposed residential extension has been carefully designed to complement the rejuvenation project, which addressed the urban and architectural design issues associated with the shopping centre by creating a new building façade in closer proximity to Frascati Road with greater activity during the day and evening. The height and massing has been designed and position to provide an appropriate scale to Frascati Road whilst respecting the residential amenity of adjacent residential properties to the south, at Georges Avenue, and north at Lisalea.

The proposed residential extension will contribute to and promote the renewal and regeneration of the area by creating a strong urban edge along Frascati Road, which has already been significantly enhanced through the Rejuvenation Project which provides for a more permeable urban landscape and higher quality public realm with improved pedestrian connectivity with the core retail area of Blackrock village. The proposed residential extension will add to the mix of uses and vibrancy of the District Centre in accordance with the planning policy objectives for the site.

A more detailed description of the proposed development is included in Section 2.6 below.

2.4 STATUTORY PLANNING CONTEXT

2.4.1 National, Regional, County and Local Planning Context

The subject lands are subject to national, regional, sub-regional, county and local planning policy. The following outlines the key planning documents of relevance to the future development of the subject lands. This section will not address the detailed policies and objectives contained in the various plans which are relevant to the proposed residential extension to the Rejuvenation of Frascati Shopping Centre project which have been addressed in a separately bound Planning Statement and Third Party Appeal response prepared by John Spain Associates which accompanied the planning application.

National

- National Planning Framework – Project Ireland 2040
- Sustainable Urban Housing: Design Standards for New Apartments (2018)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);

Regional

- Regional Planning Guidelines for the Greater Dublin Area 2010-2022

County

- Dun Laoghaire Rathdown County Development Plan 2016-2022

Local

- Blackrock Local Area Plan 2015

The Dun Laoghaire Rathdown County Development Plan 2016-2022 sets out the planning policy context for future development in the County up to 2022 and beyond including land use and development objectives, settlement hierarchy, development control standards and policies and objectives for the protection of the built and natural environment of the County and is the most relevant document pertaining to the future development of the subject lands.

The subject site is primarily zoned DC (District Centre) in the Dun Laoghaire Rathdown County Development Plan 2016-2022 with the objective *‘to protect, provide for and / or improve mixed-use district centre facilities’*.

The site is also located within an area subject to the Blackrock Local Area Plan, which was adopted by Dun Laoghaire Rathdown County Council in March 2015. In respect to the subject site, the Blackrock LAP supports a mix of uses in Frascati Shopping Centre including residential.

Frascati Shopping Centre has an extensive planning history. Full details of the planning history for the application site are set out in the Planning Report accompanying the application. Appendix 2.1 of this chapter provides details of the relevant planning history of the subject site and adjacent lands of relevance to the EIAR and the cumulative impact assessment.

2.5 ALTERNATIVES EXAMINED

2.5.1 Introduction

The EIA Directive (2014/52/EU) requires that Environmental Impact Assessment Reports include *“A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”*

The presentation and consideration of various alternatives investigated by the project design team is an important requirement of the EIA process. This section of the EIAR document provides an outline of the main alternatives examined throughout the design and consultation process. This serves to indicate the main reasons for choosing the development proposed, taking into account and providing a comparison the environmental effects. For the purposes of the Regulations, alternatives may be described at three levels:

- Alternative Locations.
- Alternative Designs.
- Alternative Processes.

The DHPLG 2018 EIA Guidelines state:

“Reasonable alternatives may relate to matters such as project design, technology, location, size and scale. The type of alternatives will depend on the nature of the project proposed and the characteristics of the receiving environment. For example, some projects may be site specific so the consideration of alternative sites may not be relevant. It is generally sufficient for the developer to provide a broad description of each main alternative studied and the key environmental issues associated with each. A ‘mini- EIA’ is not required for each alternative studied.”

Pursuant to Section 3.4.1 of the Draft 2017 EPA Guidelines, the consideration of alternatives also needs to be cognisant of the fact that *“in some instances some of the alternatives described below will not be applicable – e.g. there may be no relevant ‘alternative location’...”*

The Draft 2017 EPA Guidelines are also instructive in stating:

“Analysis of high-level or sectoral strategic alternatives cannot reasonably be expected within a project level EIAR... It should be borne in mind that the amended Directive refers to ‘reasonable alternatives... which are relevant to the proposed project and its specific characteristics’”.

The proposed development is for a residential extension of the rejuvenated Frascati Centre, for which the construction stage is at an advanced at present. The site is zoned for District Centre uses and subject to a Local Area Plan both of which supports a mix of uses on the site, which the proposed residential use will assist in delivering. Having regard to the District Centre zoning and the policy support for mixed use development, particularly the delivery of residential use within district centres, alternative sites were not assessed for the proposed development.

A ‘do-nothing’ scenario would result in the permitted rejuvenation project being implemented in full, i.e. including the second floor restaurant and storage space, as assessed under the EIS submitted with the 2014 application.

The proposal seeks to provide three levels of residential use over two levels of retail and commercial use, including the omission of the second floor level. The proposed residential extension is therefore considered to represent a more appropriate, sustainable and efficient use of these strategically located District Centre zoned lands, particularly having regard to the opportunity to provide an enhanced mix of uses and improved urban edge to Frascati Road in close proximity to public transport nodes.

Alternative design and layouts for the subject lands were considered and discussed by the design team over an approximately a three month period up to the finalisation of the scheme. The proposals for the subject lands were the subject of discussions with the Planning Authority prior to the principles of the finalised scheme being agreed. The significant environmental issues and potential effects which informed this consideration related to ecology, traffic management, landscape and visual impact and potential impacts on the amenities of established properties and uses in the area. These considerations have informed the consideration of alternative layouts and heights of buildings, open space and road and access arrangements.

2.5.2 Description of Alternative Locations

As outlined above the site is zoned for ‘District Centre’ uses and is specifically identified in the Dun Laoghaire Rathdown County Development Plan 2016 – 2022 as part of Blackrock District Centre. The Development Plan and Blackrock LAP 2015-2022 both support and promote the delivery of a mix of uses on the subject site, including residential, which the proposed residential extension will deliver. In addition the LAP supports up to five storeys of development along the Frascati Road frontage, which the proposed development delivers, thus the consideration of alternative sites for the proposed residential units was not considered necessary.

2.5.3 Description of Alternative Designs

This section provides an overview of how the proposed development has evolved to date by way of consideration of alternative designs and how the final scheme has been reached.

The environmental issues which have most informed the design process to date relate to landscape and visual and daylight and sunlight impacts. These issues have informed the consideration of alternative designs and layouts up to the formalisation of the scheme submitted in this final application to the Board.

The following analyses different options for the site as the development proposals progressed over the last number of years. The key considerations and amendments to the design of the scheme, having regard to the key environmental issues, are also discussed.

Option 1- Refused Frascati Shopping Centre Redevelopment Application, Reg. Ref. D05A/0549 – An Bord Pleanála Ref. PL 06D.216840

This application was for comprehensive mixed use redevelopment of Frascati Shopping Centre. This proposal was superseded by the 2014 rejuvenation project. The application was refused planning permission by the Planning Authority and was subsequently withdrawn whilst subject to a first party appeal to An Bord Pleanála. This scheme was accompanied by an EIS. This application was considered by the design team as a useful starting point at the outset of the current design process for the residential extension to the Rejuvenated Frascati Centre, as it provided for five storeys of development at Frascati Road.

This application proposed the demolition of the majority of the shopping centre, excluding Debenhams and the adjacent ground level retail units. A significantly greater scale and quantum of retail and residential development was proposed in this application as illustrated in Figure 2.4 and 2.5 below.

Figure 2.4 - 2.5: Images of the Scheme Proposed Under Reg. Ref.: D05A/0549



Dun Laoghaire Rathdown issued a decision to refuse planning permission to Mecca International Limited on the 22nd of February 2006 for a mixed use retail (expansion), new residential, related public parking and ancillary uses and works including road works, all at the site of the established district shopping centre at Frascati.

The decision of the Council to refuse permission for the proposed development was based on the following consideration:

“The proposed development, due to the quantum of retail and residential uses, would intensify road usage in the vicinity of the site and would increase pedestrian movements crossing the N31 between the Frascati and the Blackrock Shopping Centres. In the absence of a segregated safe pedestrian/mobility impaired and disabled interlink bridge between these areas, it is considered that the development as currently proposed would endanger public safety by reason of a traffic hazard and would be contrary to the proper planning and sustainable development of the area.”

The above reason for refusal was based on the recommendations of the Transportation Department of Dun Laoghaire Rathdown County Council. The Planner's report prepared in respect of the proposal noted that the development was:

- *In the main consistent with the policies of the Development Plan;*
- *Generally compliant with Development Control Objectives;*
- *Consistent with the Retail Planning Guidelines; and*
- *Acceptable in terms of design considerations;*

The decision of the Council to refuse permission for the development was subject to a first party appeal to An Bord Pleanála (PL 06D.216840) on the 20th of March 2006. On the 30th of March 2007, An Bord Pleanála sought clarification on 3 no. items relating to proposals and agreements in respect of pedestrian link across the Blackrock By-Pass; full details of mitigation measures to address impact of proposed multi-storey car park on adjoining residential properties, and an increase in setbacks along the south eastern boundary.

The planning application was subsequently withdrawn by the applicant in accordance with Section 140 of the Planning and Development Act (as amended) on the 25th May 2007.

Thus, it is apparent from this application, as summarised above that no significant concerns were raised in respect to the proposed residential use and the heights proposed along the Frascati Road corridor.

Option 2- Permitted Frascati Shopping Centre Rejuvenation Scheme (Reg. Ref.: D14A/01340)

The subject proposal for a residential extension seeks to replace the permitted second floor restaurant and storage space permitted under the Rejuvenation Project and provide for three levels of residential floorspace from second to fourth floor level.

Figure 2.6: Permitted View of the Rejuvenation Project



It is considered that the permitted scheme does not result in the most sustainable use of this District Centre zoned site and the provision of 45 no. residential units from second to fourth floor level is an appropriate design response, which does not result in any adverse environmental impacts as demonstrated in this EIAR.

The main environmental impacts were addressed as part of the EIS and during the construction of the Rejuvenation Project which is now at an advanced stage of construction.

Preferred Option- Residential Extension Submitted for Approval

The subject scheme is described in detail in the following sections and also in the Planning Report and Design Statement which accompanies this application. It is considered that the finalised design as assessed in this EIAR takes account of the key environmental factors relevant to the proposed residential extension to the Rejuvenated Frascati Centre. The final scheme design has been informed by the various designs for the centre undertaken over a 15 year period and results in the optimal form of development in terms of delivering a mixed use District Centre and an improved urban environment, with a urban edge to Frascati Road.

2.5.4 Description of Alternative Processes

This is not considered relevant to this EIAR having regard to the nature of the proposed development.

2.6 CHARACTERISTICS OF THE PROJECT

This section provides a detailed description of the proposed Frascati Shopping Centre Rejuvenation Project which is the subject of this planning application.

The proposal is for a residential development of 45 no. apartment units over 3 no. storeys, from second to fourth floor level, over the permitted ground and first floor levels of retail / restaurant floorspace and permitted lower ground floor car park. The proposal will be an extension of the Rejuvenation Scheme permitted under Reg. Ref.: D14A/0134, as amended by Reg. Ref.: D16A/0235 / ABP Ref.: PL 06D.246810, Reg. Ref.: D16A/0798, Reg. Ref.: D16A/0843 and Reg. Ref.: D17A/0599.

The proposed apartment mix consists of 3 no. 1 bed units, 36 no. 2 bed units and 6 no. 3 bed units. Balconies are provided for the residential apartments on the north eastern, north western, south eastern and south western elevations. Access to the residential units will be provided via a stair and lift core from lower ground and ground floor level. 51 no. car parking spaces within the lower ground floor car park will be allocated to the residential units. The development includes 54 no. bicycle parking spaces for the apartments, located at lower ground floor level and the proposed first floor level podium car park. The development also includes a bin store and plant area at lower ground floor level, two communal terrace areas at second floor level and roof level and plant enclosures at roof level. The proposal will result in the omission of the second floor level restaurant unit and storage floorspace permitted under the Rejuvenation Scheme.

The proposal includes a first floor level podium car park, over the permitted podium car park, located at the north west of the site, which will provide 81 no. car parking spaces. The total car parking provision for the scheme as amended by this permission will be 604 no. spaces, which comprises of 51 no. spaces for the proposed residential units and 553 no. spaces for the permitted retail and restaurant floorspace.

Figure 2.7: Permitted and Proposed Views of the proposed development from the North East on Frascati Road



The table below sets out the retained and permitted floorspace in the Frascati Shopping Centre Rejuvenation project as per Reg. Ref.: D14A/0134. The total GFA of the Rejuvenation Project is 26,848 sq.m. This figure includes the lower ground floor / basement car park, i.e. the enclosed car parking area, but excludes the permitted podium level car park, as it is external to the Shopping Centre and therefore not included in the gross floor area of the scheme. This is supported by the definition of 'gross floor space' in the Planning and Development Regulations 2001-2018 which states the following: *"gross floor space" means the area ascertained by the internal measurement of the floor space on each floor of a building (including internal walls and partitions), disregarding any floor space provided for the parking of vehicles by persons occupying or using the building or buildings where such floor space is incidental to the primary purpose of the building;*

This GFA of 26,848 sq.m includes 791 sq.m of restaurant and storage floorspace at second floor level, which will be replaced by the proposed residential units at second floor level as part of the residential extension project.

Rejuvenation of Frascati Shopping Centre (D14A/0134)	
Retained / Replacement Gross Retail Floorspace	9,413
GFA of Lettable Retail, Retail Services and Restaurant / Café Floorspace	16,361
GFA of Rejuvenation Project (including basement but excluding podium level car park)	26,848
Proposed Floorspace	
Proposed Residential Floorspace (2nd-5th floor incl. Plant)	5,086.7
Proposed Residential Floorspace within Permitted Shopping Centre (Stairs/Lift Cores)	270.3
Total (basement car park already permitted)	5,357

**External podium car park excluded from GFA as per the definition of 'Gross Floor Space'*

Car Parking

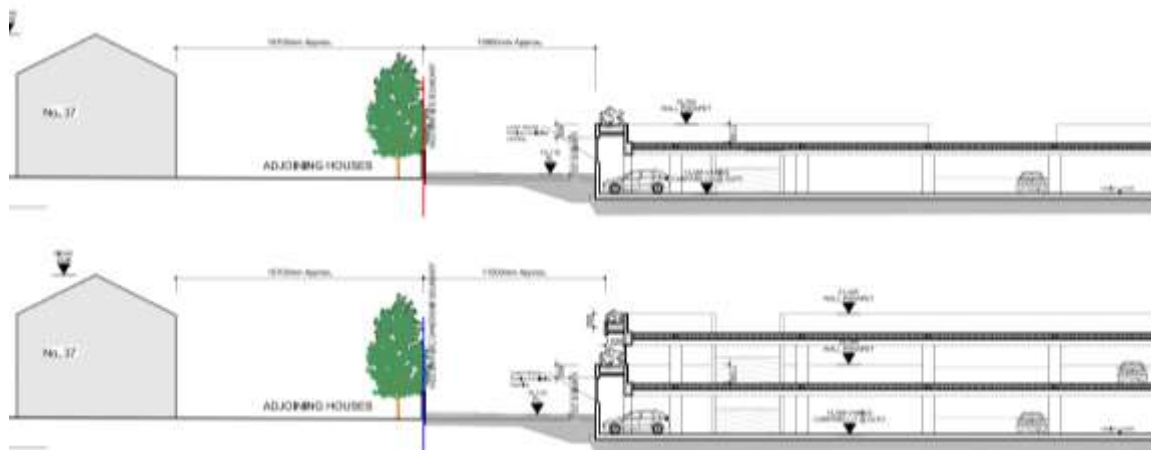
The total car parking provision for the scheme as amended by this permission will be 604 no. spaces, which comprises of 51 no. spaces for the proposed residential units and 553 no. spaces for the permitted retail and restaurant floorspace.

An additional first floor level podium car park to provide 81 no. spaces is proposed, with associated amendments to the access / circulation and parking provision within the existing podium level. This allows 51 no. spaces in the permitted lower ground floor level to be reallocated to the residential units, with associated amendments arising from the provision of residential units within the scheme. The allocation of car parking spaces, bin storage and cycle parking at lower ground floor level is considered appropriate as it ensures they are readily accessible to the residents and allows for a coordinated approach to management and servicing of the residential units.

The car parking allocated for the residential units complies with the requirement of 1 space per apartment unit, with 2 no. spaces being provided for each of the 3 bed units. The proposed car parking allocation for the residential units is considered to be acceptable given the suburban context, proximity to the DART and other public transport facilities in the area.

The design of the proposed additional level of car parking is well set back from the boundary by approximately 11m and does not result in any visual impacts or daylight/sunlight impact on surrounding neighbouring properties as indicated in Figure 2.8 below.

Figure 2.8: Permitted and Proposed Section Podium Level of Car Parking



The

Transport Statement prepared by ILTP, which accompanies this application, states that the proposed development of 45 no. residential units to the permitted Frascati Shopping Centre will have little or no material impact on the existing background traffic on Frascati Road and a full Traffic Impact Assessment is unnecessary based on the TII guidelines.

Management

In respect to car park management and servicing, we refer the Board to the Transport Statement prepared by ILTP which accompanies this application. In summary, the car park of the Frascati Shopping Centre will be controlled by a barrier at each of the 2 no. access points. Customers of the shopping centre will require a ticket to gain access, whilst it is proposed that residents will be allocated fobs to access the residential parking spaces.

As indicated on the Proposed Lower Ground Floor Plan the designated car parking spaces for the proposed residential development will be clearly marked as being designated for residential use, and this will be enforced by the management company.

Architecture & Design

The proposed residential development is designed to complement and be incorporated into the Rejuvenation of the Shopping Centre and configured so as to present as a well-proportioned façade to give consideration to the residential amenities adjacent to the site.

It is considered that the scale and design proposed for the residential development is acceptable at this site given the strategic location of the site in proximity to public transport facilities and the high amenity overlooking Dublin Bay. The proposed development contributes to providing a diverse mix of uses and further enhances the Rejuvenation of the Frascati Shopping Centre, which is currently under construction.

We refer the Board to the Architectural Design Statement prepared by NMA Architects which accompanies this application. The Design Report explains how the proposed development has regard to the surrounding urban context and a detailed description of the development approach for the proposed development which has informed the proposal submitted for planning approval. The design strategy for the proposed development is a response to the distinctive characteristics of the site, the prescribed land use zoning and the surrounding context.

The scale and massing of the proposed development has been carefully considered having regard to the nature of the surrounding development. The proposed height of the development is designed in accordance with the Development Plan standards and Blackrock LAP (5 storeys) and gives careful consideration to the neighbouring residential properties on Georges Avenue with appropriate setbacks.

Residential Amenity

The proposed apartments facing onto the rear of properties on George's Avenue (Frascati Park) have been designed to address the potential impact of the proposed scheme on the residential amenity of existing residents. The apartments proposed in this area are provided in a stepped back building mass and there is a c. 32 metre separation distance between the proposed apartments at Frascati Shopping Centre and the existing houses which front onto George's Avenue, as indicated in Figure 2.9 below.

The proposed separation distance is greater than the minimum 22m separation distance, as referenced in Section 8.2.3.3 of the DLR County Development Plan, which states the following:

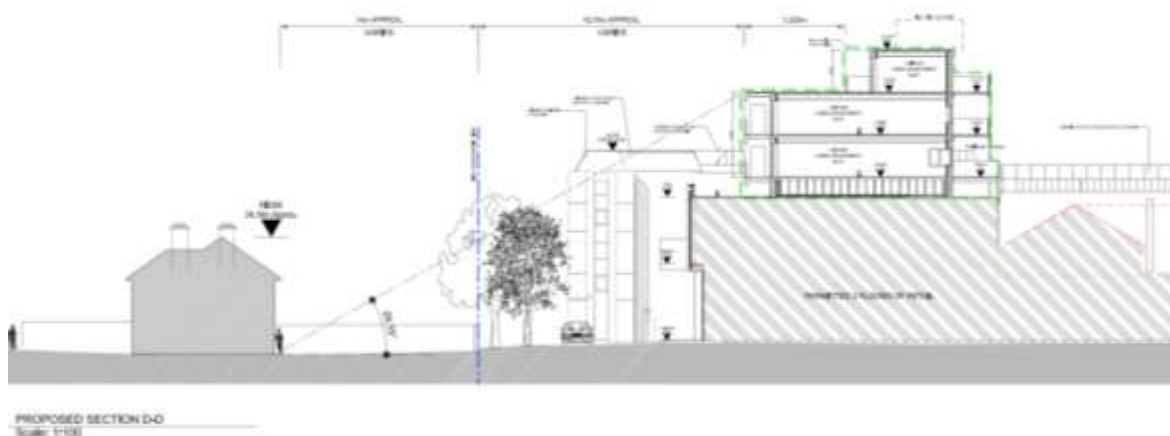
*"All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for **acceptable separation distances between blocks to avoid negative***

effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces. The minimum clearance distance of circa 22 metres between opposing windows will normally apply in the case of apartments up to three storeys in height.” (Emphasis added)

The substantial setback, which is significantly above the 22m minimum requirement separation distance, ensures that there is no line of sight from the proposed residential units and adjacent properties on George Avenue, as indicated in Figure 2.8 below.

In addition to the significant separation distances, existing mature trees (to be retained), as indicated in Figure 2.9 below, help mitigate overlooking and potential impacts on residential amenity.

Figure 2.9: Section - Proposed Residential Development and adjacent residential properties



It should also be noted that the proposed residential development does not increase the building footprint of the permitted scheme and is not proposing any development closer to the site boundary. The residential units have been designed above the permitted two levels of retail with appropriate setbacks to avoid negative effects such as overbearing and overshadowing and respect the residential amenities of existing properties in the vicinity of the site.

The retention and enhancement of boundary trees, as per the parent permission and the compliance approval under Condition No. 17, helps to address concerns in respect of overlooking, overbearing and impact on surrounding residential properties.

The proposed residential units on the south eastern elevation are orientated north and therefore will not have any material impact in terms of overshadowing of the residential properties which front onto George's Avenue. This is fully demonstrated in a Daylight/Sunlight Assessment of the proposed development which accompanies the application (included as Appendix 1 also). As summarised below, it is predicted that the proposed residential development will have negligible impacts on the surrounding residential properties.

Daylight and Sunlight Assessment

The application is accompanied by a Daylight and Sunlight Assessment conducted by BPG3, which describes how the proposed development impacts upon the sunlight/skylight amenities on neighbouring properties and impacts on neighbouring gardens. Below is a summary of the assessment results.

The assessment concludes stating the following in relation to the proposed development:

“The results of this assessment demonstrate that the proposed new development is in full compliance with the BRE guidelines. It follows from this finding that no significant loss of daylight amenity can be expected to register at any of the neighbouring residences.”

It is considered that appropriate design measures have been considered by the design team, including the layout, location and setbacks of the proposed residential units, to ensure no adverse impacts on neighbouring properties arise, whilst providing a commercially viable residential development at an appropriate scale and design.

Landscaping

Landscape drawings and a Landscape Report have been prepared by Stephen Diamond Landscape Architects and accompany the application. The proposed landscape proposal provides planters to screen the additional level of podium car park which helps to mitigate any potential adverse impacts on neighbouring properties.

It is also proposed to provide two communal terrace areas at second floor level, including a courtyard measuring 419 sq.m, and at roof terrace measuring 100 sq.m which seeks to maximise the key spaces available for residents. The proposed landscape proposal is designed to connect with the existing landscape, adjacent land uses and avoid overlooking onto surrounding residential properties in the vicinity. The proposed communal courtyard at second floor level is outlined in Figure 2.10 below.

The terrace areas provide an important communal amenity space for the apartments overlooking Dublin Bay. The proposed quantum of communal space is considered to be in accordance with the Apartment Guidelines and provide adequate communal amenity space for the residential development.

Figure 2.10: Proposed Communal Courtyard at Second Floor Level



2.7 THE EXISTENCE OF THE PROJECT

2.7.1 Introduction

The purpose of this section is to provide a description of the proposed residential extension project at the Frascati Centre which considers all aspects of the project life cycle both during construction and post construction (and decommissioning if applicable). These include the following:

- Construction Stage (Land Use Requirements, Construction Activity & Significant Effects);
- Operation Stage (Processes, Activities, Materials Used);
- Changes to the Project; and,
- Secondary and Off-Site Developments

2.7.2 Description of Construction Stage

This section of the EIAR summarises the construction and phasing of the proposed development and summarises the measures to be taken to ensure that the impact of construction activity is minimised.

■ Construction Stages

The construction stage of this project will take c. 18 months and will consist of the construction of 45 no. residential units above the rejuvenated centre. The Contractor will be required to prepare a detailed CMP on foot of these proposals.

■ Construction Activities

There are a number of construction activities involved in a project such as this. The activities (independent of phasing) can be divided into five general categories:

- **Structure**
Structure includes the structural frame of the proposed residential units above the Rejuvenated Frascati Centre. The podium car park will be a concrete slab, columns, beams and perimeter walls.
- **Enclosures**
The enclosures for the building will be formed from lightweight stone, glass, and metal cladding, composite aluminium roofs, including extensive green roofs, with insulation and water proof membranes.
- **Services**
The requisite mechanical, electrical services and plant requirements will be provided including drainage and lightning protection.
- **Landscaping**
The landscaping works include communal amenity areas at roof level of the centre.

Phasing

It is intended that the rejuvenated centre will remain open for trading during the construction of the three levels of residential above. The works will be phased in such a way as to allow the retail and commercial floorspace to trade.

Geotechnical Investigation

The proposed residential extension does not involve any works below ground. The ground conditions as established from a site specific geotechnical desk study are described in some detail in the Land and Soils and Water Chapter of the EIAR.

Predicted Impact of the Construction Stage

There are a number of aspects that will be impacted upon due to the construction of this development. This list is non-exhaustive but covers the major issues to be considered in the assessment of possible impacts of the development:

- Construction methods – duration and phasing.
- Construction traffic, parking and site working hours.
- Local traffic disruption during the upgrading of the public roadways
- Health and Safety issues.
- Noise & Vibration due to construction work.
- Air quality (principally dust)
- Construction waste management (see Appendix 1 of this EIS)

Construction Methods – Phasing of development

The construction methodology that will be utilised on the site will have three main attributes to minimise the impact of the construction phase.

- Phasing of construction
- Efficiency
- Minimisation of waste generated

Construction methods will use techniques that afford safe, efficient and cost effective methods of working.

In order to minimise the traffic impact associated with the construction phase, the Contractor will prepare and implement a Construction, including Traffic, Management Plan. This will ensure no adverse impacts on the operation of the local road network during the course of the construction project.

Health & Safety Issues

The development will comply with all Health & Safety Regulations during the construction of the project. Where possible potential risks will be omitted from the design so that the impact on the construction phase will be reduced.

Noise & Vibration due to Construction Work

The potential impacts associated with noise and vibration due to construction work are addressed in Chapter 11 Noise & Vibration.

Air Quality

The potential impacts associated with air quality due to construction work are addressed in Chapter 9 Air Quality and Climate.

2.7.3 Description of the Operation Stage of the Project

Pursuant to the EIA Directive an EIAR document is required to set out a description of the project processes, activities, materials and natural resources utilised; and the activities, materials and natural resources and the effects, residues and emissions anticipated by the operation of the project.

The proposed development is a residential extension to the Rejuvenation Project at the Frascati Centre. The primary direct environmental effects will arise during the construction stage. As a result, post-construction, the operation of the proposed development is therefore relatively benign and not likely to give rise to any significant additional impacts in terms of activities, materials or natural resources used or effects, residues or emissions which are likely to have a significant impact on population and human health, biodiversity, soils, water, air, climate, or landscape.

The primary likely environmental impacts of the operation of the proposed development are fully addressed in the EIAR document; and relate to Landscape and Visual and Daylight and Sunlight Impact.

The proposed development also has the potential for cumulative, secondary and indirect impacts particularly with respect to such topics as traffic – which in many instances – are often difficult to quantify due to complex inter-relationships. However, all cumulative secondary and indirect impacts are unlikely to be significant; and where appropriate, have been addressed in the content of this EIAR document.

2.7.4 Description of Changes to the Project

Draft Guidelines on the information to be contained in environmental impact assessment reports were published by the EPA in August 2017.

The draft guidelines state in relation to change:

‘Very few projects remain unaltered throughout their existence. Success may bring growth; technology or market forces may cause processes or activities to alter. All projects change and- like living entities - will someday cease to function. The lifecycles of some types of projects, such as quarries, are finite and predictable. Such projects often consider their closure and decommissioning in detail from the outset, while for most projects a general indication of the nature of possible future changes may suffice. While the examination of the potential consequences of change (such as growth) does not imply permission for such growth, its identification and consideration can be an important factor in the determination of the application.

Descriptions of changes may cover:

- *Growth*
- *Decommissioning*
- *Other Changes’.*

As per the draft EPA guidelines and in the interests of proper planning and sustainable development it is important to consider the potential future growth and longer-term expansion of a proposed development

in order to ensure that the geographical area in the vicinity of the proposed development has the assimilative carrying capacity to accommodate future development.

Given the permitted development on the site and the proposals included in this application, it is considered that there is limited potential for further significant expansion, however, any such proposals will be subject to separate planning application and environmental assessments. Appendix 2.1 includes details of the planning history of the subject site and adjacent developments of relevance, which have informed the cumulative impact assessments undertaken as part of this EIAR process.

The parameters for the future development of the area in the vicinity of the subject site are governed by the Dun Laoghaire Rathdown Plan 2016-2022 and the Blackrock LAP.

2.7.5 Description of Secondary and Off-Site Developments

No significant secondary enabling development is deemed necessary to facilitate the proposed development. The road improvements to Frascati Road have been implemented under the parent permission, which was the subject of an EIS.

2.8 MITIGATION MEASURES

PD&AE CONST 1: It will be necessary for the appointed contractor to prepare and implement a construction management plan (including traffic management) to reduce the impacts of the construction phase on local residents and ensure the local road network is not adversely affected during the course of the construction project.

PD&AE CONST 2: The appointed contractor should prepare a Construction and Demolition Waste Management Plan for the proposed development as part of their contractual responsibilities. The Waste Management Plan should meet the requirements of the Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects.

APPENDIX 2.1- RELEVANT PLANNING HISTORY

Frascati Shopping Centre Site

The rejuvenation of Frascati Shopping Centre was permitted under Reg. Ref.: D14A/0134. This permission is currently being implemented on site, subject to the modifications permitted under Reg. Ref.: D14A/0134 (which was the subject of an EIS), as amended by Reg. Ref.: D16A/0235 / ABP Ref.: PL 06D.246810, Reg. Ref.: D16A/0798, Reg. Ref.: D16A/0843, Reg. Ref.: D17A/0599 and D18A/0130.

The following is a summary of the relevant permissions being implemented on site for the Rejuvenation of the Frascati Centre and which the proposed residential development will be an extension of at levels 2 to 4 above.

Reg. Ref.: D14A/0134 Parent Permission for the Rejuvenation of Frascati Shopping Centre

A final grant of permission was issued by Dun Laoghaire Rathdown County Council, dated the 4th of December 2014, for part demolition and extension of Frascati Shopping Centre in order to provide for its rejuvenation. The rejuvenation of Frascati Shopping Centre will comprise of 19,592 sq.m gross floor area (GFA) of existing retained and proposed floorspace, in addition to a lower ground floor level car park with a GFA of 6,158 sq.m (total GFA including lower ground level car park of 25,750 sq.m). The rejuvenated shopping centre will consist of 16,020 sq.m GFA of lettable retail, retail services and restaurant / café floorspace compared with 9,358 sq.m GFA lettable floorspace in the existing centre.

The development will be served by 556 no. car parking spaces and 170 no. cycle spaces at lower ground, ground (surface) and podium level. The proposal incorporates all associated site development works, all other ancillary works and road improvement works to Frascati Road.

The application was accompanied by an EIS. The final grant of permission is subject to 23 no. conditions.

The key floorspace figures in the permitted scheme (D14A/0134) can be summarised as follows:

	Permitted
GFA of Rejuvenation Project	25,750 sq.m
GFA of Lettable Retail, Retail Services and Restaurant / Café Floorspace	16,020 sq.m
Restaurant / Café Floorspace	1,507 sq.m
Lower Ground Floor Car Park	6,158 sq.m
Car Parking No's	556
Cycle Parking No's (as per final grant)	170

This application for residential development proposes the omission of the second floor level restaurant unit and storage floorspace permitted under the above referenced permission and subsequently amended, and reduces the number of car parking spaces for the retail and restaurant floorspace to 553 no. space, as discussed below.

Reg. Ref.: D16A/0235 & ABP Ref.: PL06D.246810

This permission superseded two previous modification applications to the parent permission, and has been amended by three subsequent permissions which are discussed below.

A final grant of permission was issued by An Bord Pleanála, dated 18th of October 2016, subject to 5 no. conditions, for permission for modifications to the development permitted under Reg. Ref.: D14A/0134.

This application provides a total lettable retail, retail services and restaurant / café floorspace at GFA of 16,020 sq.m.

Reg. Ref.: D16A/0798

On the 26th of January 2017, a final grant of permission was issued by Dun Laoghaire Rathdown County Council for part off licence use (not to exceed 10%) within retail unit G26 of the permitted scheme (as amended). The final grant of permission was subject to 4 no. conditions.

Reg. Ref.: D16A/0843

A final grant of permission was issued by Dun Laoghaire Rathdown County Council on the 23rd of February 2017 for amendments to the parent permission for the rejuvenation of the Frascati Shopping Centre. The proposed amendments resulted in an overall net reduction in the gross floorspace from 27,156 sq.m in the permitted development (as amended) to 26,489 sq.m. A reduction in the total lettable retail, retail services and restaurant / café floorspace from 16,020 sq.m to 16,002 sq.m is proposed. The restaurant / cafe floorspace is proposed to be reduced from 1,971 sq.m to 1,786 sq.m with a consequential increase in retail / retail services floorspace. No overall reduction to the permitted car parking (556 no. permitted) or cycle parking (170 no. permitted) numbers is proposed.

The final grant of permission was subject to 6 no. conditions. The Planner's Report accepted that the proposed amendments were minor in nature in the context of the overall rejuvenation scheme.

Reg. Ref.: D17A/0599

A final grant of permission was issued by Dun Laoghaire Rathdown County Council on the 24th August 2017 for the most recent amendment application to the parent permission. The proposed amendment resulted in a marginal overall net increase in the gross floorspace of the development from 26,489 sq.m in the permitted development (Reg. Ref.: D14A/0134, as amended by Reg Ref.: D16A/0235 & ABP Ref.: PL06D.246810, Reg. Ref.: D16A/0798 and Reg. Ref.: D16A/0843) to 26,848 sq.m. An increase in the total lettable retail, retail services and restaurant/café floorspace from 16,002 sq.m to 16,361 sq.m is proposed. No overall change to the permitted car parking (556 no. permitted) or cycle parking (170 no. permitted) numbers is proposed.

The final grant of permission was subject to 8 no. conditions.

Reg. Ref.: D18A/0130

A planning application for amendments to the development permitted under Reg. Ref.: D14A/0134, as amended by Reg. Ref.: D16A/0235 & ABP Ref.: PL06D.246810, Reg. Ref.: D16A/0798, Reg. Ref.: D16A/0843 and Reg. Ref.: D17A/0599 was the subject of a final grant of permission from Dun Laoghaire Rathdown County Council on the 17th May 2018. The modifications primarily involve amendments to the configuration and internal layout of the mall and units at each level, alterations to the car parking and cycle parking arrangements, removal of the green roof and minor revisions to the elevations.

The proposed amendments result in a minor overall net increase in the gross floorspace of 7 sq.m, from 26,848 sq.m to 26,855 sq.m. A decrease of 316 sq.m is proposed for the total lettable retail, retail services and restaurant / café floorspace from 16,361 sq.m to 16,045 sq.m. The restaurant / café floorspace is proposed to be increased by 273 sq.m, from 1,786 sq.m to 2,059 sq.m, with a consequential decrease in retail / retail services floorplate. The permitted car parking (556 no. permitted) and cycle parking (170 no. permitted) numbers are retained.

The architectural drawings submitted with this amendment application indicate how the development is future proofed to allow for a future residential development from second to fourth floor level as proposed under the subject application.

Retail Extension Application

A notification of decision to grant planning permission was issued on the 19th of September 2018 under Reg. Ref.: D18A/0596 for a retail extension to the rear of Frascati Shopping Centre. The proposed retail extension consists of 3 no. retail units, with an additional GFA of 211 sq.m, including an amalgamation with Unit G15 to create Unit G22, and a new double height glazed entrance to the rear of the centre. The proposal also includes 1 no. signage zone above the rear entrance, signage zones for the 3 no. units and associated alterations to the car and cycle parking layout including the removal of 2 no. car parking spaces. Figure A2.1 below is a CGI of the proposed extension.

Figure A2.1: CGI of the Proposed Rear Extension



Previous Relevant Application on the Subject Site

A planning application for a larger scale of mixed use development on the subject site was lodged in 2005 under Reg. Ref.: D05A/0549. The development consisted of the following:

“Demolition of the entrance lobby, external canopies and the front boundary wall of the site. Extension of the existing Frascati Shopping Centre at ground, first and second floor by 4,581 sq.m increasing the overall floorspace to a total of c. 13,166 sq.m. The extension provides 17 no. new retail units, a creche facility and a restaurant unit. Provision of a multi-storey car park with a total of 702 no. spaces. Provision of 65 no. residential units at 2nd to 5th floor comprising 3 no. 1 beds, 46 no. 2 beds, 12 no. 3 beds and 4 no. duplex units. A central garden courtyard will be provided at second floor level to serve the residential

units. 65 no. car parking spaces will be proposed at basement level with separate access. Proposed road works including reconfiguration of the existing site access on Frascati Road and other associated site works. An EIS was submitted with the application.”

In relation to the scale and height of the 6 no. storey development, the Planner’s Report states that *“the fourth and fifth floors are set back from the front and side edges of the building, which will decrease the perception of the overall height of the building. The architectural language also uses indents, protrusions, overhangs, vertical and horizontal emphases, all of which enable the building to be visually acceptable on the site and in the area”*. An extract of the proposed elevations under Reg. Ref.: D05A/0549 is illustrated in Figure A2.2.

Dun Laoghaire Rathdown County Council refused permission due to 1 no. reason:

“With regard to the quantum of retail and residential uses, that would have intensified the road usage in the vicinity of the site, increasing pedestrian movements crossing the N31 (between the Frascati and Blackrock Shopping Centre) leading to endangerment of public safety by reason of a traffic hazard, in the absence of a segregated safe pedestrian/mobility impaired and disabled interlink bridge between these areas”

However, the height of 6 storeys was considered acceptable by the Planning Authority.

Figure A2.2: North East and South West Elevation under Reg. Ref.: D05/0549

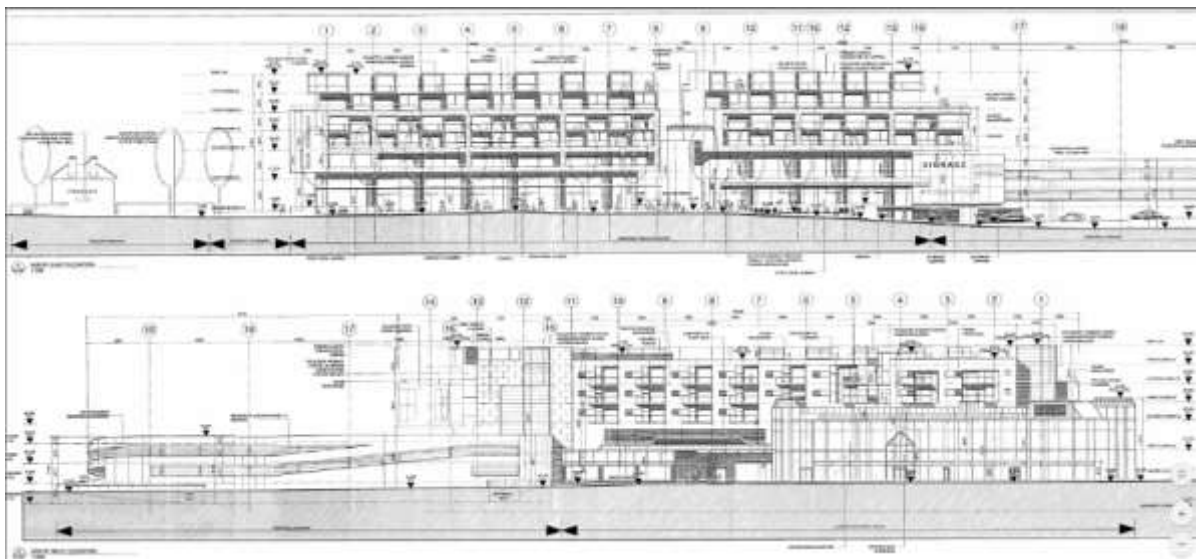


Figure A2.3: : Images of the Scheme Proposed Under Reg. Ref.: D05A/0549



Other Relevant Planning History in the Area

Enterprise House, Frascati Road

On the opposite side of the Frascati Road the former Enterprise House office site is undergoing redevelopment for a new five storey office building, as permitted under Reg. Ref.: D16A/0418 and ABP PL06D.247702. At the time of a site visit on the 6/10/18 the former office building had been demolished and the central core of the new development is constructed.

The parent permission from November 2016 provides for the replacement of the original 1980s Enterprise House building of 3,065 sq.m with a new structure of 8,082 sq.m. The proposed commercial building has a maximum overall height of c. 21.3 metres. The final grant was subject to 11 no. conditions. Figure A2.4 below is a CGI image of the permitted scheme.

An application for modifications to the permitted development is currently at appeal stage with ABP under Ref.: 301751-18 (DLRCC Reg. Ref.: D18A/0211). This application seeks to increase the floor space of the permitted scheme by a further 438 sq.m.

Figure A2.4: CGI of the Permitted Office Block at Enterprise House



Source: www.3ddesignbureau.com

Blackrock Shopping Centre- Frascati Road

Blackrock Shopping Centre is located opposite the Frascati Centre. The centre was built in 1984 and contains 40 no. retail/commercial units including the SuperValu supermarket which is the anchor tenant.

Planning permission was granted under Reg. Ref.: D17A/0644 for the upgrade of the centre to include external and internal refurbishment and a new glazed roof. The works have recently commenced on site. The alterations include an additional storey and new front façade which increases the overall height to 15.175 metres.

The planning permission provides for the following key upgrades / alterations, as described in the project description:

- the provision of a new western entrance façade.
- internal alterations include revisions to internal shop façade of Units 7-26.
- revision to existing internal circulation including the relocation of 2 no. travellers from level -1 to lower ground floor; reduction in size of Unit 19 on level -1; revision to shop façade to Units 27-30, 34-36, 38-44, 48a-52, 80-88 on lower ground floor.
- demolition of Unit 93; removal of roof structure; part demolition of gallery area on lower ground floor; amalgamation of Units 14 and 15 on level -1.
- extension of Units 15-18 and 20 on level -1; construction of new shop fronts to Units 15-26 on level -1; amalgamation and extension of Units 39-40 on lower ground floor.
- extension of Units 30, 38-44, 51-52, 80, 82-85 and 86-88 on lower ground floor; construction of new shop entrance to Units 27-30, 34-36, 38-40, 42-44, 48a-52 and 80-88.

- provision of 2 no. kiosk to level -1.
- construction of new gallery area; extension to retail unit at upper ground floor and Change of Use of 501.7 sqm to Office/Gym/Retail/Dance Studio/ Crèche (use to be subject to first occupation); (the additional retail floor space is 266.2 sqm).
- provision of lift; extension to office at first floor; construction of new office to second floor; (the additional office floor space is 845.8 sqm).
- 1 no stairs connecting level -1 and lower ground floor; construction of internal canopy/roof structure over existing open internal area, provision of 4 no. flag poles, substation and switch (36.6 sqm) and all associated site development works.

Figure A2.5 below is a CGI image illustrated the now permitted upgrades to the western façade.

Figure A2.5: CGI View of the Western Façade of the Upgrade Blackrock Shopping Centre



Source: www.3ddesignbureau.com